

2 July 2025

Naomi Reynard
Planning Department
North Herts Council
Gernon Road
Letchworth Garden City
SG6 3JF

Dear Naomi,

24/02889/FP | Full Planning Permission : Residential development of 281 dwellings and associated roads, parking, realignment of Back Lane, drainage, landscaping, open space, servicing facilities and associated works (as amended). Land At Roundwood, Back Lane, Graveley, Hertfordshire

The Great Ashby Community Council (GACC) acknowledges receipt of NHC's notification of amendments submitted by the Applicant in relation to the above planning application.

These amendments were reviewed by GACC at a meeting of the Community Planning Committee held on 2 July 2025.

We request that the following comments be taken into consideration during the determination of this application, in addition to those previously submitted in our letter dated 21 February 2025 and the representation from Harwood Savin dated 20 February 2025.

Reference is made to the following documents available on the NHC Planning Portal:

- Covering letter including summary of changes 3.6.25
- Transport Technical Note – Monitor and Manage
- DES-716-110-2_Parking Locations Plan (as amended)
- Highways Consultee Response 31.01.2025

Monitor and Manage

The Applicant has submitted an additional document in support of their Application: *Transport Technical Note – Monitor and Manage*, for which GACC would like to provide the following comments:

1.4 of the Technical Note describes:

'Monitor and Manage' is a mechanism whereby works to mitigate the impact of a proposed development can be assessed following the start of the construction of the development. It allows the true impact of a development to be determined using surveys that are conducted during and following the construction of that development.

It is our understanding that 'monitor and manage' has been introduced into the new NPPF but that there is a requirement for the Applicant to front-load investment, modelling, and local consultation on these aspects before any planning permission may be granted. We believe the intention of this type of approach is to design to capacity and mitigate for future demand in a way which communities wish, rather than unnecessarily provide for the future at the outset. We feel it is inappropriate to use this approach when parking problems already exist on the roads identified, and traffic congestion on Calder Way and Back Lane already exists.

Our concerns are listed below based on the documents we have seen on the planning portal:

Calder Way and Back Lane

- Both of these roads have experienced accidents and near accidents in recent months, some with vulnerable road users. In fact, we are aware of a near miss within the last week involving a young cyclist on Calder Way. There are safety concerns if the volume of traffic is increased through these roads.
- Residents living on Calder Way have reported experiencing abuse from motorists caught in congestion, and these residents struggle to leave home in their vehicles or when walking/cycling. This may be considerably worse should an increased volume of traffic utilise this road. We have seen no mitigation which could be put in place to support these residents leaving their properties, if needed.
- Traffic resulting from the proposed development would also impact the roundabout on Mendip Way intersecting with Haybluff Drive and the junctions of Bray Drive and Mendip Way with Great Ashby Way. We request these are included in the surveys and ANPR cameras are installed at these locations at their junctions with Great Ashby Way.
- It is uncertain how the re-routed Back Lane will cater for the rural traffic between Graveley and Weston and vice versa, for example tractors and horse boxes.
- We note in 3.22 of the Technical Note there is suggestion that the Highway Authority may wish to restrict larger vehicles from using Calder Way, but this mitigation would push rural and traffic for the proposed development through the narrow village roads from Weston or Graveley. This is not feasible.
- Similarly, 3.21 of the Note suggests Calder Way mitigation could include traffic lights, which would result in queuing traffic onto Great Ashby Way, or alternatively, widening the ends of the road, which may actually make the situation worse.
- We suggest a junction survey would be needed at the proposed re-routed Back Lane towards Weston to ascertain what volume of traffic travels north from within the proposed development, and what proportion of traffic is through traffic.
- It is not clear how the access point from Haybluff Drive across the existing Back Lane into the proposed site would be managed during the initial construction phase, before a re-routed Back Lane has been constructed and operational. There are obvious safety concerns for this point where heavy vehicles cross into the site due to visibility and the vulnerability of the users of Back Lane, including horse riders and cyclists.

Parking Displacement

- The access route through the existing residential roads within Great Ashby to the proposed development would exacerbate the issues with poor infrastructure and parking provision. These issues were inbuilt from design and are well recognised and documented by NHC and HCC. We feel that there is a genuine safety concern should parking be displaced and construction traffic introduced into the area without due diligence.
- There has been no modelling provided to show the likely movement of vehicles and no modelling to show the impact on local roads of such a drastic cut in on-street parking provision.
- There is no plan or supporting evidence to show that the displaced parking suggested by the Applicant would be sufficient for long and wide construction vehicles such as a crane.
- The Applicant states in 2.21, 'These discussions [with HCC Highways] have shown that a technically deliverable solution involving in-verge parking bays could be constructed on Mendip Crescent [sic] and Bray Drive to increase the number of vehicles that could be parked'. This is vague and it does not constitute a mitigation measure which has been modelled or fully investigated. It does not provide the number of parking spaces which could be delivered and we feel it is unlikely that it would provide sufficient spaces to accommodate the significant loss of on-street parking.

- No information has been provided on what scenarios the developer intends to monitor, the intended triggers and how these triggers would be managed or mitigated. The Note only mentions that this would be agreed alongside the Construction Management Plan.
- GACC would like reassurance that construction workers would not add to the problem by parking in local streets during work hours, and we seek confirmation that all parking for the proposed development would be catered for on site.
- GACC requests that construction traffic would not be permitted during school hours.

Surveys

- The Applicant is relying on survey data from as early as May 2022; this is out of date. Even at the time it was taken, we consider the numbers unrealistic and our view is that more robust data needs to be collected.
- Our concern with the comparison data provided in the Transport Assessment is the use of Stevenage 001 and 002 to predict statistics for the proposed development. These areas in Stevenage are served by better infrastructure, transport links and public transport. For example, roughly 24% of households in Stevenage 001 do not own a car or van, in comparison under 10% of households in Great Ashby & Wymondley do not own a car. The proposed development would have more in common with the parish of Great Ashby which has a higher volume of car ownership due to the lack of infrastructure in this area. It seems logical to make predictions and forecasts using data gathered from the most recent census for Great Ashby.

Parking Court Surveys

- We are confused why a parking survey is being conducted on the courtyard parking, which to our knowledge is private, belongs to the freeholders of the buildings, and is not accessible for other residents in the area. Our opinion is that it is immaterial whether these spaces are in use or not, and any spaces in these areas should not be counted as free or available alternative parking for displaced vehicles.

On-street parking Surveys

- The survey area seems small. Should these proposed parking restrictions be imposed, it is likely that some residents will look to try and park on beyond the survey area, further on to Mendip Way or even at the Neighbourhood Centre. The area of Great Ashby Way shown within the survey area would be dangerous for parking; it is likely that displaced cars would be more likely to park in the roads opposite or further down Great Ashby Way towards the school. Any parking on Great Ashby Way severely impacts on the flow of traffic through Great Ashby and increasing parked cars close to the school has safety implications.

Methodology

- We note the Applicant's suggested use of ANPR and in-person surveys. While the purpose of these surveys is to monitor and manage the displacement of parking, we are mindful that the surveys need to be taken throughout the day and night, and their focus needs to be widened to include the impact on all road users including road safety and backlogged traffic.

S106 estimate

- It is our view that the proposed sum of £400,000 would not be sufficient to adequately cover mitigating work needed for Great Ashby, Weston and Graveley.

Summary

In considering the Monitor and Manage approach as described in the Technical Note, it is our view that there is insufficient parking available to safely accommodate the proposed displacement of vehicles, and the Applicant has

provided no evidence to the contrary. Further, should this proposed approach be accepted, GACC believe that there is insufficient roadside locations to safely mitigate the problems created from the displaced vehicles. The Applicant has provided no factual reassurance that this can be achieved. It is our view that the survey results severely underestimate the traffic expected from the proposed development and the mitigating solutions presented for Calder Way are not feasible and unsafe, not conforming to NHC Policy T1. For these reasons, **GACC cannot currently support the 'monitor and manage' strategy proposed.**

Bearing in mind the large number of representations and public comments submitted to NHC highlighting problems with construction traffic and access to this proposed development, we respectfully request that NHC insist on inspection of both a robust Monitor and Manage Plan and the initial Construction Management Plan to gain assurance that the plans suggested by the Applicant are feasible, prior to making a decision on this application.

Comments on the Proposed New Development

Extended Haybluff Drive Emergency Access

Our observation is that where the proposed extended Haybluff Drive is terminated at the point of the emergency service access to the proposed re-routed Back Lane, there is no turning circle to enable prohibited traffic to turn around. This would require traffic/deliveries potentially needing to reverse back past 6 homes to reach a junction and this appears to be a flaw in the design layout which puts vulnerable road users at unnecessary risk.

Vehicle Parking at the Proposed Development

There appears to be no allocated parking space for some plots - plots 130, 71, and 93 for example; this does not meet the minimum car parking standard as per NHC policy [Vehicle Parking at new development SPD](#). The impact being to reduce the courtyard visitor spaces by at least 3 on the Haybluff side of the proposed development.

It is not possible to determine if all properties have covered secure space for cycles in accordance with the minimum cycle parking standard, as stated in the NHC Vehicle Parking at new developments SPD. As the proposed development intends to promote sustainable travel, this would appear to be a necessity.

Visitor parking at the Proposed Development

From a vehicular point of view, the proposed development is essentially 2 distinct developments; one served by Back Lane and one served by the extension of Haybluff Drive.

The following visitor space allocation is dictated by the NHC Vehicle Parking at new developments SPD:

Visitor/unallocated	Between 0.25 and 0.75 spaces per dwelling (rounded up to nearest whole number), with the lower standard being applied where there are no garages in the proposed scheme and the higher standard applied where every dwelling in the scheme is to be provided with a garage.	If no garage or secure area is provided within curtilage of dwelling then 1 covered and secure space per dwelling in a communal area for residents plus 1 space per dwelling for visitors
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On analysing document DES-716-110-2_Parking Locations Plan (as amended), we note the following visitor space allocation:

The site served by Back Lane shows an allocation of 39 on-street visitor spaces (percentage allocated = $39/96 = 37.5\%$). The NHC SPD requires an allocation between 24 and 72 for 96 units.

The site served by the extension to Haybluff Drive (not including courtyard apartment visitor spaces) shows 7 on-street visitor spaces (percentage allocated = $7/104 = 6.7\%$). The NHC SPD requires an allocation between 26 and 78 for these 104 units

For apartments within the existing Great Ashby development, it is our understanding that the courtyard parking is private for the use of the apartments and their visitors, and not for general use. We assume that may be the case for the proposed development. However, if the courtyard visitor spaces are taken into account, there are an additional 27 courtyard visitor spaces within the flat/apartment parking, with adjustment for the three missing allocated spaces for the 1 bed apartments previously mentioned, this becomes 24.

Totalling the visitor and apartment visitor spaces increases the allocation to the Haybluff Drive side of the proposed development to 31 visitor spaces ($(7+27 \text{ (courtyard)} - 3 \text{ (to be allocated)})/185 = 31/185 = 16.8\%$). The NHC SPD requires between 47 and 139.

This shows visitor space allocation is insufficient on the Haybluff Drive side of the proposed development with only 6.7% allocation in respect of on-street parking or 16.8% when considering on-street and apartment courtyard visitor parking. This falls far short of the minimum 0.25 spaces per dwelling as stated in the above table from the SPD.

Under-allocating visitor spaces on the proposed Haybluff Drive extension could lead to unnecessary journeys via the already struggling Calder Way to access visitor spaces on the Back Lane side of the proposed development. The Applicant's Transport Assessment states that 'the proportion of traffic looking to travel north or west would be relatively small' and this new design would 'limit the increase in traffic on Back Lane as far as is reasonably practicable'. This disproportionate allocation of visitor spaces is not in keeping with the Applicant's aim.

GACC requests this under-allocation of visitor space on the Haybluff Drive section is rectified prior to any planning approval being granted.

EV Charging

Plots 71, 93, 130 have not been allocated parking and EV charging points are therefore missing for these units.

Indicators showing EV Charging points have been missed from several dwellings, for example plots 94 and 152.

Solar Panels

The Applicant's cover letter states that 'having reviewed orientations' they would be willing to accept a minimum of 25% rooftop solar panels. GACC recognise that 81 out of the 281 units are apartments, which amounts to 28.8%. This commitment to install solar panels on as little as 9 buildings falls way short of the incoming Future Homes Standard. On 6 June 2025, Government Ministers confirmed that the Future Homes Standard, due to be published this autumn, will include solar panels as mandatory for new build homes. We feel that the site layout should accommodate for all homes to benefit from solar panels and that these should be installed as standard on all buildings by the developer together with battery storage.

Kind regards,

Great Ashby Community Council