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Response to Planning application from Hertfordshire County Council (T and CP GDP Order 2015)

Director of Planning

North Hertfordshire Council
Council Offices
Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

District ref: 24/02712/PNQ
HCC ref: NH/23203/2024
HCC received: 4 December 2024
Area manager: Manjinder Sehmi
Case officer: Shamsul Huda

Location

KIRBY MANOR FARM NORTHFIELD ROAD ASHWELL BALDOCK SG7 5JQ

Application type

Prior Approval

Proposal

Prior Approval Class Q Agric to Dwelling : Conversion of existing agricultural buildings to provide 8 residential units.

Recommendation

Notice is given under article 22 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that Hertfordshire County Council as Highway Authority recommends that permission be refused for the following reasons:

COMMENTS:

This is a prior approval application which proposes to convert the existing agricultural holding into eight (8) residential dwellings. The supporting document (statement) has failed to confirm the housing mix. However, the proposed development [as outlined in the Statement Accompanying Prior Approval Submission] is significantly out of line with both national and local policies such as the National Planning Policy Framework (NPPF- December 2024), the Local Transport Plan (LTP4).

- The applicant has failed to demonstrate how the proposed development will comply with the policies contained in the current the Local Transport Plan (LTP4) and National Planning Policy Framework (NPPF, Dec-2024).
- There are no appropriate provisions for pedestrians and cyclists to travel conveniently and safely between the site and key facilities and amenities (e.g. bus stops, super/retail shops, pubs, schools, and health centre/GPs,). More particularly vulnerable road users, such as those in wheelchairs, those with disabilities, children, etc, will have to navigate roads with no safe and sucre crossings and footways along Northfield Road which unlit.

- The application site is not benefiting from any existing bus stop within 400m and public transport (Bus Services). As such the proposal overall does not comply with HCC's Local Transport Plan 4 policies 1 and 5, and the NPPF paragraphs 115-117.
 - According to the NHDC's Local Plan (2011–2031), the application site is neither assigned nor included. As such, bringing the development site up to current highway policies' acceptable level is challenging.
 - There are no local education facilities (primary and secondary) near by the site. Pupil would have to rely onto car transport to get to the nearest secondary/primary schools to the neighbouring towns such as Royston, Baldock, Cambridge or Letchworth.
 - Inadequate infrastructure for Cycling and Walking to support the proposed development. In fact, no major walking and cycling routes in or around Ashwell are identified in the NHDC's Local Cycling and Walking Infrastructure Plans (LCWIP), adopted in September 2023 for their improvements.
 - Furthermore, no new infrastructure projects or upgrades to the current infrastructure project are included in the HCC's North Central Growth and Transport Plans (NCGTP-2022) to support any anticipated future growth in the Ashwell area.
 - Overall, based on inadequate and substandard sustainable travel opportunities and public transport services, the development proposal is therefore contrary to
 - i) Paragraph 115 of the NPPF, Dec 2024 which states that a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location, b) safe and suitable access to the site can be achieved for all users.
 - ii) Paragraph 117 of NPPF which states that " a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use; b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport,
 - iii) The LTP4 Policy 1 which states that: the county council will in the design of any scheme and development of any transport strategy consider in the following order: opportunities to reduce travel demand and the need to travel, vulnerable road user needs (such as pedestrians and cyclists), passenger transport user needs, powered two-wheeler (mopeds and motorbikes) user needs and other motor vehicle user needs
 - iv) The LTP4 Policy 5 which states: The county council will to work with development promoters and the district and borough councils to: a) Ensure the location and design of proposals reflect the LTP4 Transport User Hierarchy and encourage movement by sustainable transport modes and reduced travel demand. b) Ensure access arrangements are safe, suitable for all people, built to an adequate standard and adhere to the county council's Highway Design Standards,
 - v) The LTP4 Policy 7 which states that: The county council will seek to encourage and promote walking by: a) Implementing measures to increase the priority of pedestrians relative to motor vehicles and
 - vi) The LTP4 Policy 8 which states: The county council aims to deliver a step change in cycling, through: b) Implementing measures to increase the priority of cyclists relative to motor vehicles. e) Facilitating provision of secure cycle parking.
- existing public bridleways and footpaths and, where appropriate, incorporate them in a sensitive and positive fashion into their layouts and designs".

Site Description:

The application site is currently made up of unused agricultural buildings and can be accessed via existing access points off Northfield Road. Northfield Road is an unclassified road type -U which provides local access services to road hierarchy. This is a narrow county lane with no provision of footways, unlit and subjected to 60 mph.

Policy:

Key policy documents used to assess the application are.

- National Planning Policy Framework (NPPF-Dec 2024).
- Hertfordshire Local Transport Plan LTP4 2018-2031
- North Hertfordshire Local Plan 2011-2031
- HCC's Place & Movement Planning Design Guidance adopted in March 2024
- Ashwell Neighbourhood Plan 2022

Road/Highway Safety:**Visibility:**

Section 7.1 of the statement indicates that a 2.4x36 m visibility splay will be provided at the access point. The highway authority considers that the proposed visibility splay is substandard based on the existing speed limit (60mph) of Northfield Road. The highway authority have concerns that the visibility splays will fall onto third party lands where the applicant will not have authority for its maintenance.

Refuse Collection:

The submitted documents do not show any refuse bin collection location. However, refuse collection vehicles must be able to stop within the 'maximum refuse carry distance' specified by the Local Planning Authority or within 25m of any bin storage area, whichever is the lesser distance. Residents should not have to carry their rubbish more than 30m to a storage point. (Sources BS5906:2005 and Schedule 1 Part H Building Regulations)

Swept Path Analysis:

The site plan as proposed (Ref- 164PP01) has failed to show the swept path analysis for refuse collection vehicle. Therefore, a clear and clean swept path analysis of a 12.2m long Refuse Collection Vehicle (RCV) need to submit to justify that.

- A refuse vehicle and other emergency vehicles can safely manoeuvre within to enter and then depart in a forward gear.

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Sustainable Travel:

The submitted statement is failed to talk about the provision of sustainable travel provisions to and from the application site and to other key local services including public transport links.

A key element of national, regional, and local policy is to ensure that developments are in areas where alternative modes of travel are available. Developments should be located close to complementary land uses. This supports the aims of integrating planning and transport, providing more sustainable transport choices, and reducing overall travel and car uses. In this instance, the applicant has failed to review the accessibility of the site to key facilities and services and alternative modes of travel such as:

- Walking.
- Cycling; and
- Public Transport

The application site is remote from key facilities and amenities and does not benefit from good access to public transport or cycleways/footways. At the same time the applicant has failed to offer any improvements for wider highway sustainability/accessibility, and therefore the proposal falls short of paragraphs 116-117 of the NPPF (2024) and Hertfordshire County Council's LTP4 (2018) policy 1,5 ,7 &8.

CONCLUSION:

Though it is a prior approval application, the applicant still needs to address the highway impacts and sustainable travel issues. There are several significant highway concerns in terms of safety and sustainable travel accessibilities. The highway authority considers that the development proposal seems to accommodate the private motorcar first, and pedestrians and cyclists as more of an afterthought. Current planning policy makes it clear that the needs of pedestrians should be considered first in the user hierarchy, cyclists second, and public transport users third. The needs of the private motorcar user should be considered last. This is outlined in paragraph 115-117 of the NPPF (2024), which also states that developments should "address the needs of people with disabilities and reduced mobility in relation to all modes of transport"... and "create places that are safe, secure and attractive, which minimise the scope for conflicts between pedestrians, cyclists and vehicles". All this is reflected in our Local Transport Plan 4, policies.

In conclusion, the highway authority recommends objecting to the proposal based on the current submission because of the fundamental non-compliance with LTP4 and NPPF policy, which is mentioned at the beginning of the report

Signed
Shamsul Huda

7 January 2025