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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: 26/00219/FP
HCC ref: NH/28166/2026
HCC received: 12 February 2026
Area manager: Manjinder Sehmi
Case officer: Senober Khan

Location

Evangelistic Church , York Way, Royston, Hertfordshire, SG8 5HJ

Application type

Full Application

Proposal

Full Planning Permission : Erection of two storey church following demolition of existing single storey church and creation of pedestrian 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 for the following reasons:

The HA objects to the application in its current form because the applicant has not provided the essential transport evidence required to demonstrate that the development would deliver safe and suitable access for all users or avoid an unacceptable impact on the local highway network. The applicant has not substantiated assertions regarding unchanged attendance levels, catchment, trip generation, or existing parking operation. The proposal therefore fails to comply with the NPPF (2025) "Promoting Sustainable Transport", the Hertfordshire Local Transport Plan (LTP4), and Hertfordshire County Council's Highway Design Guide (2023), all of which require robust, proportionate evidence to assess transport impacts and ensure highway safety.

Highways comments:

Following review of the submitted information by the Highway Authority (HA), including the Design and Access Statement (DAS) and details within the application form, the HA provides the following comments.

The proposal seeks the demolition of the existing single-storey church and the construction of a replacement two-storey building broadly on the same footprint. The scheme retains the existing vehicular access from York Road/York Way and proposes to reconfigure the car park to provide 28 formally marked spaces, including EV charging. A new pedestrian access onto the existing public footway is also proposed.

The applicant states that the size of the congregation will remain broadly unchanged and asserts that approximately 85% of attendees currently live within Royston. However, no evidence has been provided to substantiate these claims. Although the application form states that the existing building has a floorspace of approximately 350m² and that the proposed replacement building would have a footprint of circa 380m², no detailed breakdown is provided in the DAS or supporting documents, particularly regarding gross internal area (GIA) or total usable floorspace, nor the net uplift between existing and proposed. This information is fundamental to understanding expected activity levels, occupancy, and trip patterns.

The application therefore appears to rely on assumptions that the HA will accept the applicant's statements "at face value," without the necessary transport evidence to justify them. This is not how the HA operates. The HA requires robust, quantified, evidence-based information to assess highway safety, access suitability and potential impacts on the wider network.

The proposed development is likely to represent an intensification of use, accommodating an expanded range of activities including youth clubs, food bank operations, a community café, classrooms, and holiday meal provision. Despite this, the application provides no trip generation assessment, no mode share evidence, and no arrival/departure profiles for Sunday services, weekday/evening activities or seasonal/special events.

No information is presented on how the existing parking currently operates, including peak usage, occupancy levels, duration, turnover, queuing, or any overspill onto the local highway network. While parking quantum falls under the remit of the Local Planning Authority, the HA must determine whether the operation of access and parking, particularly at peak times, would result in highway safety risks or displacement onto surrounding streets.

If the applicant maintains that attendance numbers will remain the same, despite an increase in floorspace and expansion of activities, the HA requires a clear, enforceable explanation of how this will be maintained. This should include the specific controls and mechanisms to prevent growth (e.g., booking systems, caps, staggered timings), how these measures will be monitored, and what mitigation triggers will apply if thresholds are exceeded. Without a robust Access and Events Management Plan, capable of being secured by planning condition and independently monitored, the HA cannot accept these claims as reliable.

In the absence of clear information on floorspace uplift, existing and forecast attendance, trip generation, parking performance and access safety, the HA cannot determine whether the proposal would result in a material increase in vehicular movements or whether the residual cumulative impacts would be severe, as defined by NPPF (2025). Accordingly, the HA is unable to confirm that the application provides safe and suitable access for all users or would avoid an unacceptable impact on the operation of the surrounding highway network.

Specific evidence required to substantiate assertions and lift the HA's objection

A. Congregation and Catchment (substantiate the "85% within Royston" claim)

- Anonymised postcode/zone survey over at least three weeks, covering two typical Sundays and multiple weekday sessions.

- Method statement covering GDPR compliance, survey methodology, sample size, bias correction and extrapolation.

B. Existing Site Use and Attendance

- Door counts of all visitors/worshippers recorded over three consecutive weeks for:
 - o Sunday services (typical and high attendance),
 - o Weekday daytime uses (food bank, café, classes),
 - o Weekday evening uses (youth clubs),
 - o Holiday programmes.
- 15 minute interval arrival/departure profiles to identify peak compression.

C. Mode of Travel and Car Occupancy

- On site intercept travel surveys capturing mode choice and car occupancy for all sessions over the same three week window.
- Summaries for key time periods to form an accurate baseline mode share.

D. Car Park Operation (baseline)

- Car park accumulation surveys (15 minute intervals), including occupancy, turnover and internal conflict points.
- On street parking beat surveys within an agreed study area for two Sundays and two weekday peaks.

E. Forecasts and Assessment

- TRICS based person and vehicle trip generation for:
 - o Typical and peak Sundays,
 - o Weekday daytime uses,
 - o Evening sessions,
 - o Holiday programmes.
- Forecast arrival/departure profiles and parking accumulation with sensitivity testing.

F. Access and Layout Safety

- Speed survey and visibility splay drawings.
- Internal pedestrian routes, inclusive design, LTN 1/20 cycle parking, blue badge bays.
- Swept paths for refuse, servicing and emergency vehicles.
- S278 General Arrangement and Stage 1 Road Safety Audit.

G. Management Plans and Construction

- Access and Events Management Plan.
- Car Park Management Plan.
- Delivery & Servicing Plan.
- Construction Traffic Management Plan.
- Surface water and drainage statement (no discharge to public highway).

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Hertfordshire County Council's Highway Design Guide (2023), all of which require robust, proportionate evidence to assess transport impacts and ensure highway safety.

Signed

Senober Khan

5 March 2026