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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: 18 July 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**

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 except 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 as it is currently contrary to HCC LTP Policy 1, Policy 2, Policy 4, Policy 5 and NPPF Paras 109, 115, 117, 118.

Additional details are required, and the applicant must demonstrate the site's sustainability, accessibility and highway safety credentials:

- Submit a Vision for the site and demonstrate the site will be sustainable as per NPPF Chapter 9 Promoting Sustainable Transport.
- Provide further evidence to demonstrate that the site location supports sustainable travel choices for employment, education, and leisure, reducing reliance on private car ownership, as per HCC LTP Policy 1, Policy 2, Policy 4, Policy 5
- Undertake an audit of the suitability of footways, cycleways, and public transport.
- Provide realistic options to achieve promote and achieve a non-car dominant development.
- Conduct a further review of the Local Cycling and Walking Infrastructure Plan, Cycle Infrastructure Design – Local Transport Note 1/20 (2020), and Inclusive Mobility (2021).

- Demonstrate that the proposed site access junction complies with the HCC Place and Movement Design Guide and alignment with LTP4 objectives (i.e., prioritising sustainable travel over car use).
- Conduct further analysis of multi-modal trip generation and mode share and carry out additional analysis of trip distribution and assignment.
- Submit further details on the Travel Plan.

## COMMENTS / ANALYSIS

### **Proposal Description**

The proposal is for the erection of up to 130 dwellings (comprising 52 affordable units) with public open space and other associated works, keeping all matters reserved at this stage except for access.

Access to the site is proposed via the adjacent Coopers Elm by extending the road into the development site.

### **Site Description**

The site is currently greenfield and is located to the east of Pirton village. The site is bound to the west by residential dwellings, to the south by Hambridge Way, to the east and north by undeveloped land.

### **History**

A review of the Council's online record of planning applications has identified the following planning applications of direct relevance to this application:

1. 17/01543/1 - Outline planning application for the erection of up to 99 dwellings with public open space, landscaping and sustainable drainage system (SuDS) and vehicular access point from Holwell Road; All matters reserved except for means of access. The application was refused on 18 September 2017, following which an appeal was made and was rejected on 18 January 2019 on grounds of site accessibility along with other non-transport related matters raised.
2. 17/02563/1 - Outline planning application for the erection of up to 85 dwellings with public open space, landscaping and sustainable drainage system (SuDS) and vehicular access point from Holwell Road; All matters reserved except for means of access. The application was refused on 15 December 2017.

The reasons for refusal for both the applications above were similar, with the key issue noted as the need for residents to rely more on private vehicles to use services/ facilities located outside of the immediate area.

### **Policy Review**

The Transport Assessment submitted in support of this outline planning application has referenced the following policy documents:

- The National Planning Policy Framework (NPPF) (December 2024)
- Hertfordshire Local Transport Plan (LTP4) (2018 – 2031)
- North Hertfordshire Local Plan 2011 - 2031 (adopted November 2022)
- Pirton Neighbourhood Development Plan 2011 - 2031 (adopted April 2018)

Whilst the applicant has referred to the latest version of the NPPF, it must be noted that the TA fails to focus on a vision-led approach (NPPF Chapter 9). Review of the Local Cycling and Walking Infrastructure Plan (2023), Cycle Infrastructure Design – Local Transport Note 1/20 (2020) and Inclusive Mobility (2021) is required, to ensure adequate inclusive accessibility to local facilities

including public transport, shops and schools by active travel modes, in accordance with the Government's Gear Change policy agenda and the requirements of the Disability Discrimination Act (2005). Any improvement works to the highway must also be designed in accordance with the HCC Place and Movement Design Guide. Please note, whilst this review is requested as a bare minimum for all major planning applications, there remains concerns that the site remains in an unsustainable location.

### **Sustainability and Accessibility**

Pirton is a small village with limited local facilities and amenities available, and therefore, the residents will need to travel outside of the village for daily commuting trips and visits to the retail stores available in Hitchin. Considering the location of the site and the existing walking, cycling and public transport options, it is likely that the residents will need to rely on private vehicles to make most of their trips.

The Highway Authority notes that the TA does not align with the vision-led approach set out in the National Planning Policy Framework (NPPF). The revised NPPF (2024) emphasises a vision-led approach to development, as outlined in paragraphs 109, 115, 117, and 118, to ensure sustainability.

To demonstrate compliance with the NPPF, the applicant should provide clear evidence of the site's sustainability by aligning with the requirements set by Active Travel England (ATE). This should include a robust assessment of active travel provision, accessibility to key destinations, and measures to promote sustainable transport modes.

The Highway Authority recommends that the Applicant demonstrates the sustainability of the site by assessing its accessibility to local amenities and public transport via active travel modes, including walking and cycling. This should include an evaluation of existing and proposed pedestrian and cycling infrastructure, ensuring safe, direct, and convenient routes that align with national and local active travel policies.

The ATE assessment toolkit outlines key criteria that developers must meet to ensure that new developments promote walking, cycling, and public transport use.

The ATE toolkit recommends demonstrating the site's sustainability by:

- Accurately forecasting active travel trips and assessing the accessibility of walking and cycling routes.
- Safe and direct pedestrian connections to local amenities within 800m should be ensured, along with well-designed cycling links to key destinations, including employment hubs and public transport.
- The site should be located within 400m of a high-frequency bus stop to support multimodal connectivity.
- Proposals should enhance off-site active travel and public transport infrastructure, prioritize pedestrian and cycling movement within the site, and create safe, inclusive public spaces.
- Adequate cycle parking and end-of-trip facilities must be provided.
- A robust travel plan with clear mode-share targets, monitoring, and remedial measures should be in place to encourage sustainable travel choices.

These requirements align with Local Transport Note 1/20 (LTN 1/20) and ensure that new developments contribute to a sustainable, low-carbon transport future.

More information on Active Travel England (ATE) assessment toolkit can be found at Active Travel England: planning application assessment toolkit - GOV.UK

As a minimum, the Highway Authority recommends the Applicant to undertake routes audits as mentioned below.

- Audit of the suitability of the footways and crossings on routes to local facilities on existing streets and design review of the proposed footways and crossings within the proposed development on new streets in accordance with Inclusive Mobility (2021) guidance. Assess likely proposed development trips and propose any necessary mitigation or design changes prior to planning determination. It is recommended to undertake route audit using Active Travel England's (ATE) Route Selection Tool (RST) and improvement be suggested accordingly.
- Audit of the suitability of the existing cycle routes to local schools and facilities on existing streets and design review of the proposed cycle routes within the proposed development on new streets in accordance with Cycle Infrastructure Design – Local Transport Note 1/20 (2020) guidance and the emerging LCWIP. Assess likely proposed development trips and propose any necessary mitigation or design changes prior to planning determination. It is recommended to undertake route audit using ATE RST and improvement be suggested accordingly.

#### Walking and cycling

Footways are located on either side of the Drovers Way all the way from the Coopers Elm to the Holwell Road/ Drovers Way priority junction, after which they terminate. Section 2.6 of the TA notes that an emergency access is located at the southern end of Drovers Way which joins Hambridge Way – a bridleway. An extract of the street imagery of the bridleway is shown below. The applicant should review whether a motorised vehicle is permitted along a Bridleway in order to serve the emergency access.



The other preferred route for accessing the amenities in the village is via the Holwell Road – Royal Oak Lane; however, this route does not have continuous footpaths and the pedestrians/ cyclists are required to use the vehicular carriageway (please see below). Further to this, the lack of street lighting may result in the future residents not to use these routes.



A primary school is located at a walking distance of approximately 1km to the west of the site, however this is not within the preferred walking distance of 800m as set out in the North Hertfordshire Local Plan 2011-2031. Additionally, Table 2.1 of the TA identifies the different local facilities such as Village Hall, churches and recreational spaces that are accessible via walk or cycle from the proposed development. The table indicates that the majority of these facilities, which are available in the village limits, are not in the vicinity of desirable walking distance.

While existing walking routes/ connections from the site to the different nearby local amenities have been detailed, the TA does not include an audit to check whether the suitability of the footways and crossings on these routes is in accordance with Inclusive Mobility (2021) guidance.

The TA identifies that there are no standard cycle lanes or shared use facilities in the vicinity of the site, and notes that “The surrounding roads are considered suitable for cyclists given the number and speed of vehicles in the vicinity are relatively low and the width of the road allow cars to pass”. However, no evidence of this has been provided to justify that the existing low-traffic roads are suitable for cyclists.

Policy T1 of the North Hertfordshire Local Plan 2011 – 2031 states that – for major developments, applicants demonstrate how safe, direct and convenient routes for pedestrians and cyclists will be provided. The lack of walking and cycling accessibility to the site goes against the Policy 1 (Transport User Hierarchy), Policy 2 (Influencing land use planning) and Policy 5 (development Management) contained within Hertfordshire LTP 4.

It is also recommended that the applicant discuss any improvement proposals involving Public Right of Way (PROW) with the HCC PROW officer.

### **Public Transport**

The nearest train station at Hitchin is located approximately 6km southeast of the proposed development. A bus stop is located approximately 300m from the site to the northwest – Royal Oak Lane operating service 89. However, there is no indication of the bus stop on the Holwell Road and no associated facilities (flag and post arrangement/ waiting area, etc.) are available. Lack of footpaths combined with the unavailability of crossing points may be a deterrent to the future residents of the development to prefer public transport.

Table 3.1 of the TA provides the frequency of the bus service operating along the Hitchin – Henlow Camp route. The bus frequency information provided in Table 3.1 matches the operator information,

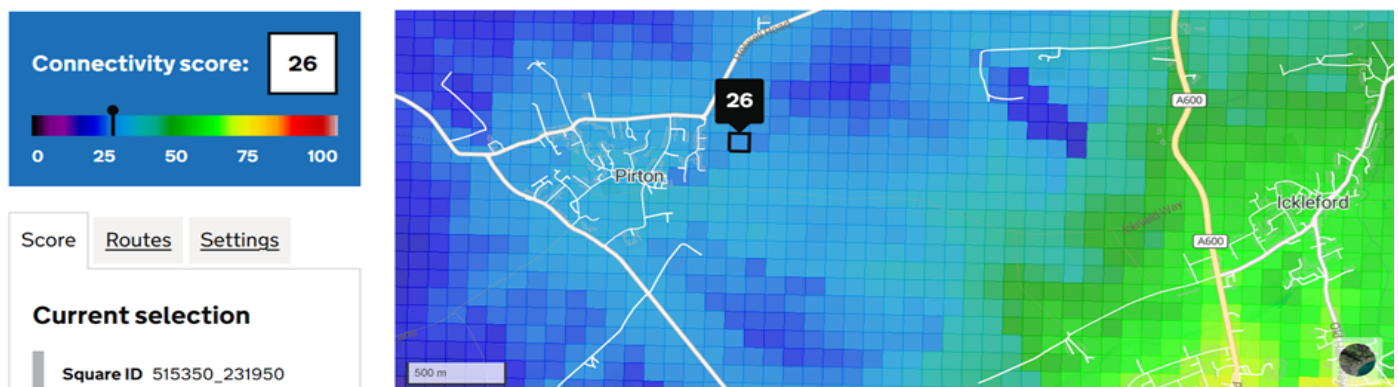
and indicates that the morning frequencies from Royal Oak Lane bus stop to Hitchin railway station are limited to one hour services at 6:55, 7:55 and 9:19 hours only.

The Bus Service Improvement Plan for Hertfordshire County Council (2021) identifies improvement plans and opportunities to promote public transport, which need to be identified and pursued within the TA.

### **DfT Connectivity Tool**

The Department for Transport has released the first nationally agreed measure for determining connectivity levels of a location. The Connectivity Tool is intended to enable developments to be placed in the most sustainable locations and help plan the necessary infrastructure to support them. The tool combines transport and land use data to generate a connectivity score that measures people's ability to get where they want to go, using walking, cycling and public transport to reach jobs, shops, schools, healthcare and other essential services. This index measure provides relative connectivity and takes account of different destinations, modes of travel and travel time.

The location of the site is reported by the DfT to achieve a connectivity score of 26 out of 100.



This indicates a below average metric and highlights the need for additional infrastructure to make the area more connected, such as providing additional facilities and improving active travel and public transport connections.

It is concluded that further information is required to demonstrate that, in terms of sustainability, the location of the site is conducive to providing future residents with a realistic choice to private car ownership for day-to-day trips associated with employment, education and leisure purposes. This is particularly to emphasise that the development should be accessible to users of all classes irrespective of the gender, visual impairment or mobility.

NPPF paragraph 109 (e) requires opportunities to promote walking, cycling and public transport use be identified and pursued.

### **Road Safety**

A personal injury collision analysis has been undertaken using data obtained from the Hertfordshire County Council for the five-year period covering from 2019 to 2024, which a single collision marked under slight severity in 2020. As such, no further assessment is required from the Applicant.

Additionally, we note that a Stage 1 Road Safety Audit (RSA) has been undertaken for the proposed access arrangement, which indicates no major traffic related concerns.

## **Access**

It is proposed that the pedestrian/cyclist/vehicular access to the development will be served via Coopers Elm by an extension to the existing carriageway into the site, which remains the same as that proposed for the earlier planning application.

The proposed carriageway will have a width of 5.5m and the footpath extended from the existing Coopers Elm road via a 2m-wide footway on either side of the carriageway (Ref. Drawing – Proposed Access Arrangement I000653 – 01 - Rev A, dated 6 February 2025). A crossing point is also proposed at the start of the site access from where extension of the existing carriageway is proposed.

The TA is supported by swept path analysis and visibility splay analysis drawings. While a visibility splay diagram is provided, no measurements are available in the drawing (Ref. Drawing – Proposed Access Arrangement I000653 – 01 - Rev A, dated 6 February 2025).

Vehicle tracking for the site has been undertaken for a 12.2 x 2.5m long refuse vehicle as shown on drawing I000653 – 02, dated 11 June 2025. This shows a refuse vehicle turning from either direction into the site and safely exiting the site in both directions.

The Highway Authority would require the Applicant to submit a detailed annotated site access arrangement plan confirming alignment with HCC Place and Movement Design guidance.

## **Comments on Stage 1 Road Safety Audit**

Any works within the highway boundary (including alterations to the footway) will need to be secured and approved via a s278 Agreement with HCC.

## **Internal Layout**

As the application is in the outline stage, the internal site layout will be designed in detail during the reserved matters application. We acknowledge that the Applicant has noted that consideration will be given to HCC's Place and Movement Design Guidance, and MfS guidance. The guidance recommends a minimum carriageway width of 5.5m and a minimum forward visibility of 33m. It also provides standards for, but is not limited to, junction spacing, footway, and cycleway widths. It is recommended that compliance with the guidance be demonstrated.

The development proposals must include adequate footways to an acceptable standard dropped kerbs and tactile paving to enable safe and suitable access for pedestrians and mobility impaired users, in line with HCC Local Transport Plan Policy 1 and NPPF para 117 (a,b,c).

## **Parking**

It is noted within the TA and other supporting documents that the development will provide car and cycle parking in line with policy requirements. We understand that this would be considered in detail during the reserved matters stage, however an indication of the spaces would be welcomed at this stage.

We recommend that the Applicant gives due consideration for provision of electric vehicle charging points, secured and covered cycle parking bays, blue badge bays, etc. to enhance the sustainable modes of transport and to ensure mobility of users of all classes. The Highway Authority would highlight that the cycle parking storage should be in line with the LTN1/20 guidance.

### **Servicing, Refuse and Emergency Access**

The Applicant has submitted swept path analysis for a 12.2 m long refuse vehicle, which indicates that the vehicle can satisfactorily enter and exit the site from both directions.

Section 4.13 of the TA states that “Adequate storage for refuse and recycling will be provided in accessible locations and sufficient space will be provided in each collection location/area for refuse vehicles to manoeuvre so that they can enter and exit site in forward gear”. We acknowledge this and look forward to receiving detailed information in due course.

### **Trip Generation**

The vehicular trips anticipated from the development have been calculated using a nearby proxy residential site. ATC surveys were undertaken at the site access off the adjacent Cala Homes scheme (82 units) on 8 May 2025, and two-way trip rates calculated from the traffic flow profiles for the standard AM and PM peak hours.

The total vehicle trips anticipated by the Applicant for the development proposal are provided below:

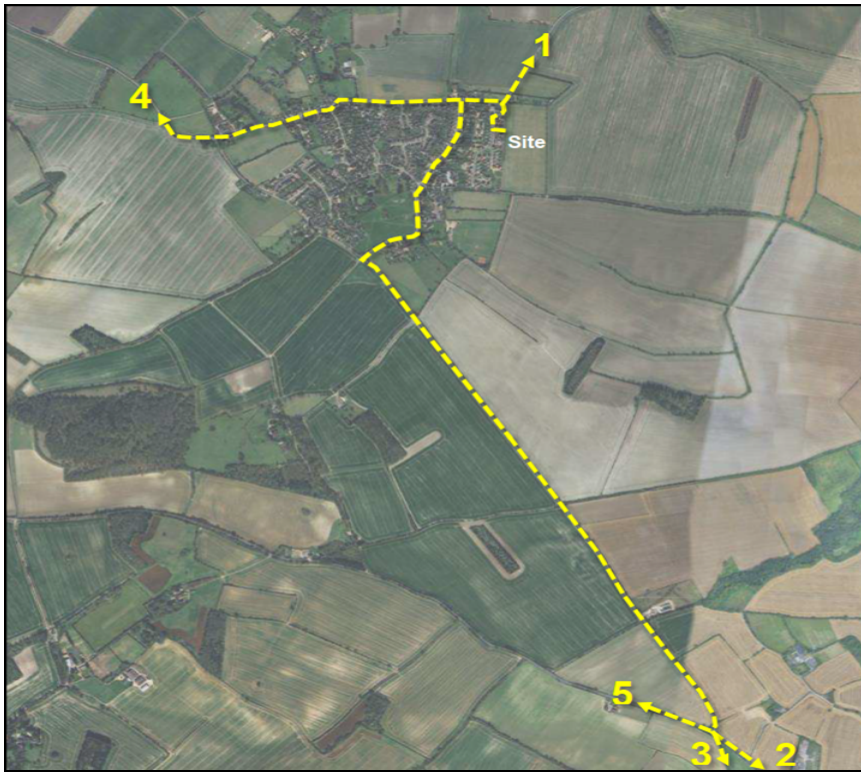
|                 | <b>AM Peak (08:00 to 09:00)</b> |                   |                | <b>PM Peak (17:00 to 18:00)</b> |                   |                |
|-----------------|---------------------------------|-------------------|----------------|---------------------------------|-------------------|----------------|
|                 | <b>Arrivals</b>                 | <b>Departures</b> | <b>Two-way</b> | <b>Arrivals</b>                 | <b>Departures</b> | <b>Two-way</b> |
| Trip rate       | 0.176                           | 0.402             | 0.578          | 0.344                           | 0.161             | 0.505          |
| Trip generation | 23                              | 52                | 75             | 45                              | 21                | 66             |

Based on our checks, overall, we consider the vehicle trip rates presented in Table 5.2 of the TA as acceptable (also provided above). However, there is no mention of the vision-led approach and the likely shift. This is necessary to enable the further assessment of the likely development trips and propose any necessary mitigation or design changes to support local sustainable walking, wheeling, cycling and public transport trips.

### **Trip Distribution and Assignment**

Section 5.7 of the TA states that “Origin and Destination’ data has been obtained from the 2011 Census to distribute the proposed development traffic to the wider highway network”; however, no indication of the MSOA selected is available. It is our understanding that this relates to the North Hertfordshire 014 MSOA, however we require clarity from the Applicant on this.

The trips were assigned to different routes via Google map routeing exercise, which has identified the following 5 routes for commuting purposes. While this provides an indication of distribution for the commuting trip purpose, no information is currently available on the other types of trips, such as education, social and recreation, etc.



While the current methodology of assigning commuting trips to the local highway network helps assess the case of work trips, it fails to account for other trip purposes as it provides no assessment of likely walking, cycling or bus trips and trip purpose from the proposed development, which is needed to assess any necessary mitigation or design changes to the footways/crossings, cycle routes and bus services.

Additionally, we recommend that the Applicant provides a list of key destinations assigned to each route to understand how the trips have been assigned.

### **Highway Impact**

The applicant has undertaken detailed capacity assessments at the following junctions using Junctions software package.

1. Site Access Holwell Road / Drovers Way 'Bennett' Junction
2. Holwell Road / Royal Oak Lane / West Lane
3. Royal Oak Lane / Hambridge Way / High Street
4. Hitchin Road / Walnut Tree Road
5. B655 Hexton Road / Hitchin Road / Carters Lane

Baseline data: The Applicant commissioned Manual Traffic Count (MTC) at the above listed junctions covering morning and evening peaks respectively (AM - 7:00 to 10:00 hours, and PM - 16:00 to 19:00 hours). The surveys were undertaken on Thursday – 8 May 2025, and we consider that the survey day is neutral as it does not fall within bank or school holidays. However, we recommend that the applicant provides further information on the data suitability checks carried out to ensure that the data collected is robust and is free of any daily/ seasonal flow variations. No Automatic Traffic Counts (ATC) seem to have been undertaken, other than the ones used in support of the trip rates estimation. The Applicant is also required to clarify if MCC surveys are supported by queue surveys as well.

Traffic growth: The baseline traffic collected in 2025 have been growth to 2030 using TEMPro and we consider the growth rates presented in section 5.16 of the TA as acceptable.

Modelling assessment: Capacity assessments have been carried out for the following scenarios:

1. 2025 Existing Scenario
2. 2030 Base Scenario
3. 2030 Base + Development Scenario

Considering that there are outstanding matters as noted above regarding the trip generation and required Vision-led approach, HCC is currently not in a position to comment on the model results and development impacts.

### **Travel Plan**

Having reviewed the Framework Residential Travel Plan (TP), the Highway Authority have the require the following updates:

- Confirmation that a secondary TPC contact will be provided to HCC prior to occupation.
- Estimated time commitment for the TPC role.
- Traffic data collection commitment as per HCC Travel Plan Guidance.
- Confirmation the travel plan will be reviewed annually, with a report submitted to HCC within three months of data collection.
- Confirmation that residential travel packs will be provided at a rate of £50 per flat and £100 per house and may include bus vouchers or vouchers supporting active travel.
- Confirmation baselines modal split and associated targets will be updated and reviewed following the completion of baseline survey data.
- Confirmation the the TPC will attend a meeting with HCC Travel Plan team to introduce and use the Modeshift Starts travel plan accreditation platform.

The applicant must note a full travel plan will be required for the site to be in place from first occupation until 5 years post occupation. A £1,200 per annum Evaluation and Support Fee is required for this period.

### **Planning Obligations**

Once the above matters are resolved the Highway Authority will be in a position to outline any obligations.

### **Construction Traffic Management Plan**

HCC would require a full Construction Traffic Management Plan to ensure construction vehicles would not have a detrimental impact on the highway network. A Planning condition would be required to provide adequate parking for construction vehicles on-site to prevent on-street conflict and impacts to the highway safety.

### **Conclusion**

The Highway Authority wishes to raise an objection for reasons set out at the front of this response.

### **Signed**

Samuel Tearle  
11 August 2025