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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: 24/02652/FP
HCC ref: NH/23176/2024
HCC received: 3 December 2024
Area manager: Manjinder Sehmi
Case officer: Shamsul Huda

Location

Old School House , Park Lane, Old Knebworth, Hertfordshire, SG3 6PR

Application type

Full Application

Proposal

Full Planning Permission : Erection of five single storey terraced dwellings with associated landscaping, boundary fencing and cycle storage

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:

There is insufficient information supplied with this application to enable the Highway Authority to reach a recommendation. In the absence of the necessary information, the Highway Authority recommends refusal due to doubt over possible implications for highway safety, sustainability, and convenience.

The proposed development as indicated on the Site Plan (Ref-2241-101, dated August ,2024) will not be acceptable. Objection for the following reasons

1. The application 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-2023).
2. The development does not offer appropriate provisions for pedestrians and cyclists to travel conveniently and safely between the site and Park Lane). In particularly, vulnerable users, such as those in wheelchairs, those with disabilities, children, etc, will have to walk onto the main access road to get into park Lane.

3. Also, no footways are proposed from application site to connect with the exiting footways along the Park Lane. As such the proposal overall does not comply with HCC's Local Transport Plan 4 policies 1 and 5, and the NPPF paragraphs 114-116.
4. It fails to provide required visibility splays for peds and cars at the main access point Park Lane.
5. No Swept Path Analysis is provided for suitable size of Refuse vehicles.
6. It fails to provide details for cycle parking.
7. Overall, no measures are proposed to improve the above, and the application is therefore contrary to
 - o i) Paragraph 114 of the NPPF which states that a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location, b) safe and suitable access to the site can be achieved for all users.
 - o ii) Paragraph 116 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;
 - o 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,
 - o iv) 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,
 - o v) 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
 - o vi) 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.

This is a full planning application for erection of 5 single story dwellings with associated road, parking, and ancillary works.

Key policy documents used to assess the planning application are.

1. National Planning Policy Framework (Dec 2023).
2. Hertfordshire County Council's (HCC) Local Transport Plan-4 [2018-2031, May2018]
3. HCC's Place & Movement Planning Design Guidance adopted in March 2024
4. Manual For Street (MfS1 2007)
5. North Herts Local Planning policy [2011-2031]

HIGHWAY IMPACTS:

Swept Path Analysis

No swept path analysis and turning facilities are provided to support the application and justify that Refuse Collection Vehicles (RCV) can enter and exit the site in forward gears. Therefore, a clear and clean swept path analysis for a 12.1m long Refuse Collection Vehicle (RCV) needs to provide to demonstrate that.

- The proposed site access can accommodate a standard refuse vehicle; and,

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

Visibility:

No visibility splays are provided which also raised fundamental concern to the highway authority. The accesses to the new development would need to achieve an acceptable level of vehicle-to-vehicle inter-visibility that would comply with Manual for Streets. The vehicle-to-vehicle inter-visibility splays would be required to have a minimum of set-back of 2.4 metres x 43 metres along the adjacent local access roads and this should be shown on any future submitted drawings. The application site is currently under used and it is anticipated that new proposal will increase the vehicular movements onto Park Lane. Therefore, it is essential to provide an adequate visibility at both side of the exiting access point.

Parking:

In regards with the cycle parking provision, no details are provided for cycle parking for the proposed development. All cycle parking provision should be designed in accordance with the HCC's new guidance content in the part 4, chapter 6 para 2 of the Place & Movement Planning and Design Guide for Hertfordshire.

Pedestrians and Cycle movements:

Based on the current access arrangement as shown the drawing (Ref-2241-101, dated August ,2024), the Highway Authority has considered that the proposed development site will be dominated by motorised travels rather than active travels due to lack of walking and cycling facilities to and from the site.

It fails to make a provision of footways alongside of site access road to connect with the existing Park Lane footways. In this instance, pedestrians will have to travel onto the main site access road to use the existing footways along Park Lane. This is contrary to the policies 1, 5 ,7 and 8 of LTP4.

As such, it can be considered as falling significantly short of sustainable travel related policies in the NPPF. The revised NPPF (Dec 2023) has a greater emphasis on the importance of sustainable travel compared to its predecessor. Paragraph 114 (b &a) states that developments should ensure that "safe and suitable access to the site can be achieved for *all* users", and that "appropriate opportunities to promote sustainable transport modes can be – or have been – taken up".

Paragraph 116(a) goes on to states that "development should give priority first to pedestrian and cycle movements... create places that are safe, secure and attractive, which minimise the scope for conflicts between pedestrians, cyclists and vehicles... and allow for the efficient delivery of goods, and access by service and emergency vehicles"

Equally, Hertfordshire County Council's new Local Transport Plan (LTP4, 2018) also places a much greater emphasis on the importance of sustainability/accessibility.

Policy 1 for example states that the first step to consider is that "opportunities to reduce travel demand and the need to travel" are identified. After that, the needs of vulnerable road users (such as pedestrians and cyclists), then passenger transport users, must come ahead of those who use motorised forms of travel.

Conclusion:

In summary, there are several significant highway concerns with this planning application as submitted, it seems to have been primarily designed 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 114-116 of the NPPF (2023), 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.

Based on the current submission, I have no option but to recommend refusal at this occasion. However, if the aforesaid highway concerns are addressed satisfactorily, I am more than happy to reconsider the application.

Signed

Shamsul Huda

13 December 2024