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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: 26/00705/FP
HCC ref: NH/29440/2026
HCC received: 8 June 2026
Area manager: Manjinder Sehmi
Case officer: Senober Khan

Location

Connor Gardens, Danesbury Park Road, Welwyn, Hertfordshire, AL6 9SN

Application type

Full Application

Proposal

Full Planning Permission : Change of use of land to residential static caravans/park homes to include footpath extension, parking, improved access points and associated landscaping (including changing the levels of part of the quarry area) and infrastructure

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:

The proposal is therefore contrary to the NPPF (2024 and emerging 2025), Hertfordshire LTP4 Policies 5 and 6, and the Hertfordshire Place and Movement Planning and Design Guidance. On this basis, the HA cannot support the application on highway grounds.

Highways comments:

This application seeks planning permission for the change of use of land to residential static caravans/park homes, including the provision of a footpath, parking, improved access arrangements, and associated landscaping works, including changes in levels within part of the quarry area and associated infrastructure at Connor Gardens, Danesbury Park Road. The applicant is therefore seeking to establish a residential use in this rural location with associated highway and access arrangements.

The Highway Authority (HA) has reviewed the submitted Transport Statement (TS), proposed site layout drawings, access arrangements, and supporting documentation accompanying the application.

Site accessibility and footway provision

The HA acknowledges that the proposal includes the provision of a new footpath within the site and along its frontage, which is welcomed and supported. However, both the proposed provision and the submitted TS fail to demonstrate any meaningful or functional connectivity to the wider pedestrian network or to key local destinations. In particular, the proposed footpath does not connect to the existing footway to the south along Pottersheath Road, due to the absence of any safe or suitable crossing facilities across the carriageway, which is subject to the national speed limit (60mph). The lack of any formal crossing provision in this high-speed environment represents a significant barrier to pedestrian movement and renders this connection unsafe and impractical in practice.

Furthermore, at the northern extent of Pottersheath Road, pedestrian routes are constrained by overgrown vegetation, limited carriageway width and the absence of any defined or safe continuation of footway provision. This forces pedestrians into the carriageway or informal verges in close proximity to vehicular traffic, thereby significantly increasing the level of risk. As such, the proposed footpath would remain isolated and would not function as part of a safe, continuous or usable pedestrian network.

These deficiencies extend beyond the immediate site frontage and persist along the wider route to key destinations, including the nearest bus stops located along Great North Road. The route as a whole is characterised by the absence of footways, lack of street lighting, exposure to high-speed traffic and no safe crossing opportunities. Consequently, the TS fails to demonstrate that safe and suitable pedestrian access can be achieved to these destinations.

In light of the above, the HA considers that the applicant has not adequately assessed or addressed pedestrian safety. A comprehensive pedestrian safety audit of the desired routes to key destinations, including public transport, is required to properly assess the risks and determine whether any realistic or deliverable mitigation could be secured. However, based on the existing constraints, there is no clear or achievable prospect of providing a safe, policy-compliant pedestrian connection.

Local highway character and safety environment

The site is located within a rural area characterised by narrow, predominantly single-lane carriageways with no continuous footway provision along Danesbury Park Road or Pottersheath Road. Both roads are subject to the national speed limit (60mph), with limited forward visibility and an absence of street lighting, creating an environment that is unsuitable for pedestrian movement.

Danesbury Park Road is also a highway not maintainable at public expense, which limits the ability of the HA to secure or ensure the long-term delivery and maintenance of safe and policy-compliant infrastructure improvements. The existing highway environment is therefore hostile to non-motorised users and fails to provide a safe or inclusive setting, particularly for vulnerable users.

Accessibility to public transport, sustainability and policy conflict

A key and overriding concern for the HA is the site's poor accessibility to public transport. The nearest bus stops are located approximately 1.4km from the site, which is significantly in excess of the widely accepted 400m walking threshold for residential development, and even exceeds more flexible rural benchmarks. This distance alone renders the site poorly related to public transport; however, the situation is materially worsened by the absence of any safe or suitable walking route.

Pedestrian access to these bus stops requires movement along and across Danesbury Park Road and Pottersheath Road, both of which are subject to the national speed limit (60mph), with no continuous footway provision, no street lighting, and no safe crossing facilities. As such, pedestrians would be required to walk along the carriageway or verge in close proximity to high-speed traffic, creating a significant and unacceptable highway safety risk. This environment is entirely unsuitable for day-to-day pedestrian use and would effectively preclude access to public transport for the majority of users, particularly vulnerable groups.

The HA therefore considers that the site does not provide genuine opportunities for sustainable travel, and the excessive distance combined with the unsafe walking environment means that access to public transport cannot reasonably be relied upon.

This is directly contrary to the objectives of the NPPF (2024), and particularly the strengthened direction within the emerging draft NPPF (2025), which places clear emphasis on locating development where there is safe, suitable and convenient access to public transport. The proposal also fails to accord with Hertfordshire LTP4 Policies 5 and 6, which seek to maximise accessibility by sustainable modes and reduce reliance on the private car, as well as the Hertfordshire Place and Movement Planning and Design Guidance, which requires development to be well-connected to public transport by safe and direct walking routes.

In these circumstances, future occupiers would realistically have no viable alternative to private car use, and the proposal must therefore be regarded as an unsustainable form of development in transport terms..

Highway Safety and Access Constraints

In addition to the above, the HA has significant concerns regarding the safety and suitability of the surrounding highway network and the proposed access arrangements.

The application proposes the provision of two separate vehicular access points onto Danesbury Park Road. The HA does not support this approach. The provision of multiple access points in this rural, constrained and high-speed environment increases potential conflict points, introduces unnecessary vehicle turning movements, and is detrimental to overall highway safety. A single point of access is considered more appropriate in principle, reducing conflict and allowing for a more controlled and safer access arrangement.

Furthermore, the proposed access(es) have not been demonstrated to be designed in accordance with best practice guidance. Access points should be designed to achieve a near perpendicular alignment (i.e. 90 degrees) to the carriageway, and not angled as shown on the plans, in order to maximise intervisibility between drivers and to allow vehicles to enter and exit the site in a safe and controlled manner. The submitted layout does not clearly demonstrate that this can be achieved, particularly given the constraints of the site frontage and the alignment of Danesbury Park Road.

The submitted information fails to demonstrate that appropriate visibility splays can be delivered or maintained in perpetuity. Given that Danesbury Park Road is subject to the national speed limit (60mph), the appropriate design standard in this instance is the Design Manual for Roads and Bridges (DMRB), rather than Manual for Streets (MfS), which applies to lower-speed environments.

This requirement is particularly relevant in this case, as Danesbury Park Road comprises a relatively straight section of carriageway in the vicinity of the site, which can result in higher approach speeds. Despite this, the applicant has not demonstrated that DMRB-compliant visibility can be achieved within land under their control or maintained free from obstruction over the lifetime of the

development. Without this information, the HA cannot be satisfied that safe and suitable access can be provided in accordance with national design standards.

In addition, the constrained width, informal alignment, and rural character of the surrounding road network raise concerns regarding the ability of larger vehicles, including emergency and service vehicles, to safely and reliably access and manoeuvre to and from the site. The geometry of the carriageway and junctions is likely to result in vehicles overrunning verges or opposing carriageway space, increasing the risk of conflict and potential damage to the highway and surrounding environment.

Taken together, the proposed access arrangements and the characteristics of the surrounding highway network fail to demonstrate compliance with the requirements of the NPPF (2024 and emerging 2025) to provide safe and suitable access for all users, and do not accord with the design principles set out within DMRB, MfS (in terms of access geometry principles), and the Hertfordshire Place and Movement Planning and Design Guidance.

Overall Conclusion

Overall, notwithstanding the relatively low level of traffic generation associated with the proposal, the fundamental issue for the HA is the site's location within an isolated and poorly connected rural area where safe, suitable and sustainable access cannot be achieved. The proposed footpath provision does not overcome these inherent deficiencies and fails to provide a meaningful connection to the wider pedestrian network. The development would result in an unacceptable reliance on the private car and does not provide a safe or inclusive environment for pedestrians and other non-motorised users.

Recommendation:

The proposal is therefore contrary to the NPPF (2024 and emerging 2025), Hertfordshire LTP4 Policies 5 and 6, and the Hertfordshire Place and Movement Planning and Design Guidance. On this basis, the HA cannot support the application on highway grounds.

Signed

Senober Khan

29 June 2026