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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: 25/01514/FP
HCC ref: NH/25598/2025
HCC received: 22 December 2025
Area manager: Manjinder Sehmi
Case officer: Senober Khan

Location

Whitehorse Service Station, Clothall Road, Baldock, Hertfordshire, SG7 6PD

Application type

Full Application

Proposal

AMENDED PROPOSAL

Full Planning Permission : Erection of shop, forecourt canopy, car and jet wash, car and cycle parking, EV vehicle charging points, hard and soft landscaping, and bin stores following demolition of existing buildings

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:

Given the applicant has still not satisfactorily addressed the concerns raised or committed to implementing the necessary improvements outlined in the HA's previous comments, the HA maintains its objection. The proposal presents unresolved risks to highway safety and user convenience and does not comply with national or local transport and planning policies.

Highways comments:

The Highway Authority (HA) has reviewed the applicant's consultant's response dated 26 November 2025 to the HA's comments of 9 November 2025 and provides the following consolidated position:

1. Planning Context and HA Remit

Under planning law, the applicant does not require permission to continue operating as a petrol filling station (PFS). However, because planning permission is sought for redevelopment and the existing infrastructure will be demolished, the HA is entitled to require improvements necessary to meet current planning and highway policies and design standards.

This authority is supported by both national and local policy, including the latest National Planning Policy Framework (NPPF, December 2024), which requires developments to:

- Provide “safe and suitable access for all users” (para. 110).
- Ensure that “residual cumulative impacts on the road network would not be severe” (para. 111).

The A507 (Clothall Road) is classified as a single 2-lane principal distributor road with a 40 mph speed limit. Any queuing or reversing at the site access creates significant safety risks, including collision hazards, reduced visibility, and congestion. The site layout must therefore prevent reversing and provide sufficient internal stacking capacity to avoid vehicles queuing onto the A507, ensuring compliance with national policy and highway safety standards.

Current policy and guidance now place even greater emphasis on prioritising pedestrians and cyclists in new developments and highway schemes, reflecting the shift towards sustainable and inclusive transport design. Therefore, the HA’s recommendations are policy-driven, not discretionary, and aim to secure compliance with modern standards of safety, accessibility, and sustainability.

The HA is fully aware of its statutory duties under planning and highway law and does not require clarification from the applicant’s consultant regarding its remit, responsibilities, or limitations. The HA’s remit includes ensuring that site access arrangements do not compromise:

- Highway safety
- Operational efficiency
- The needs of all including vulnerable road users, both within the site and on the surrounding highway network

Specifically, the HA’s responsibilities cover preventing adverse effects on the public highway, such as:

- Queuing or reversing onto the carriageway.
- Intervisibility conflicts.
- Collision risk at the access.

The consultant’s statement characterises multiple manoeuvres as an “occasional minor inconvenience.” In practice, the following effects can and do translate into highway safety and network operation concerns, where on-site layout does not enable vehicles to enter, circulate, and exit safely and predictably, this can lead to material highway safety concerns and network impacts:

- Where vehicles must reverse or perform multi-point turns in proximity to the site egress, drivers may encroach into the highway or visibility splays, creating conflict with through traffic, cyclists, and pedestrians.
- sub-optimal internal geometry and insufficient aisle widths can cause vehicles to hesitate or re-position, leading to stacking back to the access and, at peak times, queueing onto the public highway.

Consequently, the HA does not accept the assertion that internal tracking has no bearing on the local highway network.

Policy and guidance require that substandard layouts and design deficiencies are eliminated at the design stage, not left to chance or managed through operational measures. Good design must

proactively address foreseeable hazards and inefficiencies to deliver safe, compliant, and sustainable access arrangements from the outset.

2. Parking layout and access:

The HA notes the consultant's comments regarding the location of the disabled parking bay and visibility concerns. While Building Regulations Part M does not prescribe a specific distance, and BS8300-1 guidance suggests a maximum of 50m, the HA's position remains that accessibility should be prioritised through practical design, ensuring the shortest and most convenient route to the entrance for mobility-impaired users. Although the proposed 10–15m distance meets technical guidance, the HA encourages consideration of best practice by positioning the bay as close as reasonably possible to the entrance to minimise reliance on operational management or staff assistance.

The HA does not accept the assertion that there is “no visibility issue.” The proposed layout introduces elements (totem signage, vegetation, and retained geometry) that constrain sightlines for pedestrians and vehicles at the access. Manual for Streets and local design guidance emphasise the need for clear intervisibility between drivers and vulnerable road users. These principles apply regardless of whether the site is an existing PFS.

The HA acknowledges the consultant's clarification that vegetation will be maintained below 600 mm and that the totem sign will not obstruct sightlines. However, the HA requires these commitments to be secured through the approved landscaping and signage plans, with ongoing maintenance to prevent future visibility issues. This is essential to safeguard pedestrian safety and maintain compliance with highway design principles.

The HA's main concern relates to the car wash exit, where the driveway runs adjacent to the forecourt entrance. Pedestrians may walk toward the egress point from the retail entrance while vehicles exiting the car wash, instead of turning left to leave, could continue straight to refuel or park in the bays opposite. This creates potential safety risks, as no pedestrian visibility splays are provided and no physical measures are proposed to prevent pedestrians from crossing paths with these vehicles.

While these matters primarily involve on-site arrangements, they directly affect safe and inclusive access. The HA therefore requests that the applicant:

Considers relocating the disabled bay closer to the entrance.

- Confirms maintenance measures for vegetation and signage to ensure visibility remains unobstructed.
- Provides pedestrian visibility splays at the car wash exit to ensure clear sightlines for both drivers and pedestrians.
- Confirms maintenance measures for vegetation and signage to ensure visibility remains unobstructed.

3. Current site and design requirements – policy compliant:

While the Transport Statement (TS) refers to “four domestic pump islands (8 fuel bays),” the current site contains only a single petrol pump at the rear of the forecourt. All referenced domestic pump islands and offset filler points do not exist for fuel dispensing. The redevelopment therefore constitutes a new planning application and triggers the requirement to apply current design standards, not retain outdated arrangements.

The applicant must design a layout that allows safe and efficient access to every element of the development without compromising safety on-site or on the public highway. Design decisions should not be driven by convenience or cost-saving measures at the expense of public safety or operational

efficiency. Good design must proactively eliminate foreseeable hazards and inefficiencies to deliver modern standards of accessibility, safety, and sustainability from the outset.

The consultant suggests there is “no obligation” to upgrade access because trip generation is unchanged, consequently no policy basis for improvement. This interpretation is incorrect. NPPF and local transport policy require safe and suitable access for all users, not merely an absence of severe cumulative impact.

The HA is not seeking improvements based on projected traffic growth but rather on the opportunity to address known design deficiencies that compromise safety and accessibility.

It should be noted that the traffic impact assessment in the Transport Statement (TS) was based on the approach that the proposal includes the same number of fuel bays, albeit with one less pump, and that trip rates for petrol filling stations (PFS) are typically calculated based on fuel bays or site area, not shop size. On this basis, the TS concluded that the development would not result in an increase in trip generation.

However, the TS did not undertake any comparative trip generation analysis against the existing use, except for parking accumulation purposes. Furthermore, no information has been provided regarding how long the site has not operated as a commercial PFS. Evidence suggests the site has functioned primarily as a vehicle service station for a considerable period (google streetview) over 10 years, which implies that the proposed use is likely to generate significantly more trips than the current servicing-based only operation.

Furthermore, to clarify the absence of recorded collisions does not negate the need for compliance with current standards. Risk-based design is forward-looking; it addresses foreseeable hazards before incidents occur. Reliance on historic data alone is not an acceptable basis for refusing design improvements.

4. Swept Path Analysis – Operational Risks

The HA does not accept that on-site tracking is purely an internal operational matter with no bearing on highway safety or the local network. Constrained geometry that necessitates multiple manoeuvres near the access can produce predictable safety risks and operational impacts (including queuing onto the highway).

The submitted swept path drawings are misleading. They depict a Luton van entering and exiting the site in a single manoeuvre, which is unrealistic. In practice, vehicles will park parallel to the pump and further along so the fuel filler aligns with the pump handle. Tracking must therefore demonstrate how a vehicle or van, parked at the pump, can manoeuvre from that position to exit the site.

If parking bay 11 is occupied, likely to be the most popular bay as it is closest to the entrance, and particularly if a large car overhangs beyond the bay (as shown on the submitted plan), a Luton van or even a standard car would be unable to leave in a single forward movement without multiple manoeuvres. This creates risks of reversing with blind spots of drivers walking to kiosk/store and potential encroachment into visibility splays and queuing back to the highway.

The HA requires revised swept path analysis showing each pump position with vehicles able to park parallel to the pump in one manoeuvre and then exit safely, assuming all other pump and visitor bays are occupied. This is essential to ensure vehicles are not dependent on other drivers to enter or leave bays, thereby maintaining safe and efficient operation without compromising on-site or highway safety.

5. Access Geometry and Pedestrian Safety

The submitted tracking indicates that proposed vehicle accesses are unnecessarily wide, forcing pedestrians to cross longer crossover points. The only apparent justification for this width is to accommodate petrol tanker movements and the offset filler location, which leaves no margin for error. Current tracking shows tankers turning into and out of the site encroaching on or close to footpath kerbs and the filler island. In practice, petrol stations often close the forecourt during tanker deliveries to manage these risks.

The applicant should:

- Consider relocating the filler island and pumps further into the site to allow tankers to manoeuvre without requiring excessively flared accesses.
- Alternatively, reposition pumps and filler points to achieve a safer, more efficient layout, supported by a banksman during deliveries.
- Provide continuous, level footpaths at both accesses, incorporating dropped kerbs for vehicles to ensure pedestrian priority (policy compliant) and encourage slow, safe vehicle turning.
- Include pedestrian visibility splays at all crossing points and site accesses to safeguard pedestrian safety and comply with highway design standards.
- Ensure that all layout options are fully appraised and discounted only if found impractical or contrary to policy and safety requirements.

6. Additional Design Considerations

Cycle Parking: The proposed 4 no. cycle spaces are shown as open and unsheltered. To comply with best practice and encourage sustainable travel, cycle parking should be covered with a canopy or suitable shelter.

Peak Demand and Queuing: The applicant must assess peak-period demand and internal stacking capacity to demonstrate that vehicles do not queue back onto the highway during busy times, including worst-case scenarios (e.g., simultaneous arrival of larger vans and passenger cars).

Road Safety Audit: A Stage 1/2 Road Safety Audit (and Designer's Response) is required for the site access and immediate internal layout fronting the public highway to identify and address foreseeable safety issues at design stage.

Recommendation

Given the applicant has still not satisfactorily addressed the concerns raised or committed to implementing the necessary improvements outlined in the HA's previous comments, the HA maintains its objection. The proposal presents unresolved risks to highway safety and user convenience and does not comply with national or local transport and planning policies.

On the basis of the above comments, the HA maintains its objection will remain until satisfactory revised plans are submitted, incorporating the following:

- Upgraded crossover geometry to current standards.
- Improved visibility for pedestrians and vehicles.
- Removal of design deficiencies identified in previous HA comments.
- Revised swept path analysis addressing realistic operational scenarios.
- Enhanced pedestrian priority and safe tanker manoeuvring arrangements.
- Covered cycle parking
- confirmation of queuing mitigation measures.
- Completion of a Stage 1/2 Road Safety Audit.

Signed
Senober Khan

30 December 2025