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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: 25/01696/OP
HCC ref: NH/25772/2025
HCC received: 10 December 2025
Area manager: Manjinder Sehmi
Case officer: Samuel Tearle

Location

Land South East Of Holwell Road And North Of Hambridge Way, Pirton, Herts

Application type

Outline

Proposal

ADDITIONAL INFORMATION

Outline application for the erection of up to 130 dwellings with public open space, landscaping, sustainable drainage system (SuDS), and associated works with all matters reserved save for access

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 due to the submission of insufficient information, and require the applicant to:

- Submit an Outline CTMP as detailed in the CTMP subsection below;
- Provide an active travel access from the north west corner of the site to Howell Road / Drovers Way, and from the south of the site onto PRoW 21.
- Confirm S106 request to offset the impact of the application.

Once these details are submitted and found to be satisfactory, the Highway Authority will be in a position to raise no objection.

COMMENTS / ANALYSIS

Background

Following the issue of the Highway Authority consultee response dated 11th August 2025, the Applicant has provided a Transport Note (received 2nd December 2025) in response to the matters raised.

This new consultee response addresses the comments made in the Applicant's Transport Note, highlighting outstanding issues and matters for further consideration.

Policy Review

NPPF (2024) and the Draft NPPF 2025 places strong emphasis on a vision-led approach to transport (paragraphs 109, 115, 117 and 118), prioritising walking, cycling and public transport and seeking to reduce reliance on private car use.

The Applicant has submitted an updated Transport Connectivity Study, which include an updated vision for the site, centred on promoting sustainable travel and providing choices to new residents. However, it remains unclear how the development has been shaped by a vision-led approach from the outset or how opportunities to enhance sustainable travel have been actively pursued in line with National and Local Policy. There remains significant scope to better realise the site's vision through the provision of improved sustainable transport infrastructure and services.

A review of the North Hertfordshire District Local Cycling and Walking Infrastructure Plan (LCWIP), Cycle Infrastructure Design – Local Transport 1/20 (2020), and Inclusive Mobility (2021) would strengthen a vision-led approach to accommodating the proposed development.

Overall to resolve this issue, the Highway Authority have requested contributions towards bus service improvements and PRow improvements as set out in the Planning Obligations subsection below.

Sustainability and Accessibility

Walking and cycling

The Highway Authority welcomes the audit of walking routes conducted by Applicant through a site visit in January 2025, supplemented by photographs and direct observation of routes and desire lines from the site to key village destinations. However, the nature of this audit does not appear to have been undertaken in accordance with the Active Travel England (ATE) Route Selection Tool or fully consider the suitability of existing cycle provision, beyond the scarcity cycle parking.

The submitted Transport Connectivity Study identifies the following two routes from the proposed site:

1. Coopers Elms → Drovers Way → Hambridge Way → High Street
2. Existing active travel provision along the western edge of the site → Bridleway 21 → Hambridge Way → High Street

The applicant's study identifies that walking and cycling connectivity is constrained by discontinuous footways, the absence of tactile dropped kerbs and dedicated cycle infrastructure. The Highway Authority acknowledges these constraints, but considers that greater emphasis should have been placed on identifying and providing further off-site measures to enhance sustainable accessibility and deliver on a vision-led approach. This would strengthen alignment with NPPF paragraph 109(e) and HCC LTP4 Policies 1, 2 and 5.

To support the vision of the site, the proposed development is expected to increase usage of nearby Public Rights of Way (PRoW). The Highway Authority considers that proportionate surface and accessibility improvements, which may include lighting, to PRoWs 21,006,019,005,001,UCR1 would represent appropriate mitigation to accommodate increased usage and to improving and year-round accessibility for pedestrians, cyclists and equestrians. This would be in alignment with LCWIP, which supports improvements on the Hambridge Way path connecting Pirton to Hitchin. Therefore S106 contributions towards PROW improvements have been set out in the Planning Obligations subsection below.

It is also noted that the updated route audit does not consider routes to the north of the proposed development, include along Holwell Road to the nearest bus stop. If the applicant truly wishes to provide a sustainable site, then maximising the pedestrian connections must be undertaken, at minimum a connection from the north west of the site to Howell Road / Drovers Way must be provided.

Public Transport

The Highway Authority welcomes the Applicant's willingness to provide financial contributions towards improvements to bus services, including increased service frequency and the extension of operating hours later into the day. This would improve connectivity between existing and new communities within Hitchin and the surrounding area. Therefore, bus service improvements have been set out in the Planning Obligations subsection below.

However, the Highway Authority notes that the submitted Transport Note does not include measures to upgrade bus stop infrastructure. This omission risks the proposed development's potential to realise its stated Vision. Consideration should have been given to the provision of shelters, seating, ramps to assist mobility-impaired users, Kassel kerbs or real-time passenger information to enhance the user experience on Holwell Road. In addition, limited consideration has been given to improving the quality and continuity of pedestrian and cycle routes leading to bus boarding locations, including the provision of safe crossing facilities, tactile paving and dropped kerbs. Therefore, bus stop infrastructure has been requested under the Planning Obligations subsection below.

Access

Main Access

The Highway Authority acknowledges that the Applicant has provided an annotated site access arrangement plan in the submitted Transport Note. The proposed access via Coopers Elms, including the extension of the carriageway and provision of 2m footways on both sides, is in accordance with HCC Place and Movement Design Guidance. Annotated plans and visibility splay details have been provided, and the Applicant has recognised the need for safe and suitable access for all users, including connections to neighbouring sites.

However, while the main access arrangements are considered appropriate, the Applicant is reminded that all detailed design elements—such as final visibility splay measurements, dropped kerbs, tactile paving, and any necessary amendments arising from the S278—must be clearly demonstrated and secured. The Highway Authority expects these details to be addressed in the next stage of design to ensure full compliance with the HCC Place and Movement Design Guidance.

Emergency Access

The Highway Authority notes that the Applicant has provided further details of the proposed emergency access routing via Hambridge Way within the submitted Transport Note. This clarifies that the bridleway (PRoW 21) formally begins east of the emergency access junction, meaning the bridleway itself is not directly disturbed by the proposed access.

Internal Layout

The Highway Authority reiterates its previous comments regarding the internal layout of the proposed development. The application is currently in Outline, and detailed design of internal routes, footways, and cycleways will be determined at the Reserved Matters stage. It is essential that the internal layout complies with HCC Place and Movement Design Guidance and Manual for Streets, ensuring safe, direct, and convenient routes for pedestrians, cyclists, and mobility-impaired users. As such, consideration should be given to enabling a more direct link onto the existing western active travel route boundary route, via the proposed green space in the site's southwest extent. This would enable cyclists to access PRoW 21 and Hambridge Way without potential diversion via the main access on Cooper Elm.

The Applicant is also reminded to incorporate high-quality pedestrian environments, adequate cycle parking, and inclusive design features in the detailed layout to support sustainable travel and accessibility for all future residents.

Parking

The Highway Authority acknowledges that the Applicant has confirmed parking provision across the site will be in accordance with local standards, ensuring residents do not need to park on the surrounding highway. The Revised Framework Travel Plan also commits to providing secure and covered cycle parking for residents and visitors, with periodic review of this provision. This should be in alignment with LTN 1/20 guidance. The provision of electric vehicle charging facilities for all dwellings in accordance with Building Regulations, as set out in the submitted Transport Note is welcomed. Further consideration of blue badge bays will be required in due course. Details and drawings will be reviewed at the Reserved Matters Stage.

Trip Impact Assessment

Trip Generation and Distribution

The Highway Authority notes that the Applicant, has provided updated trip generation calculations based on ATC surveys at the adjacent Cala Homes scheme and has forecast multi-modal trip generation using 2011 Census data for MSOA 014. The submitted Revised Framework Travel Plan includes mode share targets, aiming for a 10% reduction in single-occupancy car trips over five years.

The Highway Authority notes that the updated trip distribution is based on 2011 Census data for MSOA 014 and Google Maps routing for commuting trips. However, the analysis is limited to work trips and does not consider other journey purposes or sustainable modes. The Highway Authority recommends that assessments include non-work trips and active travel to better inform targeted mitigation and S106 contributions, in line with a vision-led approach.

While the Applicant recognises a policy shift towards vision-led planning, their response suggests that the rural context and scale of the development limit the extent of sustainable transport interventions that can be reasonably required. The Applicant maintains that only minor improvements are justified and that significant mitigation proposals would not meet planning obligation tests for a development of this size.

The Highway Authority, however, considers that there remains significant potential to reduce private car trips and promote sustainable travel through enhanced walking and cycling connectivity to nearby amenities and local bus services. Improved active travel links and high-quality pedestrian and cycle access to local facilities and public transport can support a genuine modal shift, in line with the vision-led approach advocated by National and Local policy. Further details of proposed contributions and schemes are discussed below.

Highway Impact

The Applicant has included queue survey data in the submitted Transport Note but has not summarised this information or presented a validation table within the main report. While the observed and modelled queues appear to be within acceptable tolerances for rural junctions, we reiterate that best practice is to include a validation table in the main assessment to clearly demonstrate model reliability and address issues in our previous consultee response.

Travel Plan

The submitted Revised Framework Travel Plan addresses several key requirements:

- Appointment of a Travel Plan Coordinator (TPC) prior to first occupation, with an interim contact named.
- Commitment to annual monitoring and review, with reports to be submitted to HCC.
- Provision of travel packs to residents, including public transport information and discount vouchers.
- Baseline and ongoing travel surveys, with targets to be updated following baseline data collection.
- Confirmation that the TPC will liaise with HCC and use the Modeshift Starts accreditation platform.
- Developer to fund implementation, management, and monitoring of the Travel Plan.

However, the following points are not explicitly confirmed and require clarification:

- Provision of a secondary TPC contact prior to occupation.
- Estimated time commitment for the TPC role (anticipated as 2 days/month but not confirmed).
- Specific rate for travel packs (£50 per flat, £100 per house).

The Applicant must note that a full Travel Plan will be required for the site and must be in place from first occupation until five years post-occupation, in accordance with HCC guidance. A £1,200 per annum Evaluation and Support Fee is required for this period.

Planning Obligations

It is acknowledged that Pirton is not of a size to be 'self-contained' in terms of facilities and amenities, and therefore in order to make the Site acceptable in planning terms (NPPF, DfT Decarbonisation Plan, DfT Gear Change, HCC LTP) and offer future occupants realistic and suitable opportunities to travel sustainably for medium distance trips (and thus reduce car dependency), bus service contributions are sought.

The bus service contributions fall within Strand 1 of the HCC Highways Planning Obligations Toolkit and require contributions of £800k over a five-year period (£160k per year subject to SPONS indexation Jan 2026). At present, this contribution will link to service Bus Service 89 (Henlow Camp–Hitchin via Pirton, however, this will not be limited to this service due to the changes in bus franchising / operators and a stand alone service may be required.

Under Strand 2 of the HCC Highways Planning Obligations Schedule, contributions are sought for the delivery of active travel infrastructure. This is essential in order for the development to enable active travel trips in the area, with a focus on enhancing cycle connections (an area which the applicant has been unable to demonstrate and deliver a scheme which meets NPPF para 116 a & c). Under Strand 2 of the schedule, contributions of £9,861 per dwelling are required, which equates to a total of £1,281,930 (SPONS March 2024). This will be used for schemes including, but not limited to Improvements to LCWIP routes, specifically High Street and a scheme of PROW improvements to Hitchin where most major facilities and amenities are located, including Hambridge Way (PROW 21) and enhancements as far as Bedford Road, Bedford Road active travel scheme, PIRTON 006 / ICKLEFORD 019 (bridleway to the junction with Westmill Lane), PIRTON 005 (footpath along Westmill Lane), HITCHIN 001 (restricted byway along Westmill Lane), HITCHIN UCR1 (unclassified road along Westmill Lane to the settlement edge of Hitchin). Additionally contributions will be used for bus stop upgrades at Holwell Road and nearby stops (including shelters, Kassel kerbs, RTI, etc.)

and improvement to bus stop accessibility at Holwell Road by walking and cycling. On the basis the applicant has not committed to delivering the improvements to walking routes identified in their own submitted 'Transport Connectivity Study', then the requested Strand 2 contributions may also be used for these improvements being (1) Junction improvements at Walnut Tree Road / Hambridge Way / Royal Oak Lane / High Street to improve pedestrian and vehicular movements, (2) Provision of tactile paving at the junction of High Street / Cromwell Way, (3) Junction improvements at High Street / Coleman's Close / Crab Tree Lane to provide safe pedestrian crossings, including routes to the local school, (4) Provision of cycle parking on the High Street.

These contributions and works are fundamental to mitigate the development's impact, support sustainable travel, and ensure compliance with national and local policy objectives. The Applicant is requested to confirm agreement to these obligations.

Construction Traffic Management Plan

The Highway Authority requires the submission of an outline Construction Traffic Management Plan (CTMP) at this stage to ensure construction vehicle would not have a detrimental impact on the highway network. Reports of significant impacts to the operation of the highway network caused by other recent developments in Pirton has meant an Outline CTMP is required now, and should the application be approved a Full CTMP required by way of condition.

It is recommended the Outline CTMP utilises the measures and routing plans that were found to suitably worked for recent developments, and avoid issues previous experienced. The Outline CTMP must include:

- a. Construction vehicle routing for HGVs;
- b. Access arrangements to the site;
- c. Traffic management requirements
- d. Construction and storage compounds (including areas designated for car parking, loading /unloading and turning areas);
- e. Confirmation that wheel washing facilities and Cleaning of site entrances, site tracks and the adjacent public highway will be undertaken;
- g. Timing of construction activities (including delivery times and removal of waste) and to avoid school pick up/drop off times;
- h. Confirmation that sufficient on-site parking will be provided prior to commencement of construction activities;
- i. Any Post construction restoration/reinstatement of the working areas and temporary access to the public highway;
- j. where works cannot be contained wholly within the site a plan should be submitted showing the site layout on the highway including extent of hoarding, pedestrian routes and remaining road width for vehicle movements.

Conclusion

The Highway Authority wishes to raise an objection due to the need for the applicant to:

- Submit an Outline CTMP as detailed in the sections above.
- Provide an active travel access from the north west corner of the site to Howell Road / Drivers Way, and from the south of the site onto PRoW 21.
- Confirm the S106 request to offset the impact of the site.

Once these details are provided, and found to be satisfactory, the Highway Authority will be in a position to raise no objection subject to agreement on the S106 Contributions.

Signed

Samuel Tearle

4 February 2026