GREAT ASHBY COMMUNITY COUNCIL RESPONSE TO PLANNING APPLICATION

23/02492/FP | Residential development of 292 dwellings and associated roads, parking, drainage, landscaping, open space, servicing facilities and associated works. | Land At Roundwood Back Lane Graveley Hertfordshire

At a meeting of the Full Council on 21 December 2023, Great Ashby Community Council (GACC) resolved to **OBJECT** to Planning Application **23/02492/FP**.

Planning applications were previously submitted in 2010 & 2016 for this site. The applications did not receive the support of the local community. Comments in 2016 included objection due to major concerns with the lack of adequate infrastructure, the access to the site, insufficient education and health facilities, and the impact on an existing residential area. Great Ashby Community Council submitted a response objecting to the 2016 application and supported this objection with an independent Travel Assessment which was commissioned jointly with Weston Parish Council and Graveley Parish Council. This planning application was not taken forward but has not been withdrawn.

In November 2022, prior to this current reworked planning application, the developers held a public exhibition at Great Ashby Community Centre. Councillors from Great Ashby Community Council attended the public exhibition and observed public opinion. Concerns from the community mirrored that raised in 2016, namely the poor access to the site, utilising Back Lane which is inadequate, increased traffic through Mendip Way, Haybluff Drive, Calder Way, Bray Drive and Nevis Road, the existing parking problems in these roads, an increased burden upon Great Ashby Way which already suffers from congestion at peak times of the day, plus the general lack of infrastructure in Great Ashby.

Considering the huge impact this development would have on the existing residents of Great Ashby, and bearing in mind the developer's failure to gain community support, it is disappointing that Great Ashby Community Council was not given the opportunity to contribute to the Masterplan or input into the early planning process, before the submission of this new amended full planning application. This current planning application has unfortunately not addressed residents' concerns; concerns as described in the Santec document 'Statement of Community Involvement'.

Site Access & Road Infrastructure

According to p6 of the Stantec *Statement of Community Involvement*, access to the site was the community's main concern with development on Roundwood. This Council concurs that the access and existing road infrastructure is inadequate to support a development of the size proposed on this site.

The Applicant has stated that,

Following the event, a full audit of other access options was undertaken. The result of this was the retention of the two access points, which are the most expedient route into and out of the site. (p7)

It would be helpful if the Applicant shared the alternative access options it considered – there may be an option which is more acceptable to the existing community.

In consideration of the issues associated with the access and existing road infrastructure associated with this application, this Council found that the planned access routes are not in keeping with the vision set out in Hertfordshire County Council's Local Transport Plan LTP4 which, in the hierarchy of transport users, considers the needs of more vulnerable road users a priority. Further, the Local Plan Policy T1 states that permission will only be granted where

Development would not lead to highway safety problems or cause unacceptable impacts upon the highway network.

This Council believes the proposal submitted does not satisfy the requirement.

Our reasoning follows:

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Back Lane is in part a single-track road currently used by pedestrians, cyclists, horse riders and motor vehicles. (fig 1, 2 & 3). This is a route frequently used by equestrian traffic to access the nearby stables. There have been recent incidents which have endangered horses and riders on this road. It has no pavement but is well used by walkers. increasing the number of vehicles will cause more safety issues for these more vulnerable road users. Turning right onto Back Lane from the site towards Graveley, the road is unsuitable for heavy good vehicles. Turning left, traffic would be forced through Calder Way due to the plan to prohibit traffic from a section of Back Lane.

The routing of Back Lane so as to force traffic through the new development would encourage a rat run through a residential area and in our view is unsafe.

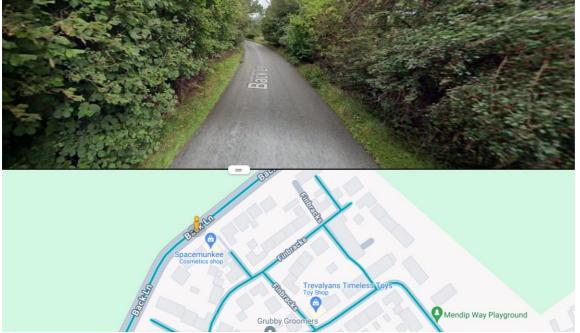


Figure 1 Back Lane at the point of the proposed access to the site facing towards Weston (Image: Google maps)



Figure 2 Back Lane at the junction with Calder Way towards Weston (Image: Google maps)#

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Figure 3 Back Lane at the junction with Calder Way towards Graveley

Calder Way is also a single-track road in which vehicles pass by making use of the entrances to the residential drives and closes (fig 4). There is no pavement on this road. Increasing traffic on this road will be dangerous to residents and their families, as well as other vulnerable road users. It is clearly an inappropriate access route and is consequently totally incapable of supporting construction traffic.



Figure 4 Calder Way (Image: Google maps)

Bray Drive/Mendip Way and Haybluff Drive are residential streets within Great Ashby (fig 5, 6 & 7). All of these roads have on-street parking due to the insufficiencies of the original development design and inadequate parking allocation at the time of building. Hertfordshire County Council has recently approved work to create sections of double yellow lines near some junctions in Mendip Way for reasons of highway safety. This has reduced the available parking for existing residents.

Changes outside of the development site to the existing roads within Great Ashby will have a negative impact on the character of the landscape and general amenity of the area. These plans show no regard for the health, safety and welfare needs of the current residents, who are set to lose the ability to park outside their own homes regardless of their personal circumstances. Homes which they purchased knowing they were suitable for their requirements, may no longer suit their purpose.

To remove grass verges and create parking bays along these roads would reduce the distance between the highway and residents front doors. This is an issue due to the location of some properties along these roads whose front doors are already in close proximity to the pavement. There are additional safety concerns as this would become a bus route and there would be considerably more vehicles travelling these roads.

The alternative, to create double yellow lines along these roads would be detrimental to the existing residents and there is simply no free space available to utilise for parking. During the public exhibition held by the developers, there was indication that the new proposed development would contain additional parking allocation to support the lack of provision in the nearby streets from their already low parking allocation. This does not seem to be the case from the plans provided. Again, this option raises safety issues with more pedestrians, including vulnerable road users, needing to travel further from their homes to access their vehicles in an environment with increased traffic and more congestion.

The hybrid solution as proposed by the developer in the Transport Assessment, 10.10 A scheme for the relocation of on-street car parking on Bray Drive, Mendip Way and Haybluff Drive is proposed. This will comprise a combination of 'in verge' parking bays and on-street parking, with a Traffic

Regulation Order being required to facilitate the waiting restriction required to fully implement the scheme.

This is not an acceptable solution. It does not resolve the problem of where existing residents would now be expected to park. This solution prevents residents from parking in safe locations, such as across their driveways, because of a requirement to park in a designated parking space. And in other parts of the road, cars will be parked in close proximity to people's front doors. A scheme which imposes such controls on existing residents, when they already have difficulty from the original development's low parking ratio is unacceptable. The Applicant seems to be suggesting in their Transport Assessment that residents should park within the parking courts which are reserved for specific properties. Of course, this would not be permitted.

Our experience of the few parking restrictions within Great Ashby is that they are not enforced. How is it proposed that a solution of this type would be implemented and enforced in practice?

In addition, we object to any routing of construction traffic through these residential streets which we consider would be inappropriate due to the impact on the lives of the existing residents, the negative impact on air quality and the disturbance through noise. The construction phase would be intolerable for existing residents if construction traffic accessed the site through these roads.

Nevis Road

This road is a residential road without verges which would be a short cut for vehicles travelling from Haybluff Drive to Mendip Way (fig 5). It is likely to see an increase in traffic should the development proceed and is a potential rat run. Consideration needs to be given to the impact on residents in this road.



Figure 5 Nevis Road (Image: Google maps0

Transport Plan

HCC Local Transport Plan 2018 (LTP4) page 47 states that,

In recent years changes to the planning system have tended to separate land use planning and transportation planning even further. As a result in Hertfordshire the spatial patterns of allocated development sites, although potentially suitable in other respects, do not easily support the delivery of sustainable transport solutions.

It is this Council's opinion that the GA1 Roundwood site is one such site. The lack of suitable existing road network causes significant problems for Great Ashby, Weston & Graveley in the provision of a safe and sustainable access solution to reach this site.

HCC LTP4 Policy 5 includes a clause to,

Resist development that would either severely affect the rural or residential character of a road or other right of way, or which would severely affect safety on rural roads, local roads and rights of way especially for vulnerable road users. This should include other routes which are important for sustainable transport or leisure.

The proposed development destroys the rural nature of Back Lane and cuts the rural link between the villages of Weston and Graveley by diverting it through a built estate. The plan creates a rat run, diverting traffic through rural and residential roads which are unsuitable for through traffic, thereby putting vulnerable road users such as pedestrians, cyclists and horse riders in greater danger.

Solutions need to include safe routes for all road users, including equestrian traffic. Ideally the use and development of the right of way network would provide for a circular route which would provide safer and sustainable travel. This needs to consider the points where existing roads in Great Ashby or the villages intersect with bridleways or footpaths, and consider the need to upgrade these routes to support all of these vulnerable users. For example, the Bray Drive/Mendip Way bridle way crossing point (which could potentially be on a bus route if this application proceeds), and the impact on the points where increased traffic intersects with crossing Great Ashby Way using the right of way network.

The topic of safety crossing Great Ashby Way is a one that this Council has previously discussed with our County Councillor, Steve Jarvis, and it is an important consideration which has not been thoroughly investigated from what we have read in the application. Based on the car parking provision detailed for this site, it is clear that an additional 650+ cars, together with the service vehicles to these properties, and the construction traffic preceding this, will have a detrimental effect, adding to congestion already present on Great Ashby Way and the difficulty pedestrians and other vulnerable road users already experience crossing this road.

The RoWIP covering 2017-18 to 2027-28 provides information on the potential upgrades to the PRoW network with the vision to develop more circular routes. We would strongly urge that HCC Countryside Rights of Way input into solutions which benefit all road users. This is also important for their consideration of changes which may impact The Hertfordshire Way.

Should this development proceed, and HCC are in agreement, it is our view that s106 funding should be made available to HCC to provide two Pegasus/pelican crossing points on Great Ashby Way to provide priority crossing for the PRoW users and also a suitable safe crossing is installed across Bray Drive/Mendip Way for users of the PRoW.

Parking Survey

It is our view that the on-street parking survey is insufficient to provide a representation of the parking problems in this area of Great Ashby. A survey at 3 moments in time on 3 days in the same week does not seem a good premise on which to base a survey. Without also surveying the side roads adjoining, the extent of the parking problem cannot be seen. A more in depth survey is needed to ascertain whether alternative parking for these vehicles and properties is possible and whether the existing residents' needs can be served through any solution the developer proposes.

Proposed Impact on Local Highways

10.11 of the submitted Transport Assessment, states,

The traffic attracted to the proposed development has been derived from local trips rates derived from survey data collected of the arrivals and departure into/out of Mendip Way and is therefore considered to be appropriate to consider the impact that the proposed development will have on the local highway network. It is likely that the sustainable travel improvements associated with the development will reduce trip rates below those recorded in the 2022 surveys.

This is flawed and it is our opinion that it is an inaccurate way to predict the impact on the local highway network. There are alternative routes vehicles can take to enter and leave the site rather than use Mendip Way.

In addition, sustainable travel improvements are, in our view, unlikely to reduce trip rates due to the lack of facilities within Great Ashby and the need for residents to journey further afield. Journeys to school in Weston or Graveley will need to be by car for safety reasons. There is no direct public transport to local GP facilities, Stevenage Old Town, the Gunnels Wood Industrial area or the hospital. With schools and local employment likely to require the use of two buses, it would seem a sustainable option is the less attractive one for many residents in Great Ashby.

Cycleways

The developer has indicated that,

10.9 A further financial contribution will be provided in accordance with Hertfordshire County Council Guide to Developer Infrastructure Contributions (2021). This contribution would be provided only to support schemes that directly promote access to the Site for sustainable and active modes of transport, with a contribution towards the completion cycleway Route 2 as defined in the Stevenage Local Cycling & Walking Infrastructure Plan being considered the most appropriate, but other contributions would also be considered.

Great Ashby Community Council was involved in the North Herts LCWIP due to the parish residing in North Herts. It was not involved in the Stevenage LCWIP and would like to be consulted prior to any cycleway improvements in Great Ashby so that local views and the priorities of our parish can be shared.

Other Infrastructure

Great Ashby is considered a town in its own right for the purposes of hierarchy in the Local Plan. In terms of population numbers, this is true. However, Great Ashby lacks essential amenities such as a GP, a dentist, a secondary school and outdoor leisure facilities including sports pitches and courts. Our local primary school, Round Diamond, is oversubscribed forcing Great Ashby's children to travel further to school. The Great Ashby Neighbourhood Centre Car Park is currently in need of repair including lighting issues and pot hole repairs. Unfortunately as this car park was owned by a private company which is no longer trading, this car park is left without plans in place for maintaining it.

If this development proceeds, and NHC are in agreement, we request that NHC is provided with reasonable s106 contributions to support the purchase and repair of the Great Ashby Neighbourhood Car Park. We view this as a reasonable request to safeguard the centre for residents with the Local Plan providing justification under paragraph 4.49, stating that

The Council [NHC] wants to improve and protect the District's centres [including Great Ashby], reduce the need for unnecessary travel to alternative facilities and ensure that the proportion of expenditure going outside the District does not increase.

GACC has an obligation to provide allotments and has demonstrated that there is a local need. We are aware that there is s106 funds available in principle but would like to request that NHC consider whether suitable land provision would be available within this site.

Housing

The character statement (Stantec *Statement of Community Involvement, p20*) presented at public exhibition held in November 2022 stated that '[t]he proposal would include a mix of housing types, mostly comprising two storey housing with occasional three storey properties in appropriate locations.'

The housing detail actually provided in the current application seems to make significant use of 3 storey apartment blocks and 2.5 storey properties, which result in a high percentage of the allocated homes provided through this type of housing. This is not consistent with Local Plan Policy HS3(b), that '[t]he scheme would provide a density, scale and character of development appropriate to its location and surroundings.'

The Local Plan Strategic objective SOC1 reads

Identify locations for a range of types and tenures of homes, including affordable homes, to meet identified needs and provide adequate housing for an increasing and ageing population.

It is GACC's opinion that the mix of housing type has not been properly considered within this application; we have not been able to find reference to the consideration of the housing needs of the local area. There is no Housing Needs Assessment provided and in particular, we feel that based on the rising percentage of older people living in

Great Ashby (based on a comparison of ONS census data), the need to provide suitable housing for an increasing and ageing population has been neglected. Local Plan Policy H4 states that

Planning permission for residential developments of 100 units or more will be granted provided that an element of accommodation within Use Class C3 for older persons housing is included under the requirements of Policy HS3(a).

Allocating dedicated supported housing for older people would be of potential beneficial to existing Great Ashby residents and release larger properties onto the market.

Should planning permission be granted, GACC requests that a condition restricts the properties from being used as a Home of Multiple Occupancy due to the high volume which currently exist in this area.

Parking allocation

Local Plan Policy T2 provides that

Planning permission will be granted provided that: ... d) Applicants clearly identify how they provide for all likely types of parking demand and demonstrate that parking will be safe and of a design and layout that will function satisfactorily.

GACC do not feel the parking provision is sufficient or will function well on this site. If parking is removed from the existing Great Ashby development, this should be compensated within this site. It seems impractical for existing Great Ashby residents to have to walk the new proposed site in search of parking.

The garage sizes are below the Local Plan minimum of 7m x 3m internal threshold and therefore do not count towards parking allocation. This means that the garages are most likely unsuitable for a modern car, nor can they be considered suitable for dual use as car parking and cycle storage. It would be GACC's preference that no garages were provided on the site to minimise the loss of parking when they are left unused or in the event that the garages are converted to habitable accommodation at a later date.

There seems to be a lack of covered cycle storage for the site – not all properties seem to have allocated storage.

The car barns count towards parking allocation. However, these seem narrow and impractical. Residents allocated parking seems split so that their spaces are not located together, one in a barn and one elsewhere. It would seem that allocated parking spaces for a property which are together, next to homes would fit better with national design guidance.

Energy and Sustainability

It is recognised that the apartment blocks are designed with solar panels. It would be good to see this extended to all house types, and the layout of homes redesigned to maximise the use of sunlight in the provision of renewable energy. This would support North Herts Local Plan Strategic Objective ENV4 to

Mitigate the effects of climate change by encouraging the use of sustainable techniques, the appropriate use of renewable energy technologies and reducing the risk of flooding.

Health Impact Assessment

This Council recognises that this proposed development could impact greatly on the safety and social, physical and mental health of existing residents. According to Hertfordshire County Council's position statement on HIAs, it would seem appropriate for a HIA to be conducted prior to any approval of a full application for a development of 100 or more residential units. Please may we request this is conducted.

Ecological Impact Assessment

While it is acknowledged that the developer has completed past ecological surveys for protected species within the site for previous planning applications, these are over a year old and we feel they are inadequate.

For example, bats are known to be visible across this site and a survey which measures over 3 periods totalling 19 days does not seem to be a meaningful representation to demonstrate the extent of bats on the site.

Similarly, the survey of breeding birds was conducted on 4 days for 1.5 - 2 hours between 22 May 2021 to 9 July 2021. This is insufficient to identify many breeding birds as the nesting season officially runs from February to August (Natural England).

Public Transport

The SB7 bus route changed in September 2023. This is not reflected in this planning application. Arriva re-routed the service to include Bedwell which has resulted in journey times effectively doubling to reach Stevenage bus station. Moreover, the service now fails to pick up from Stevenage Railway Station causing severe inconvenience to travellers. GACC has written to Arriva, receiving no response, to try and work with them to find a solution as this service is currently unsatisfactory and unreliable. Extending this current inferior service to serve a new site at Roundwood would only further diminish the service.

It is our view that the Roundwood site design should allow for pick up and drop off within the new development rather than in Haybluff Drive or Mendip Way, to ensure that all future residents are within easy reach of public transport.

Drainage and Water Management

Please may we point out that there appears to be missing information; Appendix D Thames Water correspondence is incomplete; the start of page 4 of the document does not follow on from page 3.

Correspondence from Thames Water on 26 October 2021, contained within Appendix E, reads

We've assessed your foul water proposals and concluded that our sewerage network will not have enough capacity to accommodate foul water flows from proposed development. It will therefore be necessary for us to undertake investigations into the impact of the development by means of hydraulic impact study to determine possible connection points on the existing system, or what upgrades to the existing network are required, before the site can be connected to it.

We cannot see any confirmation of the upgrades needed to the foul water system. There seems some inconsistency with the Thames Water response to this planning application sent to NHC by email on 4 December 2023 which states:

Waste Comments

Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

This site and the adjacent area including Back Lane at the junction with Calder Way (fig. 6) shows that this area is liable to flooding due to surface water.

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Figure 6 Flood sign visible on Back Lane September 2021



Figure 7 Flooding on Back Lane 19 December 2023



Figure 8 Flooding on the site location 19 December 2023

We feel that the applicant has failed to demonstrate that the proposed development would adequately deal with surface runoff which could result in flood risk to the site and elsewhere and have environmental impact. There is correspondence with the Environment Agency and with Thames Water, however there seems to be no definitive plan which limits contamination into the environment.