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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: 25/00279/FP  
HCC ref: NH/23927/2025  
HCC received: 13 February 2025  
Area manager: Manjinder Sehmi  
Case officer: Paul Marshall

**Location**

Land At Corner Of Protea Way And, Pixmore Avenue, Letchworth Garden City, Hertfordshire

**Application type**

Full Application

**Proposal**

Full Planning Permission : Erection of commercial buildings (flexible B2 and B8) including access, parking, landscaping and associated works

**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:

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 and convenience. Please see reasons for refusal below:

- A Stage 1 Road Safety Audit is required.
- A Vehicle and Pedestrian visibility splay is required.
- Vehicle tracking plan do not show all movements of commercial vehicles.

**COMMENTS**

The proposals are for a Full Planning Permission: Erection of commercial buildings (flexible B2 and B8) including access, parking, landscaping and associated works. Pixmore Avenue is an unclassified

local access road and is highway maintainable at public expense. A 30mph speed limit applies. on HCC's Place and Movement network, Pixmore Avenue is classed as P2/M2 (E.g. Multi-Function). No reportable highway accidents recorded within the immediate vicinity of the application site (5-year rolling). No Public Right of Way (as shown on the PRow map) directly affects the site or would be affected by the proposal. The county council considers Pixmore Avenue to be a traffic sensitive road.

#### Policy Review:

The key documents used to assess the application are:

- Manual for Streets 2007
- National Planning Policy Framework (July 2021)
- Hertfordshire County Council's (HCC) Local Transport Plan-4 [2018-2031, May2018]
- Cycle Infrastructure Design DfT Local Transport Note 1/20 (July 2020)
- HCC's Place & Movement Planning Design Guidance (adopted in March 2024)

#### PLANNING HISTORY

The application site planning history, from 2006 to 2021 with a range of purposes. However, despite the various permissions, no schemes were ever implemented, and the site remains vacant.

#### DRAWINGS

The Highway Authority note the submission of materials in support of the planning application, including drawing numbers:

Site location plan ref. 271 P01-;  
Proposed Site Plan ref. 271 - 001 P12;  
Existing Site Plan ref. 271 - 002 P01;  
Proposed Block Plan ref. 271 - 003 P02;  
Proposed Site Plan Landscaping ref. ref. 271 - 004 P02;  
Proposed Plans ref. 271 - 010 P01;  
Proposed Elevations ref. 271 - 014 P7;  
Indicative Site Sections ref. 271 - 015 P5;  
Roof Plans ref. 271 - 016 P3;  
Proposed Street Scene ref. 271 - 017 P1;  
Transport Statement.

#### PROPOSED DEVELOPMENT

Section 3.1 of the Planning Statement states:

The proposals include 2 new commercial buildings which will each accommodate 2 individual warehouse units each with first floor mezzanine offices. The units would operate flexibly within use Class B2 and B8 i.e. for employment related uses. A flexible permission will ensure that the buildings are able to meet changing market requirements and are less likely to remain vacant in the future.

#### ACTIVE TRAVEL

Section 2.5 of the Planning Statement describes the following:

The site is within a highly sustainable location and approximately 700 metres walking distance to Letchworth Town Centre, which is to the west of the site. The site is also within a reasonable walking or cycling distance from all the services and facilities of Letchworth Town Centre, including Letchworth Railway Station, which has frequent services to London. There are also a number of bus stops within close proximity on Pixmore Avenue. This includes the Phoenix Park bus stop and Pixmore Centre bus stop which are within easy walking distance of the site. There are other bus stops within close proximity, including those within the town centre which provide services to locations much further afield.

The Highway Authority agrees. The site is in a well-connected industrial area with excellent links to the town centre and nearby residential streets.

## PARKING

'Cycle Infrastructure Design' DfT Local Transport Note 1/20 (July 2020) recommends for cycle parking storage should be 2m (1.8m is acceptable) in length by 0.3m space between cycles. Outside cycle parking should be covered and lockable. The provision of well-located, safe and secure cycle parking is a key factor in encouraging people to cycle as an alternative to using the private car. Section 5.36 of the Planning Statement specifies 6 cycle parking spaces. Please be aware of the above requirements. Cycle parking should be covered and lockable.

## Vehicle Parking

Section 5.36 of the Planning Statement specifies the following:

The vehicle parking proposals include 24 spaces, with 4 disabled bays and 5 for electric vehicles. The Council's SPD 'Vehicle Parking Provision at New Development' sets a maximum of 1 space per 40 m<sup>2</sup> for Class B2 and B8 use. The proposed 24 spaces meet operator requirements without exceeding SPD standards.

The submitted drawing (Ref-271-001 P12) appears to show that parking dimensions are substandard in the context of HCC's Place & Movement Planning Design Guidance (adopted in March 2024) which recommends parking bays should be 5m x 2.5m. (Please see tracking comments in relation to parallel parking.)

## ACCESS

Section 4.2 of the Transport Statement specifies a new 6m wide access with 6m radii from Pixmore Avenue. The existing dropped kerbs at the southwestern corner (the site's former access) will be retained for vehicle turning into Protea Way. Figure 6 shows the new dropped kerb at the northwestern corner with tactile paving. The Highway Authority finds the proposed access design acceptable.

However, vehicles turning right might confuse those turning left out of the site because the distance between the site access and Protea Way access is only about 1.6 meters. A Stage 1 Road Safety Audit is needed to address any issues this may cause.

## VISIBILITY

Although the Transport Statement describes good visibility and that the new access would exceed the minimum 2.4m x 43m requirement for 30mph speed limit areas. This needs to be demonstrated on a plan.

HCC's PMPDG Part 3 Ch9 para 12 states:

Achievable levels of inter-visibility between drivers exiting the site and other highway users (vehicles, cyclists and pedestrians) are not demonstrated on submitted plans.

A visibility splay of 43m in each direction would be consistent with Manual for Streets, Table 7.1 and PMPDG Part 3 Ch9 para 12 for a 30mph speed environment (set-back 2.4m from the carriageway, a 2m set-back may be considered in lightly trafficked and slow speed situations, MfS:7.7.7). Within the vertical plane, there should be no obstruction to visibility 2m high down to a point 600mm above the carriageway, the latter to ensure that small children can be seen (MfS 7.6.3), passing along the footway.

#### TRACKING

The plans lack sufficient detail, especially regarding turning movements, which must include wing mirrors. The parallel parking bays at the east end of Unit B may cause issues. If the bay closest to the access of Unit B is occupied, vehicles accessing the bay behind may struggle to park within the lines. Vehicles are unlikely to park close to the wall on the passenger side. If vehicles are not parked precisely within the lines, a 10-meter-long HGV, as shown on tracking drawing 114828-CAL-XX-XX-DR-D-0420 P1, may struggle to manoeuvre to access Units D and C, potentially clipping parked vehicles. This could result in the parking bays being unused. However, if they were unused, it would provide improved manoeuvrability.

The tracking diagrams do not show how vehicles manoeuvre if Units D and C are occupied. This may cause vehicles to stack within the site and block the access, potentially leading to staff vehicles parking half on the footway, which is a safety issue.

#### EMERGENCY ACCESS

The nature of the site puts the proposals / access within 45 meters from the public highway it is unclear if a fire service vehicle hose (45min length) can reach all parts of the site buildings (As required in accordance with MfS 6.7.2) This would need the Fire Service to review.

#### REFUSE / RECYCLING

The LPA may wish to confirm with their waste and recycling team that sufficient space is provided for commercial waste and recycling arisings.

#### CONSTRUCTION MANAGEMENT PLAN

The Transport Statement section 7.1 Construction Traffic Management states:

The Development will use the existing entrance and crossover until such point toward the Highways amendments have been programmed, there is no proposal to use any other remote accesses egress or use any form of temporary crossover from adjacent private roads. Prior to commencement of work on site a Traffic Management Plan SHEQ-021 will be compiled, specifying the route to be taken by HGV's and heavy plant accessing the site. All vehicle routes must be at positions away from residential areas, and vehicles must not wait on the road. The approved plan will be implemented throughout the duration of the construction works.

The Highway Authority would require a plan which must include a drawing of the construction site and the dedicated areas within. These should include but not limited to, construction vehicle parking area, wheel washing, and storage area etc.

## CONCLUSION

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 and convenience. Please see discussion above.

**Signed**

Paul Marshall

5 March 2025