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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: 25/01708/OP
HCC ref: NH/25777/2025
HCC received: 18 July 2025
Area manager: Manjinder Sehmi
Case officer: Senober Khan

Location

Land Opposite Heath Farm, Briary Lane, Royston, Hertfordshire, SG8 9BB

Application type

Outline

Proposal

Outline Application : Erection of up to 84 dwellings with public open space, landscaping and sustainable drainage system (SuDS) following demolition of No. 24 Echo Hill 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 for the following reasons:

Until appropriate measures are proposed to ensure all dwellings are within a reasonable walking distance of a bus stop, in line with national and local policies, the HA cannot support the proposals due to the application has failed to demonstrate a satisfactory policy and design-led approach to the accessibility of the proposed development contrary to Hertfordshire's Local Transport Plan (LTP4) policies 5 and 6 and also contrary to the principles of sustainable development contained in the NPPF and other included policies.

Brief Description in support of Proposed Development by the applicant:

This Transport Assessment (TS) has been submitted in connection with a proposed development of 84 residential dwellings on land to the south of Echo Hill, Royston.

Executive Summary

The site can be accessed by sustainable forms of transport such as walking, cycling, bus and rail. The town centre shops are available within an 11minute walk and bus services are available throughout the day to local destinations. The Royston railway station is available within a short cycle ride where cycle and car parking is available at the station.

Vehicular access for the site will be via Echo Hill with an access provided in place of No 24 Echo Hill, which will be demolished.

The nationally recognised database TRICS has been used to forecast the new trips for the proposed development. The scheme is forecast to generate the following vehicle trips in a typical weekday peak hour which is a negligible impact on the highway network:

- 37 two-way vehicle trips in the morning peak hour (0800-0900);
- 38 two-way vehicle trips in the evening peak hour (1700-1800).

The scheme will not result in a highway impact that could be considered as severe in relation to the requirements of the National Planning Policy Framework.

The development would be supportive of improvements to footway infrastructure and travel plan measures to incentivise first dwelling occupants to consider non-car modes of travel where possible.

A Framework Travel Plan is submitted with this application. A full Travel Plan will be provided at Reserved Matters stage and secured by condition or Section 106 obligation. The Travel Plan would encourage sustainable travel to all site users by promoting a range of sustainable travel measures. The Travel Plan will be monitored over at least 5 years with the aim of achieving a set of agreed targets over the period.

Previous Applications

There was a previous application submitted to North Hertfordshire Council for a residential development of up to 120 dwellings and associated open space and green infrastructure in 2018 (18/00747/OP). That application was refused in January 2019 for a variety of reasons including landscape and use of Briary Lane.

This report assesses the proposed access, which is now proposed from Echo Hill, rather than Briary Lane.

In respect of highway impact comments provided by Hertfordshire County Council, an objection to the application was given, citing:

DfT's Inclusive Mobility, HCC's Passenger Transport in New Developments, The Chartered Institution of Highways Transportation (CIHT) guidance 'Buses in Urban Developments' published in January 2018 and the 'Roads in Hertfordshire Design Guide' (3rd Edition January 2011) state that development layouts should be designed such that all occupied areas are no more than 400m walking distance

from a bus stop. There are no bus stops within 400m of the proposed development and to be considered sustainable any new or re-routed service to the proposed housing must have a good chance of being commercially viable after developer pump-priming contributions have been exhausted. The Highway Authority has examined the options for servicing the development route by route in order to

establish the viability of the public transport options in the longer term. It has concluded that it is unlikely that a satisfactory route would be available in the longer term. Accordingly, it is considered that the proposed development would be unlikely to benefit from a satisfactory bus service beyond the short term with residents being denied access to high quality public transport contrary to the aims

of the NPPF, Policy T1 (assessment of transport matters) of the Emerging Local Plan and HCC's Local Transport Plan 4.

The objection reasoning appears to have been based upon the site being in excess of the 400metre distance to the nearest bus stop, and on this basis the site was determined as not being 'sustainable'.

However, this is not a reasonable reason upon which to base an objection to a planning application. The CIHT guidance 'Buses in Urban Developments', 2018, promotes the 400-metre criteria as an aim by which to shift mode share from car to bus.

An application for 99 dwellings (20/00744/OP) was refused in April 2021 but was not refused on transportation grounds.

The site is presently an agricultural field land and one existing residential property.

The proposed vehicle access requires the demolition of 24 Echo Hill. Echo Hill and the surrounding residential streets have a system of street lighting and footways throughout and are subject to a speed limit of 30mph.

Briary Lane forms the western boundary of the site, which is a public bridleway (013) and access for motor vehicles is not permitted.

The local highway incident data for the site area has been reviewed for the last available 5-year period of data between 2019-2023, using Crashmap.co.uk. There are no recorded incidents within the vicinity of the site.

In general, the site is located in a highly accessible area, close to a range of key daily services and facilities, public transport services, and is bordered by residential dwellings to the north and east.

In relation to the key daily needs, bus stops, schools, supermarkets, health services and a variety of Royston pubs and restaurants, all within walking distance of the site.

Public Bridleways 13, run along the west boundary of the site and bridleway 14 runs along the southern boundary. Both paths offer the potential for encouraging cycling as well as walking trips from the site and onward to locations in Royston.

Royston bus station is on Barkway Street. There are two stops with waiting shelters, timetable information and seating.

The walking route and distance between the site and the bus station, when an additional allowance of 150metres is included to the centre of the site, it is approximately 800metres or a 10minute walk. The walking environment to the bus station, along Echo Hill and Sun Hill is a pleasant route, lightly trafficked, with footways and street lighting, with a noted though reasonable gradient and overall a 10 minute walk would be acceptable.

Some improvements to the footways, such as tactile paving and dropped kerbs would be supportive of the walking route to the bus station. However, the site is well located close to the town centre to not be reliant on bus services.

The proposed development would not be of a scale to necessitate to support a new service or reroute an additional service.

Proposed Development

The proposed development is for 84 residential dwellings, to be submitted as part of an Outline Planning Application.

Access Arrangements

Vehicle access to the site will require the demolition of No. 24 Echo Hill. The site access road is proposed to connect with Echo Hill at this location with an altered priority to serve the proposed development.

The dwellings to the west of the new access that form the remainder of Echo Hill and The Dell will form a priority junction.

Visibility splays are shown at 2.4metres x 25metres and 2metre footways are provided both sides of the access, compliant with the HCC Highway Design Guide, 3rd edition, Table 4.1.1.1.

A Stage 1 Road Safety Audit has been undertaken on this new junction layout proposal with the sole purpose of identifying any features of the design that could be removed or modified in order to improve the safety of the scheme.

Two points were raised, which have been resolved via design amendment through the designer's response.

- It is recommended that suitable dropped kerbs and tactile paving is installed to assist pedestrians crossing at the location. - Agreed and would expect to be provided as part of a S278 highways agreement.

- It is recommended that suitable forward visibility (stopping site distance) is provided at the bend, and that the visibility splays should be adopted for control by the Highway Authority or that Covenants should be in place to ensure that no structures or planting is allowed to block visibility - Visibility splays are demonstrated, compliant with the likely 20mph speed of traffic in this location. The splays fall within land under the applicant's ownership and which has the potential to be adopted under the control of the Highway Authority

Emergency vehicles would make use of the proposed access which is consistent with previous requirements from the council.

In a previous planning application for 99 dwellings, under planning application reference 20/00744/OP, a separate emergency access from Briary Lane was not required. Paragraph 8.1 of the Hertfordshire County Council Highway Authority officer response stated:

The LPA has requested that Briary Lane is not promoted as an emergency access. HCC highways has confirmed to the applicant that the proposed development does not need an emergency access and some local residents have expressed concern that Briary Lane traffic may increase if misused by residents.

The proposal is seeking outline planning consent and therefore matters concerning the internal site layout is not part of this application. Car parking standards for residential uses are noted as provided in Appendix 4 of the North Hertfordshire Local Plan 2011-2031.

Trip Generation & Impact

Vehicle trip generations for the proposed development of 84 dwellings have been derived from the TRICS database.

A residential development of 84 dwellings will generate the following weekday peak hour vehicle trips of:

- 38 two-way vehicle trips in the morning peak hour (0800-0900);
- 39 two-way vehicle trips in the evening peak hour (1700-1800);

This would represent just over 1 additional car trip every 2 minutes at peak network travel periods and therefore this cannot be considered as representing a significant or severe impact in relation to the NPPF. Therefore, no further assessment is necessary.

Mitigation Measures

Some improvements to the footways, such as tactile paving and dropped kerbs would be supportive.

The bus station is located around an 11minute walk or around 800metres from the site and therefore there is no requirement to route a bus into the proposed site, nor would the scale of development justify this.

Construction Management

A Construction Management Plan is likely to be a condition of planning permission to manage vehicular activity in and around the site. This will cover matters such as a contractor's compound, lorry routes to and from the site, contractors parking, hours of operation and other matters.

Conclusions

The development would be supportive of improvements to footway infrastructure and travel plan measures to incentivise first dwelling occupants to consider non-car modes of travel where possible.

It can be concluded that the development proposals pose a minimal impact upon the local highway network. The development should not be refused on highway grounds.

Highways comments:

The application is an outline planning application for the erection of 84 residential dwellings including a new access arrangement from Echo Hill with all matters reserved except means of access.

The proposed car parking provision and layout is the responsibility of the LPA to determine the level and suitability of the car parking proposals, however, it is essential that it is operated in efficient and safe manner to minimise the impact on the local highway network which is the responsibility of the HCC HA.

As noted in the TA, the previous outline planning application (20/00744/OP) for 99 dwellings (all matters to be reserved for later determination save site vehicular access), was refused in April 2021 but was not refused on transportation grounds.

The HA has reviewed the submitted documents and has the following comments to make:

The HA acknowledges that the development as proposed is not expected to have any significant/detrimental impact on the operation and safety of the local highway network.

Whilst in the previous outline application the HA raised no objections, however that was in 2020, over time policies, guidance's, and designs are not static, they are continually evolving to be commensurate with current thinking, technology, priorities, etc. since then priorities in local and national policies have changed which now give greater weighting to ensuring developments are accessible by sustainable forms of transport such as walking cycling and in particular public

transport in new developments. If the position is that the overall development proposals are no different to an approved in the past, then no improvements under current policies and guidance's can ever be implemented.

With new builds the planning process seeks/provides the opportunity to improve conditions for both development and highway safety by applying current policies, higher standards of design/guidance's, build and safety to new developments, and not to retain and/or continue with past obsolete standards.

Both Hertfordshire County Council and national policies place strong emphasis on the importance of accessibility to bus services, in planning policy.

UK planning and transport policies have increasingly emphasised the importance of public transport accessibility as a means to reduce car dependency, meet emissions targets, and improve public health and safety. Here are some key developments:

Inclusive Transport Strategy (2020–2024)

The UK Government's Inclusive Transport Strategy aimed to ensure that transport systems are accessible to all, particularly disabled people. The 2025 evaluation of this strategy highlighted: A need for stronger integration of accessibility in planning and design. Emphasis on reducing barriers to travel, especially for disabled and older people. Recommendations for future policies to embed accessibility as a core requirement in development planning.

National Centre for Accessible Transport (NCAT) Strategy (2025–2027)

NCAT's strategy focuses on:

Evidence-based planning to close the transport accessibility gap.

Promoting human-centred design in transport systems.

Highlighting that 92% of disabled people face barriers when using at least one mode of transport, which affects journey frequency and duration.

Parliamentary Commitments

Recent debates in Parliament reaffirm the goal of making accessibility standard across the transport network, with particular attention to safety and inclusivity for all users.

The NPPF (2023) states:

“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.” (NPPF, Paragraph 105)

“Planning policies should support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.” (NPPF, Paragraph 106)

“Planning policies and decisions should ensure that developments:

- give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas;
- have access to high quality public transport facilities.” (NPPF, Paragraph 112)

Hertfordshire's LTP4 and Accessibility Strategy reinforce these principles:

- LTP4 Objective: “Deliver a transport system that provides access for all and supports economic growth.”

- Accessibility Strategy: Emphasises the need for residents to be within reasonable walking distance of key services, including bus stops.

While there is no absolute national standard, HCC use 400m (depending on highway conditions 600m if no gradients/hills etc) as a reasonable walking distance to a bus stop. The nearest bus stop distance measured for the furthest dwelling (not centre of the site) is approx. 1km, this distance is considered beyond acceptable thresholds, especially for:

- Older adults
- People with disabilities
- Families with young children

In contrast the applicant feels that funding improved bus service is not feasible:

- There is no requirement to route a bus into the proposed site, nor would the scale of development justify this.
- The proposed development would not be of a scale to necessitate to support a new service or reroute an additional service.

A development where the furthest dwelling is around 1km from a bus stop is contrary with all the above listed policies, therefore considered unsustainable in both transport and policies terms leading to the HA to recommend refusal. However, the HA would review its decision if the applicant identified and funded robust mitigating measures such as improving accessibility to bus services (this would be required to be in place prior to occupation of development).

In the TA it also states that “The development would be supportive of improvements to footway infrastructure” and “Some improvements to the footways, such as tactile paving and dropped kerbs would be supportive of the walking route to the bus station.”, however nothing has been identified, and no robust study has been undertaken to commit to implementing the measures.

The Highway Authority will require a pedestrian/cyclist audit to be undertaken to key destinations identifying whether any deficiencies that create barriers to vulnerable road users currently exist and submit proposals/measures to rectify such barriers along key desire lines and improve linkages including in and around public transport. Any improvements identified in the audit (dropped kerbs, tactile paving, pedestrian crossings, cycling, etc) will be required to be delivered under a S278 agreement, to ensure that the surrounding infrastructure, such as roads, cycleways, footways and footpaths, can handle the changes brought by the proposed development, in accordance with the relevant policies and guidance’s in supporting sustainable travel.

It is Hertfordshire County Councils policy to seek a planning obligation in respect of Sustainable Transport including for all developments. The revised NPPF -July 2021 promotes accessibility by sustainable means including bus, cycling, and walking, and the provisions of S106 of the Town and Country Planning Act-1990 allows that planning obligations, governed by the guidance within CIL Regulations may be used to mitigate the impact of development. HCC adopted a new toolkit to seek planning obligations towards sustainable transport. Full details on HCC’s policy towards planning obligations may be found at the following web address
<https://www.hertfordshire.gov.uk/about-the-council/freedom-of-information-and-council-data/open-data-statistics-about-hertfordshire/who-we-are-and-what-we-do/property/planning-obligations-guidance.aspx#developercontributions>

Based on the above, the county council will actively seek planning obligations which will improve sustainable transport facilities and services for passenger transport users who are using the development and generally for those users in the surrounding area. The headline figure as stated in our Toolkit is £9,861 per dwelling (i.e., the average amount each new dwelling across the county

needs to pay in order for the necessary new infrastructure to be delivered). Multiply this by 84 dwellings = £828,324 (index linked by SPONS to March 2024).

Travel plan

The Sustainable Mobility Officer of the Active & Safer Travel Team has reviewed the document, please see attached word document of their RAG assessment.

(word document cannot be attached to this document, please see separate email with RAG comments sent to case officer)

Signed

Senober Khan

6 August 2025