

Project Name	Starwood House, Letchworth Garden City
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Subject	Response to HCC consultation comments
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Reference	25034
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Date	July 2025
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Overview

- 1.1. KMC Transport Planning Ltd ('KMC') has been commissioned by Letchworth Investment LLP (the 'Applicant') to provide transport planning consultancy services for the redevelopment of Starwood House ('the site') in Letchworth Garden City, Hertfordshire.
- 1.2. A planning application has been submitted to North Hertfordshire District Council (reference 25/01196/FP) for the redevelopment of the site to provide a flexible employment use comprising E(g)(ii) Research and development of products or processes, E(g)(iii) Industrial processes, B2 General industrial and B8 Storage and distribution land use classes. The proposed development proposes three units with a combined Gross Internal Area (GIA) of 11,929 sqm.
- 1.3. In their role as the local highway authority, Hertfordshire County Council (HCC) provided their consultation response to the planning application on 19 May 2025.
- 1.4. The purpose of this note is to provide a response and further comment to the key points raised by HCC. The points raised by HCC are provided in italics followed by KMC's response.

Site access

'The Starwood House site is located on a Strategic route in NHDC's adopted LCWIP (Local Cycling and Walking Infrastructure Plan, September 2023) the design of which is being fast tracked (initial site visit was undertaken 17 June 2025) to determine as to whether or not the proposals will have a impact or not on the LCWIP route'.

- 1.5. The aspiration to provide improved walking and cycling facilities on Avenue One is acknowledged. However, the LCWIP provides little detail in terms of the design of such improvements. No programme for delivery or design detail beyond a figure identifying the route for a segregated cycle route has been developed.
- 1.6. There is no design detail of the proposed segregated cycle route for the development to respond to. In the absence of any design at even the preliminary level, it would not be acceptable for HCC to object to the proposals on the basis of the development affecting an as of yet, undefined cycle route.

- 1.7. Furthermore, the application includes proposals to modify the access and are a significant improvement on the existing arrangement. Nothing that is proposed through the planning application would fetter the ability for future changes associated with the LCWIP aspirations to be made.

'Furthermore, it is considered that the junction needs to be altered to make the pedestrian crossing more regular and closer to 90deg to the kerb. This could be done by moving the proposed radius closer to the junction'.

'It is also considered that the internal access road could be reduced in width to reduce the width of the crossing and so that the space can be used more efficiently on site'.

- 1.8. The existing junction arrangement is characterised by large kerb radii's, an access road that incorporates a central island, both of which contribute towards an excessive crossing distance for pedestrians travelling along Avenue One.
- 1.9. The development proposal provides a significant improvement on the existing situation. Tighter radii's, a narrower access and shorter crossing distances are complemented by more formal dropped kerb and crossing facilities.
- 1.10. Swept path vehicle analysis has been used to define the size of the access. The design seeks to minimise the scale of the access whilst maintaining access for the larger vehicles which may visit the site, albeit infrequently. Constraints such as on-street parking have been considered in this context and the junction is considered to be as small a scale as possible.

Travel Plan

'Whilst the Framework Travel Plan is suitable for this stage in the planning process it will require further work to discharge any subsequent planning condition'.

- 1.11. The wider comments made by HCC are considered broadly acceptable. It is agreed that the requirement for a Site-wide Travel Plan can be secured by planning condition. The Travel Plan document that will be prepared to discharge the condition in due course can be updated.

S106 Contributions

'HCC Highways operate two levels of mitigation agreements (Strand 1 and Strand 2). Strand 1 mitigation works being works that are directly required to unlock the development and solely the responsibility of the development. Strand 2 mitigation works being works that address the wider cumulative impact of the development for which the development isn't solely responsible for but does derive benefit from.'

'In the first instance (Strand 1) HCC would envisage that the agreed site access junction once agreed is delivered through a S278 agreement and travel plan contribution is contained in a S106 agreement'.

- 1.12. The suggested Strand 1 contributions, the access junction improvement through a s278 agreement and Travel Plan contribution are agreed.

'In the second instance (Strand 2) HCC calculate an appropriate headline figure based on the findings of HCC's adopted Developers Planning Obligation Toolkit (2021)'.

'A review of the TRICS database (considering sites within England and Wales surveyed in the last 10 years (excluding the covid lockdown period) suggested that a site of this nature could create approximately 128 jobs. Therefore, in order to address the cumulative impact of development HCC would normally expect a Strand 2 contribution of £78,080. This would be allocated to the aforementioned NHDC LCWIP to ensure HCC policy compliant development'.

- 1.13. The HCC document *Guide to Developer Infrastructure Contributions* (2021) sets out the way in which HCC seek financial contributions to mitigate the effects of development. Technical Appendix 1 *Transport* of the document is relevant and sets out the calculation for determining a financial contribution associated with transport matters.
- 1.14. The use of jobs as the key metric associated with employment sites is acknowledged. HCC has calculated that the development might result in 128 jobs and used the £610 tariff identified in Technical Appendix 1 to arrive at the suggested contribution.
- 1.15. Should Strand 2 contributions be considered necessary, the existing site and use should be used to determine the overall transport effects. As an existing employment site, existing jobs are already in place and should be considered when calculating any prospective Strand 2 payment.
- 1.16. Using the existing floor area of 6,132 sqm and proposed floor area of 11,929 sqm, and applying the ratio of floor area to jobs used by HCC to arrive at 128 jobs associated with the proposed use, the overall increase in jobs might be 62 (66 existing jobs).
- 1.17. Accordingly, a Strand 2 contribution of £37,943 would be more appropriate.