

By email

29th October 2025



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To whom it may concern,

Response to Highway Comments – Lilley Hoo Farm, Lilley Hoo Lane

This Highways Response Letter has been prepared following receipt of Hertfordshire County Council's (HCC's) highways consultation responses regarding the proposed change of use at Lilley Hoo Farm into light industrial (E(g)iii) or warehousing (B8) land uses, as part of application references NH/26579/2025 and NH/26578/2025 respectively.

This response specifically refers to the below comment:

"The applicant has submitted drawing Ref-(SK01), which illustrates two passing bays designed for HGVs. The Highway Authority acknowledges the effort made to incorporate these bays, facilitating vehicle movement along the narrow carriageway.

However, visibility becomes an issue especially north of the underpass. How will vehicles observe an oncoming vehicle which has gone through the 90-degree right turn, followed by a 90-degree left turn."

The full HCC Highways response is contained at **Appendix A**.

As outlined within the Transport Technical Note prepared by EAS dated July 2025, it was concluded that the proposed uses would generate an imperceptible increase in traffic compared with the existing agricultural baseline, with a forecast of one vehicle movement in the AM peak hour and one movement in the PM peak hour.

Trip Generation and Passing Points

The TRICS assessment presented within the initial report outlined that a single vehicle movement would be expected during each peak hour. Across the day, a maximum of one vehicle movement is expected in any given hour.

For two vehicles to require passing opportunities, both would have to meet within a short time window.

A peak-hour average of one movement per hour indicates a frequency of approximately one trip every 60 minutes.

For two opposing vehicles to meet simultaneously, an additional trip would need to occur compared the expected baseline, and this would have to take place within the short (circa 1–2 minutes) timeframe it takes to navigate the aforementioned section of Lilley Hoo Lane.

The probability of this occurring, even before considering directional split or vehicle type, is considered to be low.

This also applies to larger vehicles, including OGVs (ordinary goods vehicles) or HGVs (heavy goods vehicle). The TRICS datasheets indicate an expected trip generation of less than one OGV movement per

hour across all surveyed hours (05:00–21:00). Consequently, in any given hour, the likelihood of a single HGV movement is already low, and the likelihood of two HGVs travelling in opposite directions and meeting at the same point is considered to be even lower.

On this basis, the two proposed passing places, as illustrated on Drawing Ref. SK01 were considered appropriate and proportionate to the expected volume and profile of vehicle movements. For reference, SK01 is contained at **Appendix B** of this report.

Additional Passing Points

As a result of the comments received from HCC Highways, A third passing point is now proposed, in addition to the two passing points initially outlined within the Transport Technical Note dated July 2025. This third passing point will be located between the two bends referenced in the Highway Officer's comments to accommodate for a scenario in which a HGV meets an oncoming vehicle within this section of carriageway.

The third passing point is demonstrated in SK02 contained at **Appendix C** of this report. This has been demonstrated to accommodate a scenario in which a large articulated vehicle passes an incoming medium sized delivery vehicle.

It should be reiterated that the likelihood of two vehicles of any size meeting at this point is very low, and as such the likelihood of two OGV/HGVs passing simultaneously at this point is exceptionally low. As such, it is considered that the proposed third passing point should be appropriate in the context of the proposed development and expected trip generation.

The proposed passing point falls entirely within the public highway boundary, as per the mapping contained at **Appendix D**.

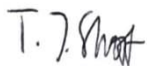
Conclusion

The TRICS assessment outlines that the development would not be expected to generate more than one vehicle movement per hour, including all vehicle types. The likelihood of any two vehicles, particularly HGVs, requiring the ability to pass simultaneously is expected to be low.

Regardless, a third passing point has been proposed at the area highlighted within the HCC Highways response.

On this basis, it is considered that the proposals would not give rise to any unacceptable impact on highway safety or capacity.

Yours Sincerely



Tom Short

Transport Engineer / Planner, for and behalf of EAS Transport Planning Ltd

Appendix: A – HCC Highway Comments



Mark Youngman
Development Management Group Manager
Hertfordshire County Council
Postal Point CHN115
Farnham House
Six Hills Way
Stevenage
SG1 2ST

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: 25/02333/PNR
HCC ref: NH/26578/2025
HCC received: 23 September 2025
Area manager: Manjinder Sehmi
Case officer: Paul Marshall

Location

Lilley Hoo Farm, Lilleyhoo Lane, Lilley, Luton, LU2 8NQ

Application type

Prior Approval

Proposal

Prior Approval Class R Agric to Flex Use : Change of use of an agricultural building to a flexible use within Class B8 (Storage or Distribution).

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:

There is insufficient information supplied with this application to enable the Highway Authority to reach a recommendation. In the absence of the necessary information, the Highway Authority recommends refusal due to doubt over possible implications for highway safety and convenience. Please see reason for refusal below:

Visibility of vehicles and passing bays

The proposals are for Prior Approval Class R Agric to Flex Use: Change of use of an agricultural building to a flexible use within Class E(g)iii (Light industrial).

PREVIOUS HIGHWAYS COMMENTS

The Highway Authority is concerned about the narrow width of Lilly Hoo Lane and the lack of adequate passing areas for large vehicles like articulated HGVs (up to 16.5 meters in length). This poses a potential safety hazard at the junction with Holly Bush Lane. If an HGV turns into Lilly Hoo Lane while another vehicle is exiting, it might have to reverse onto Holly Bush Lane or become stationary to let the other vehicle pass, creating a safety risk. The applicant needs to demonstrate how they will address this issue.

COMMENTS

The applicant has submitted drawing Ref-(SK01), which illustrates two passing bays designed for HGVs. The Highway Authority acknowledges the effort made to incorporate these bays, facilitating vehicle movement along the narrow carriageway.

However, visibility becomes an issue especially north of the underpass. How will vehicles observe an oncoming vehicle which has gone through the 90-degree right turn, followed by a 90-degree left turn.

CONCLUSION

The Highway Authority agrees in principle with the proposals. However, the application cannot be approved until adequate visibility has been demonstrated and an appropriate solution has been provided.

Signed

Paul Marshall

7 October 2025



Mark Youngman
Development Management Group Manager
Hertfordshire County Council
Postal Point CHN115
Farnham House
Six Hills Way
Stevenage
SG1 2ST

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: 25/02334/PNR
HCC ref: NH/26579/2025
HCC received: 23 September 2025
Area manager: Manjinder Sehmi
Case officer: Paul Marshall

Location

Lilley Hoo Farm, Lilleyhoo Lane, Lilley, Luton, LU2 8NQ

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Signed

Paul Marshall

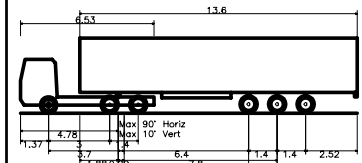
7 October 2025

Appendix: B – Passing Points (as per Rev A Report)

LILLEY HOO LANE
1:1,000 SCALE



NORTHERN PASSING POINT
1:500 SCALE



Max Legal Length (UK) Articulated Vehicle (16.5m)
Overall Length 16.500m
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

SOUTHERN PASSING POINT
1:500 SCALE



REV	DATE	BY	DESCRIPTION	CHK	APD
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DRAWING STATUS:

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1st Floor Millers House, Roydon Road,
Stanstead Abbots, Hertfordshire, SG12 8HN
Tel: 01920 871777

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CLIENT:

ARCHITECT:

PROJECT:

LILLEY HOO FARM,
NORTH HERTFORDSHIRE

TITLE:

PROPOSED PASSING POINTS
AND SWEEP PATH ANALYSIS

SCALE: A2: SEE VIEWPORT	DESIGN-DRAWN: TS	DATE: 08/07/2025
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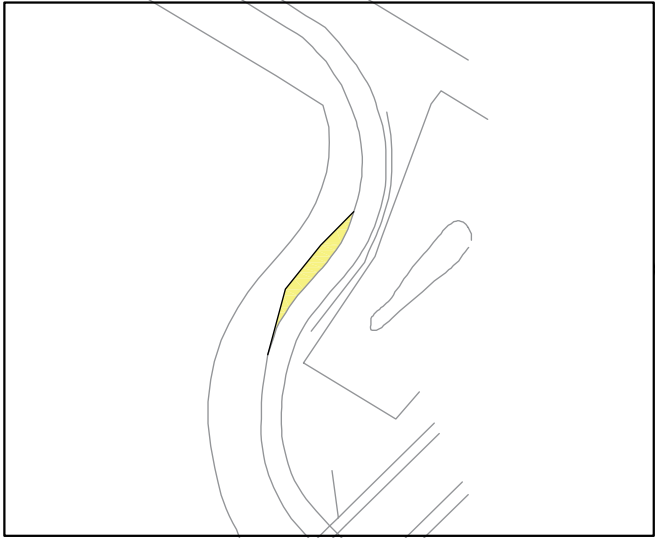
PROJECT No: 5973	DRAWING No: SK01
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Appendix: C – Additional Passing Point

LILLEY HOO LANE
1:1,000 SCALE

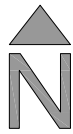


FOR DETAILS SEE SK01

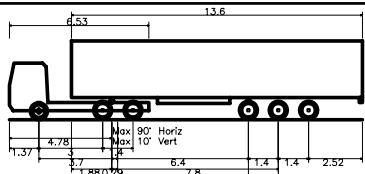
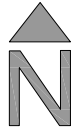


FOR DETAILS SEE SK01

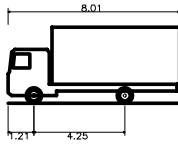
SWEPT PATH ANALYSIS
1:500 SCALE



SWEPT PATH ANALYSIS
1:500 SCALE



Max Legal Length (UK) Articulated Vehicle (16.5m)
Overall Length 16.500m
Overall Width 2.550m
Overall Body Height 3.681m
Min Body Ground Clearance 0.411m
Max Track Width 2.500m
Lock to lock time 8.00s
Kerb to Kerb Turning Radius 6.550m



7.5t Box Van
Overall Length 8.010m
Overall Width 2.100m
Overall Body Height 2.556m
Min Body Ground Clearance 0.351m
Track Width 2.064m
Lock to lock time 4.00s
Kerb to Kerb Turning Radius 7.400m

REV	DATE	BY	DESCRIPTION	CHK	APD
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DRAWING STATUS:

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CLIENT:

ARCHITECT:

PROJECT:

LILLEY HOO FARM,
NORTH HERTFORDSHIRE

TITLE:

ADDITIONAL PASSING POINT
AND SWEPT PATH ANALYSIS

SCALE: A2: SEE VIEWPORT	DESIGN-DRAWN: TS	DATE: 28/10/2025
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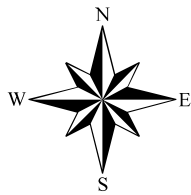
PROJECT No: 5973	DRAWING No: SK02
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Appendix: D – Highway Boundary Mapping

For reference purposes only.
No further copies may be made.
Produced by Highway
Boundaries & Land Charges
Hertfordshire County Council
Date: 26/06/2025



Lilley Hoo Lane
HITCHIN



Scale at A2
1:1,250

The Rights of Way information on this plan is based on information from the Definitive Map of Public Rights of Way. The accuracy of this plan cannot be guaranteed. If in doubt the Definitive Map should be consulted.

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