

Church Wood, Three Houses Lane, Codicote

NHDC Application No. 24/02343/FP



Introduction

1. DTA have been appointed by a resident group local to the above site to review the transport implications of the above proposal. Following that review, this Note represents an **OBJECTION** to those proposals.
2. It is noted that HCC have already objected to the proposal (letter dated 17/1/25) ostensibly on the grounds of incorrect data, confusing data and insufficient information being provided. DTA agree with the content of the HCC response.

Application Material

3. The application description refers to a change of use from agricultural to Class B8; extensions to existing barns; and installation of hardstanding for outside storage and parking.
4. The site plan does not provide sufficient information regarding the scale of extension or external storage. The application should comprise a schedule of gross external floor areas to demonstrate the areas of consented agricultural buildings, the area of consented residential use, the areas of additional buildings which have been constructed at the site (without planning permission) and the areas of the ancillary buildings which have been erected at the site (without planning permission).
5. The application form refers to an existing number of parking spaces (5) and a total future number of spaces (14). These are not shown on the site plan. The existing floor area is given as 945sqm with the proposal to increase to 1,069sqm. Measurements from the scaled plans submitted suggest an existing floor area of 786sqm, with an increase to 1233sqm, plus a further 102sqm 'temporary' building. Confusingly, the form states that industrial or commercial activities / processes do not arise from the B8 proposal.
6. The Transport Statement (TS) prepared in support of the application:
 - States that the site currently comprises agricultural barns (which is inaccurate).
 - States that Three Houses Lane carriageway measures c.5m wide (which is incorrect).
 - Does not provide vehicle swept path evidence.
 - Does not illustrate how site vehicles can pass on site or on Three Houses Lane.
 - Fails to show how car parking or servicing is to be accommodated on site.
 - Recognises that traffic generation for agricultural barns would be low.
 - States that traffic generation from agricultural barns would be dominated by HGVs with low acceleration and speed which it confirms would lead to high levels of disruption on the local highway network. It is not clear why the



agricultural use would need to be supported by multiple HGV operations rather than tractors nor why such HGVs would be slow moving.

- Provides an inappropriate forecast of traffic levels given the incorrect office reference on site.
- References only an ancillary storage function despite the B8 proposal and not the B2 use-class industrial manufacturing operations evident currently on the site.
- Does not define the extent of external storage areas.
- States that the reduction in large vehicles between consented agricultural and proposed B8 use would lead to a noticeable benefit on local highway conditions.

Site Visit / Local Knowledge

7. DTA have been provided with a series of camera / video images of the current operation at the site. This has been supplemented by a DTA site visit to the adjoining public highway (Three Houses Lane) between B656 to the east and Codicote Road to the west with video footage taken.
8. Contrary to the statement in application TS, Three Houses Lane (which is approximately 2.4km long) has no sections with 5m width and acts as a single lane track throughout. A detailed set of measurements were taken along 130m of Three Houses Lane to the east of the site access and 80m to the west. Apart from two very localised “wider” sections of 4.1m - 4.3m, the carriageway on the lane measures 3.5m – 3.7m across the 210m section with very limited informal passing places. It is clear from driving along the whole road, that this is the typical width throughout. A maximum legal width is around 2.5m. The minimum carriageway width as defined by Manual for Streets for a car to pass an HGV is 4.8m. There is no section along the length of Three Houses Lane where either the carriageway or a passing bay affords the necessary width to pass.
9. It is evident from photographic evidence and the site visit that the site is not currently being used for agricultural purposes. A widespread external area shows stored window frames, and there is clear evidence of these having been assembled and hence currently operating under B2 industrial use, so neither the consented, nor proposed, nor indeed TS referred B8 land uses are being undertaken at present.



Appraisal

10. The application transport material provided is entirely unsuitable to support the application. It is however revealing in the applicants TS when in justification of B8 development, they refer to the presence of large vehicles representing high levels of disruption on the local highway network. This is clearly true and agreed.
11. Further the TS refers to the benefit of removing larger vehicles from the consented agricultural use when compared to office use. It is therefore ironic that the current site operation of B2 land use typically generates a significantly higher number of HGV movements than current consent; and that the proposed B8 uses would generate significantly higher numbers of HGVs again.
12. Three Houses Lane is not appropriate to accommodate regular HGV traffic. The photographic images below demonstrate the difficulty with which a max legal articulated vehicle has to access the site. Carriageway widths are inappropriate for the manoeuvres. Trees have been struck and removed. There is evidence already that HGVs delivering and/or dispatching from the site are causing significant damage to the highways verges and to the drainage ditches. The surface of the carriageway to Three Houses Lane is suffering damage, particularly in the vicinity of the site entrance. It is unknown whether vehicles can turn safely within the site.





13. To demonstrate the implausibility of vehicle manoeuvring, DTA have prepared swept path analysis of a max legal articulated vehicle as shown in **DTA Drawing 27019-01**. It is clear that there are no practical or safe means for any opposing vehicle to pass.
14. Sections of Three Houses Lane contain “blind bends”, and extracts from on-site video footage are shown below.





15. The existing B2 operation (and the proposed B8 operation stated within the planning application) both present unsafe accesses.
16. The applicant has not demonstrated whether the visibility splays at the site entrance can be achieved given the presence of large mature trees and telegraph poles. The applicant has already removed one tree located on highways land, in an effort to ease the lorry manoeuvres entering and exiting the site.
17. At either end of Three Houses Lane the junctions onto the wider network comprise substandard visibility from the side road and forward visibility for vehicles turning into Three Houses Lane. In each instance slow moving turning large vehicles represent a hazardous and unsafe situation to other road users. This includes HGVs turning out of Three Houses Lane coming into conflict with through traffic; and HGVs turning into Three Houses Lane showing and causing safety concerns to following traffic due to insufficient forward visibility. Swept path analysis of a max legal articulated vehicle is shown in **DTA Drawing 27019-01-2** to illustrate this. The image below shows a vehicle turning south on to the B656 from the wrong side of the road.



18. Worse than this, the photo below illustrates a vehicle reversing out from Three Houses Lane onto the B656.





19. The site is unsustainably located. There is very limited local population for safe route for employees to walk to the site. Similar travel by bus is implausible due to distant stops (1.7km); occasional services; and no safe route on foot, as there are no footways, no street lighting and the verges to the highway are damaged and flooded, causing pedestrians (and cyclists) to journey on the main carriageway. Journeys by bike would only appeal to experienced cyclists from Stevenage or Welwyn. In practice the likelihood of travelling to work by bike is negligible. There is no direct bus service available to the nearest bus stop from the nearest train service at Knebworth, nor from the main station at Stevenage.
20. The TS suggests that the provision by the applicant of passing laybys on Three Houses Lane could be secured by planning condition. No highways design / technical details for the proposed passing laybys has been submitted. The passing laybys are not included within the red line of the application site boundaries. The construction of any highways compliant passing laybys would involve highways land together with third party land-ownerships. It would be necessary for the applicant to enter into a highways agreement with HCC to secure the delivery of the passing laybys, even if the highways design, highways safety and third-party ownership issues could be overcome. The provision of passing laybys is considered to be unviable.

Policy Context

21. Based on appraisal of the site credentials, the local highway network and the application transport material, it is concluded that the application proposal is contrary to the following national and local policies:
 - National Planning Policy Framework
 - Sustainability (para 10, 115(a) and 117(a))
 - Highway Safety (para 116 and 117(c))
 - Efficient Delivery of Goods (para 117(d))
 - Suitable Site Access (para 115 (b))
 - Highway Impact (para 115 (d))
 - North Herts Local Plan (2011-2031)
 - Policy T1 Assessment of Transport Matters (a) (b) (c) and (d)
 - Policy T2 (b) and (d) Parking
 - Hertfordshire Local Transport Plan 4
 - Policy 1 Reduce Travel Demand and Sustainability
 - Policy 2 Transport User Hierarchy
 - Policy 5 (a) (b) and (f) Development Management
 - Policy 16 (a) Freight and Logistics



Summary

- The application material is inappropriate, inaccurate and incomplete.
- Safe access to the site cannot be achieved due to the inadequate dimensions of the local highway network. The applicant is unable to deliver any improvements to the local highways network.
- It is not demonstrated that vehicles can turn safely within the site.
- The site is unsustainably located.
- The existing operation seemingly contrary to the existing consent is informative in demonstrating the unsafe nature of access.
- The application is contrary to the NPPF, NHDC Local Plan and HCC LTP4.
- The application states that there will be a negligible increase in trip generation and a reduction in HGV movements and a benefit to the local highways network, whereas there will be a significant increase in HGV movements to and from site (as already evidenced by the current operations active on the site).
- The application states that the proposals are not expected to cause a perceptible negative impact to the safe and efficient functioning of the local highway, whereas the proposals will have a negative impact on highways safety, on the efficient operation of the local highway network, to the detriment of the highways construction and maintenance and to public safety.
- On these grounds, and on behalf of the local residents this represents an **OBJECTION**. The application should be refused on highways and transport.

Drawings



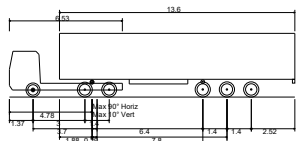
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REV	DESCRIPTION	DRAWN	INITIALS	DATE



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JOB TITLE		CLIENT	
Church Wood, Three Houses Lane		Bourne Wood Partnership	
DRAWING TITLE			
Existing Site Access Tracking Plan			
SCALE	DRAWN BY	DATE	DRAWING No
1/500@A3	BP	17-01-25	27019-01
			REVISION



Max Legal Length (UK) Articulated Vehicle (16.5m)
Overall Length 13.6m
Overall Width 2.550m
Overall Body Height 3.681m
Min Body Ground Clearance 0.411m
Max Track Width 2.500m
Lock to lock time 6.00s
Kerb to Kerb Turning Radius 6.530m



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JOB TITLE Church Wood, Three Houses Lane			CLIENT Bourne Wood Partnership	
DRAWING TITLE Existing Three Houses Lane – B656 Access Tracking				
SCALE 1/500@A3	DRAWN BY BP	DATE 17-01-25	DRAWING No 27019-01-2	REVISION



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