



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

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To: North Hertfordshire Council (FAO Melissa Tyler)
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CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 25/02260/FP

Location: Northway Filling Station, Great North Road, Hinxworth, Baldock, Hertfordshire, SG7 5EX

Proposal: Full Planning Permission: Temporary consent allowing for the erection of a detached food-to-go building (Greggs Pod) and other associated minor site alterations including the formation of vehicle parking for a period of two years (development already commenced)

National Highways Ref: NH/25/13381

Referring to the consultation on a planning application dated 20 October 2025 referenced above, in the vicinity of the A1 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is as follows:

- ~~a) offer no objection (see reasons at Annex A);~~
- b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);
- ~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningEE@nationalhighways.co.uk.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature: 	Date: 5 May 2026		
<table style="width: 100%; border-collapse: collapse;"><tr><td style="width: 50%; vertical-align: top;">Name: Matt Lewis</td><td style="width: 50%; vertical-align: top;">Position: Spatial Planner</td></tr></table> National Highways Woodlands, Manton Lane, Bedford, MK41 7LW PlanningEE@nationalhighways.co.uk		Name: Matt Lewis	Position: Spatial Planner
Name: Matt Lewis	Position: Spatial Planner		

¹ Where relevant, further information will be provided within Annex A.

Annex A **National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Whilst the revised internal layout creates an opportunity for customers to access both the fuelling station and the temporary pod, the limited land available means that aspects of the design may give rise to vehicle interactions with the potential to affect the safety of users in proximity to, and entering, the southbound on-slip.

Accordingly, National Highways requests that the applicant provides a GG104 Safety Risk Assessment, with particular emphasis on the behavioural changes associated with vehicle movements around the forecourt. While National Highways continues to support the fundamental principles of the proposal, it is essential that we are satisfied that internal site interactions will not adversely impact the Strategic Road Network or vehicles waiting to join the on-slip.

The key areas requiring further assessment include:

- the interaction between HGVs exiting the refuelling area and cars turning left behind the fuelling station;
- swept paths for HGV movements on site, including use of the suite of fuel pumps;
- vehicle stacking capacity;
- the interface with the on-slip; and
- the behavioural changes introduced by the revised layout.

Recommended Conditions

National Highways would recommend that conditions should be attached to any planning permission that may be granted.

1. Prior to occupation/ use of the development, a GG104 Safety Risk Assessment shall be submitted to, and approved by, the Local Planning Authority (in consultation with National Highways). Any outcomes thereafter shall be mitigated and agreed by the Local Planning Authority (in consultation with National Highways).

Reason: to ensure the safety of users of the proposed development and those entering the strategic road network.

Thank you again for consulting with National Highways and please continue to consult on other planning applications via our inbox PlanningEE@nationalhighways.co.uk.

Informative

In accordance with DfT Circular 01/2022, paragraph 59 states no-third party connections are permitted into National Highways drainage assets:

“59. To ensure the integrity of the highway drainage systems, no new connections into those systems from third party development and proposed drainage schemes will be accepted. Where there is already an existing informal or formal connection into the highway drainage system from a proposed development site, the right for a connection may be allowed to continue provided that the flow, rate and quality of the discharge into the highway drainage system remains unaltered or results in a betterment. The company may require a drainage management and maintenance agreement to be entered into to secure this requirement in perpetuity.”

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.