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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: 26/00705/FP
HCC ref: NH/29440/2026
HCC received: 29 July 2026
Area manager: Manjinder Sehmi
Case officer: Senober Khan

Location

Connor Gardens, Danesbury Park Road, Welwyn, Hertfordshire, AL6 9SN

Application type

Full Application

Proposal

ADDITIONAL INFORMATION

Full Planning Permission : Change of use of land to residential static caravans/park homes to include footpath extension, parking, improved access points and associated landscaping (including changing the levels of part of the quarry area) and infrastructure

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:

The proposal is considered contrary to Policies TR3 (Locating Development in Sustainable Locations), TR4 (Street Design, Access and Parking), TR6 (Assessing Transport Impacts), DP3(2)(d) (Movement) and CC2 (Mitigation of Climate Change) of the National Planning Policy Framework (August 2026), together with Hertfordshire LTP4 Policies 5 and 6 and the Hertfordshire Place and Movement Planning and Design Guidance. The applicant has failed to demonstrate that safe and suitable access can be achieved for all users or that the development would support sustainable patterns of movement.

Highways comments:

The Highway Authority (HA) has reviewed the applicant's response dated 20 July 2026 in response to the HA consultation response dated 29 June 2026.

Since the HA's original response was issued, the National Planning Policy Framework (NPPF) August 2026 has been published and now forms a material consideration in the determination of planning applications. The national decision-making policies within the NPPF took effect from 17 August 2026 and have therefore been taken into account in this review.

The HA notes that the assessment of whether the proposal is acceptable in principle under Policies S4 or S5 of the NPPF is primarily a matter for the Local Planning Authority (LPA). The HA's comments are therefore confined to transportation, accessibility and highway safety matters.

The HA acknowledges that the proposal comprises 27 residential park home units for occupation by persons aged over 50, and that the submitted Transport Statement identifies a relatively low level of vehicular trip generation associated with the development. The HA's concerns do not principally relate to junction capacity or traffic generation but instead concern the ability of the development to provide safe, suitable and sustainable access for future residents.

Having reviewed the applicant's submission and supporting evidence, the HA remains of the view that the applicant has not demonstrated compliance with the relevant accessibility, connectivity and highway safety requirements of the NPPF (August 2026). Accordingly, the HA's position remains unchanged.

Pedestrian accessibility and connectivity

The applicant places considerable reliance on the absence of recorded Personal Injury Accidents (PIAs) involving pedestrians and argues that existing users already utilise the surrounding network without demonstrable safety concerns. The HA acknowledges these comments.

However, the absence of recorded collisions does not demonstrate that a route is safe, attractive or suitable for regular day-to-day pedestrian use. The relevant planning consideration is whether future residents would have access to safe, convenient and attractive walking routes to local services, facilities and public transport opportunities.

The applicant has not submitted a Pedestrian Route Audit, accessibility assessment, Road Safety Audit (RSA) or any other objective and independent evidence demonstrating that future residents of the proposed 27-unit development would be able to safely and conveniently undertake daily journeys on foot.

The HA welcomes the provision of a frontage footway. However, the proposal does not demonstrate that this infrastructure would form part of a continuous pedestrian network linking the development to key destinations. Whilst sections of pedestrian infrastructure exist within the wider area, the routes available to future residents continue to incorporate sections of highway with limited pedestrian provision and reliance upon shared use with vehicular traffic.

Accordingly, the HA remains unconvinced that the proposal complies with Policy TR4(1)(a) and (b), which require development to prioritise walking and wheeling and provide appropriate connections to neighbouring areas and public transport facilities. The proposal also fails to adequately demonstrate compliance with Policy DP3(2)(d), which seeks development that provides good connections and prioritises sustainable movement.

Accessibility to public transport and sustainable travel

The applicant disputes the significance of walking distances to the nearest bus stops and argues that the HA has applied overly restrictive accessibility benchmarks. The HA accepts that no single walking distance threshold should be applied in isolation.

However, the HA's concerns arise from the overall accessibility characteristics of the site rather than distance alone. These concerns relate to:

- The site's rural location;
- The distance to public transport services;
- The quality and continuity of available pedestrian routes;
- The limited opportunities for travel by sustainable modes; and
- The likely reliance on private vehicle use for the majority of day-to-day journeys.

The applicant has not submitted a revised Transport Statement, accessibility assessment, Travel Plan or sustainable transport strategy demonstrating that future occupiers would have a genuine choice of transport modes.

The HA acknowledges that the development comprises only 27 units and is not expected to generate substantial traffic volumes. However, the low level of trip generation does not overcome the requirement to demonstrate that residents can access facilities and services by modes other than the private car.

Policy TR3(1)(a) requires development to be located where it limits the need to travel, particularly by private car, and offers a genuine choice of transport modes appropriate to the development proposed. The information submitted does not satisfactorily demonstrate compliance with this requirement.

The HA also notes Policy TR3(1)(e), which requires opportunities to improve walking, wheeling, cycling and public transport connectivity in rural areas to be taken where they exist and can be supported by the development. Whilst footway improvements are proposed, insufficient evidence has been provided to demonstrate that these measures would result in safe, convenient and attractive access to key destinations or public transport facilities.

The HA therefore remains of the view that future residents of the proposed 27-unit park home development would be highly reliant on private vehicle use.

Access arrangements

The applicant has provided further justification for the proposed one-way internal arrangement with separate ingress and egress points. These comments are noted.

The HA accepts that the traffic generated by the development is likely to be modest. Nevertheless, no amended access layout, revised junction design or further technical assessment has been submitted which materially alters the concerns identified within the original consultation response.

The HA remains unconvinced that the proposed dual-access arrangement represents the most appropriate design solution and remains concerned that two access points introduce additional points of interaction with the highway network without demonstrating a clear safety benefit.

Visibility and highway safety

The applicant disputes the applicability of DMRB standards and relies upon measured vehicle speeds and Manual for Streets principles. The HA acknowledges those arguments.

However, no revised technical drawings, independently verified visibility assessment, land control information or maintenance proposals have been submitted to demonstrate to the HA's satisfaction that the required visibility splays can be secured and maintained for the lifetime of the development.

The issue for the HA is not the volume of traffic that would be generated by the proposed 27 units. Rather, it is whether safe and suitable access has been satisfactorily demonstrated. On the basis of the information submitted, the HA remains unable to reach that conclusion.

The proposal therefore fails to adequately demonstrate compliance with Policy TR4(1)(c), which requires safe and inclusive movement for all users, and Policy TR6(4), which requires refusal where development would result in an unacceptable impact on highway safety.

Wider highway environment

The applicant refers to existing residential caravan and traveller developments within the locality and argues that similar vehicle movements already occur on the surrounding road network.

Whilst noted, the existence of other development does not demonstrate compliance with current national transport policy nor establish that future residents of the proposed development would have access to safe, accessible and sustainable travel opportunities.

The surrounding highway environment remains predominantly rural in character with constrained sections, limited pedestrian infrastructure and restricted opportunities for travel by sustainable modes. No substantive evidence has been submitted that would alter the HA's previous conclusions in this regard.

Conclusion

The HA acknowledges that the proposal comprises 27 park home units and would generate a relatively low level of vehicular traffic. The HA's objection is not founded upon concerns regarding traffic capacity or severe congestion impacts. Instead, it relates to the failure to demonstrate safe, suitable and sustainable access for future residents.

Having reviewed the applicant's response, the HA considers that the submission primarily challenges the conclusions of the original consultation response but does not provide sufficient new technical evidence to overcome the concerns previously identified.

The HA remains of the view that:

- Safe and suitable pedestrian access to local services and public transport has not been satisfactorily demonstrated.
- The proposal has not demonstrated a genuine choice of transport modes for future residents.
- Future occupiers would remain highly reliant upon private vehicle use.
- Safe and suitable access arrangements have not been satisfactorily demonstrated.
- The proposal has not demonstrated compliance with the sustainable transport objectives of the NPPF (August 2026).

Recommendation

The proposal is considered contrary to Policies TR3 (Locating Development in Sustainable Locations), TR4 (Street Design, Access and Parking), TR6 (Assessing Transport Impacts), DP3(2)(d) (Movement) and CC2 (Mitigation of Climate Change) of the National Planning Policy Framework (August 2026), together with Hertfordshire LTP4 Policies 5 and 6 and the Hertfordshire Place and Movement Planning and Design Guidance. The applicant has failed to demonstrate that safe and suitable access can be achieved for all users or that the development would support sustainable patterns of movement.

Signed

Senober Khan
19 August 2026