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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: 25/01708/OP
HCC ref: NH/25777/2025
HCC received: 18 July 2025
Area manager: Manjinder Sehmi
Case officer: Senober Khan

Location

Land Opposite Heath Farm, Briary Lane, Royston, Hertfordshire, SG8 9BB

Application type

Outline

Proposal

Outline Application : Erection of up to 84 dwellings with public open space, landscaping and sustainable drainage system (SuDS) following demolition of No. 24 Echo Hill with all matters reserved save for 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:

Until appropriate measures are proposed to ensure that all dwellings are within a reasonable walking distance of a bus stop, with safe and accessible gradients, the HA is unable to support the application due to its failure to demonstrate a satisfactory, policy-led and design-led approach to accessibility, contrary to:

- Hertfordshire's Local Transport Plan 4 (LTP4) policy 5 (Accessibility) which promotes developments that are accessible by sustainable modes of transport, and policy 6 (Sustainable Travel) which seeks to reduce car dependency and prioritise walking, cycling, and public transport.
- Hertfordshire County Council's Place and Movement Planning and Design Guide (P&MPDG) which requires that access roads and internal streets be either level with the public highway or have gradients not exceeding 1 in 20 (5%), to ensure accessibility for all users, including those with mobility impairments.

- Manual for Streets 2 (MfS2) which reinforces the need for inclusive, accessible street design and supports gradient limitations to promote safe and equitable movement.
- National Planning Policy Framework (NPPF) specifically para 110 which requires developments to ensure safe and suitable access for all users, para 112 which promotes priority for pedestrian and cycle movements and access to high-quality public transport and para 130 which supports inclusive and accessible design that meets the needs of all users.

The absence of compliant access gradients, safe pedestrian routes, and proximity to public transport undermines the principles of sustainable development and inclusive mobility set out in both national and local policy.

Brief Description in support of Proposed Development by the applicant:

This Transport Assessment (TS) has been submitted in connection with a proposed development of 84 residential dwellings on land to the south of Echo Hill, Royston.

Executive Summary

The site can be accessed by sustainable forms of transport such as walking, cycling, bus and rail. The town centre shops are available within an 11minute walk and bus services are available throughout the day to local destinations. The Royston railway station is available within a short cycle ride where cycle and car parking is available at the station.

Vehicular access for the site will be via Echo Hill with an access provided in place of No 24 Echo Hill, which will be demolished.

The nationally recognised database TRICS has been used to forecast the new trips for the proposed development. The scheme is forecast to generate the following vehicle trips in a typical weekday peak hour which is a negligible impact on the highway network:

- 37 two-way vehicle trips in the morning peak hour (0800-0900);
- 38 two-way vehicle trips in the evening peak hour (1700-1800).

The scheme will not result in a highway impact that could be considered as severe in relation to the requirements of the National Planning Policy Framework.

The development would be supportive of improvements to footway infrastructure and travel plan measures to incentivise first dwelling occupants to consider non-car modes of travel where possible.

A Framework Travel Plan is submitted with this application. A full Travel Plan will be provided at Reserved Matters stage and secured by condition or Section 106 obligation. The Travel Plan would encourage sustainable travel to all site users by promoting a range of sustainable travel measures. The Travel Plan will be monitored over at least 5 years with the aim of achieving a set of agreed targets over the period.

Highways comments:

The application is an outline planning application for the erection of 84 residential dwellings including a new access arrangement from Echo Hill with all matters reserved except means of access.

The proposed car parking provision and layout is the responsibility of the LPA to determine the level and suitability of the car parking proposals, however, it is essential that it is operated in efficient and safe manner to minimise the impact on the local highway network which is the responsibility of the HCC HA.

As noted in the TA, the previous outline planning application (20/00744/OP) for 99 dwellings (all matters to be reserved for later determination save site vehicular access), was refused in April 2021 but was not refused on transportation grounds.

The HA has reviewed the submitted documents and has the following comments to make:

The Highway Authority acknowledges that the proposed development is not expected to have any significant impact on the operation or capacity of the local highway network

Whilst in the previous outline application the HA raised no objections, however that was in 2020, over time policies, guidance's, and designs are not static, they are continually evolving to be commensurate with current thinking, technology, priorities, etc. since then priorities in local and national policies have changed which now give greater weighting to ensuring developments are accessible by sustainable forms of transport such as walking cycling and in particular public transport in new developments. If the position is that the overall development proposals are no different to an approved in the past, then no improvements under current policies and guidance's can ever be implemented.

With new builds the planning process seeks/provides the opportunity to improve conditions for both development and highway safety by applying current policies, higher standards of design / guidance's, build and safety to new developments, and not to retain and/or continue with past obsolete standards.

Both Hertfordshire County Council (HCC) and national policies place strong emphasis on the importance of accessibility to bus services, in planning policy.

UK planning and transport policies have increasingly emphasised the importance of public transport accessibility as a means to reduce car dependency, meet emissions targets, and improve public health and safety. Here are some key developments:

Inclusive Transport Strategy (2020–2024)

The UK Government's Inclusive Transport Strategy aimed to ensure that transport systems are accessible to all, particularly disabled people. The 2025 evaluation of this strategy highlighted: A need for stronger integration of accessibility in planning and design. Emphasis on reducing barriers to travel, especially for disabled and older people. Recommendations for future policies to embed accessibility as a core requirement in development planning.

National Centre for Accessible Transport (NCAT) Strategy (2025–2027)

NCAT's strategy focuses on:

Evidence-based planning to close the transport accessibility gap.

Promoting human-centred design in transport systems.

Highlighting that 92% of disabled people face barriers when using at least one mode of transport, which affects journey frequency and duration.

Parliamentary Commitments

Recent debates in Parliament reaffirm the goal of making accessibility standard across the transport network, with particular attention to safety and inclusivity for all users.

The NPPF (2023) states:

“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.” (NPPF, Paragraph 105)

“Planning policies should support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.” (NPPF, Paragraph 106)

“Planning policies and decisions should ensure that developments:

- give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas;
- have access to high quality public transport facilities.” (NPPF, Paragraph 112)

Hertfordshire’s LTP4 and Accessibility Strategy reinforce these principles:

- LTP4 Objective: “Deliver a transport system that provides access for all and supports economic growth.”
- Accessibility Strategy: Emphasises the need for residents to be within reasonable walking distance of key services, including bus stops.

While there is no absolute national standard, HCC use 400m (depending on highway conditions 600m if no gradients/hills etc) as a reasonable walking distance to a bus stop. The nearest bus stop distance measured for the furthest dwelling (not centre of the site) is approx. 1km, this distance is considered beyond acceptable thresholds, especially for:

- Older adults
- People with disabilities
- Families with young children

In contrast the applicant feels that funding improved bus service is not feasible:

- There is no requirement to route a bus into the proposed site, nor would the scale of development justify this.
- The proposed development would not be of a scale to necessitate to support a new service or reroute an additional service.

A development where the furthest dwelling is around 1km from a bus stop is contrary with all the above listed policies, therefore considered unsustainable in both transport and policies terms leading to the HA to recommend refusal. However, the HA would review its decision if the applicant identified and funded robust mitigating measures such as improving accessibility to bus services (this would be required to be in place prior to occupation of development).

In the TA it also states that “The development would be supportive of improvements to footway infrastructure” and “Some improvements to the footways, such as tactile paving and dropped kerbs would be supportive of the walking route to the bus station.”, however nothing has been identified, and no robust study has been undertaken to commit to implementing the measures.

The Highway Authority will require a pedestrian/cyclist audit to be undertaken to key destinations identifying whether any deficiencies that create barriers to vulnerable road users currently exist and submit proposals/measures to rectify such barriers along key desire lines and improve linkages including in and around public transport. Any improvements identified in the audit (dropped kerbs, tactile paving, pedestrian crossings, cycling, etc) will be required to be delivered under a S278 agreement, to ensure that the surrounding infrastructure, such as roads, cycleways, footways and footpaths, can handle the changes brought by the proposed development, in accordance with the relevant policies and guidance’s in supporting sustainable travel.

Site topography

The application site presents significant topographical challenges, which extend to the proposed access road. These challenges raise doubts about the feasibility of constructing the access road, a matter that was not addressed in the TA. The level differences across the site, combined with the physical constraints associated with the design and construction of the access road, raise serious concerns for the HA regarding the deliverability of the development.

At the outline planning stage, HCC requires that main access roads must not exceed a gradient of 1 in 20 (5%). This is to ensure safe and inclusive access for all users, including pedestrians, cyclists, and mobility-impaired individuals. This requirement aligns with the Place and Movement Planning and Design Guide (P&MPDG), NPPF para's 110 and 112 and Manual for Streets 2 (MfS2), which prioritise accessibility and safety in highway design.

To enable a full assessment, the following information is required from the applicant:

- An explanation of how the site's steep gradients may affect vehicular access, road safety, or pedestrian movement.
- Engineering feasibility evidence to demonstrate that the proposed access road can be safely and practically constructed given the site's topography.
- Confirmation that the proposed access arrangements comply with P&MPDG, MfS2 and the NPPF at this outline application stage, to ensure it does not compromise safety and accessibility.
- Assurance that the access road including internal roads are either level with the public highway or have a gradient not exceeding 5%, to ensure accessibility for mobility-impaired users, pedestrians, and cyclists.
- propose any mitigation strategies to address the challenges posed by the site's topography.

Planning Obligations

It is Hertfordshire County Councils policy to seek a planning obligation in respect of Sustainable Transport including for all developments. The revised NPPF -July 2021 promotes accessibility by sustainable means including bus, cycling, and walking, and the provisions of S106 of the Town and Country Planning Act-1990 allows that planning obligations, governed by the guidance within CIL Regulations may be used to mitigate the impact of development. HCC adopted a new toolkit to seek planning obligations towards sustainable transport. Full details on HCC's policy towards planning obligations may be found at the following web address

<https://www.hertfordshire.gov.uk/about-the-council/freedom-of-information-and-council-data/open-data-data-statistics-about-hertfordshire/who-we-are-and-what-we-do/property/planning-obligations-guidance.aspx#developercontributions>

Based on the above, the county council will actively seek planning obligations which will improve sustainable transport facilities and services for passenger transport users who are using the development and generally for those users in the surrounding area. The headline figure as stated in our Toolkit is £9,861 per dwelling (i.e., the average amount each new dwelling across the county needs to pay in order for the necessary new infrastructure to be delivered). Multiply this by 84 dwellings = £828,324 (index linked by SPONS to March 2024).

Travel plan

The Sustainable Mobility Officer of the Active & Safer Travel Team has reviewed the document, the summary of their comments listed below:

- An interim TPC must be appointed and contact details shared with HCC.
- A secondary contact to the TPC will be communicated to HCC, once the TPC is appointed.
- Detail on where TPC is based are required (on-site/off-site)

- Residential travel pack contributions are required to be provided for residents at the value of £50 per flat and £100 per house (e.g. bus vouchers or vouchers towards active travel).
- Statement from the developers/business stating that they are commitment to implementing the travel plan
- A target 5% reduction in car-based trips is mentioned, HCC require a minimum of 10%
- HCC hold a licence with Modeshift STARS – a travel plan accreditation platform (DfT approved). Modeshift STARS offers a platform to build a travel plan and manage it, awarding developments for their efforts to encourage sustainable modes of travel. Prior to occupation, the travel plan coordinator should attend a meeting with an HCC officer for an introduction and set up to the platform.

Recommendation

Until appropriate measures are proposed to ensure that all dwellings are within a reasonable walking distance of a bus stop, with safe and accessible gradients, the HA is unable to support the application due to its failure to demonstrate a satisfactory, policy-led and design-led approach to accessibility, contrary to:

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Signed

Senober Khan

10 September 2025