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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: 25/01947/FP
HCC ref: NH/26213/2025
HCC received: 27 August 2025
Area manager: Manjinder Sehmi
Case officer: Shamsul Huda

Location

Land South Of A507 Near Cumberlow Green, Clothall Road, Clothall, Hertfordshire

Application type

Full Application

Proposal

Full Planning Permission : Battery Energy Storage System (BESS), ground mounted solar farm, associated infrastructure, access and landscaping

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:

1. The application lacks sufficient information to correctly assess the highway matters for the site to ensure that it meets standards and is acceptable and safe. This therefore means that it has the potential to conflict with policies stipulated in Hertfordshire County Councils Local Transport Plan (LTP4 2018) (Ref- Policy- 5 a, b, c, d & f, Policy -9a, Policy -16 g, Policy-17b) and the National Planning Policy Framework (NPPF, 2024) (Ref-Policies 115 b and 116).

COMMENTS:

The proposal is for the installation and operation of a solar farm including co-located energy storage facilities, onsite substation, ancillary infrastructure and landscaping on Land To The West Of The A507 near Cumberlow Green, Clothall Road, Clothall. The HCC Highways at this stage would like to recommend refusal for the site owing to a lack of information regarding Road Safety Audit report, Access arrangement, Highway Safety at the junction of Cromer Heath with A507 which has the potential to cause conflict on the highway network without additional information provided.

Policy Review:

Key policy documents used to assess the application are

- National Planning Policy Framework (Dec 2024)
- National Planning Practice Guidance. (2014)
- Hertfordshire Local Transport Plan 2011-2031
- HCC's Place & Movement Planning Design Guidance adopted in March 2024
- NHDC Local Plan 2011-2031

Vehicular Access Points:**Primary Access Point:**

The Highway Authority acknowledges that all proposed access points are currently existing and used solely for field access. However, the proposed development will significantly intensify the use of these access points.

The access arrangements—both Primary and Secondary, as shown on Drawing Ref: Dr-L-1002-P09—are considered suboptimal in terms of location and potential vehicular conflict. Specifically, the Eastern site access, as illustrated in Drawing Ref: AMA-230104-SK-001-3.4 / AMA-23064-SK-001-P05, fails to adequately address priority movements at the junction of Cromer Heath and the A507, and does not provide sufficient detail on how vehicular conflicts will be managed.

Key concerns include:

- Vehicles entering the site from the East may conflict with vehicles exiting Cromer Heath.
- Vehicles turning into the site from the West may conflict with vehicles approaching from both the East and Cromer Heath.

The applicant is advised to revisit the access design to address these concerns, particularly in relation to junction priority and conflict mitigation.

Secondary Access Point:

The secondary access point, as shown on drawings Ref: AMA-23104-SK-001-2.4 and AMA-23064-SK-001, P05, is considered substandard due to its location, visibility, and turning provision.

The applicant is advised to resubmit revised access arrangements for both the primary and secondary access points in accordance with Hertfordshire County Council's Place and Movement Planning Design Guidance (P&MPDG, March 2024).

Specifically, the guidance (Part 3, Chapter 2, Paragraph 7 and Chapter 9) states that a simple T-junction is acceptable, with a bell-mouth kerb radius of 4 metres (maximum 6 metres) where a crossover is deemed unsuitable.

Tracking:

The submitted tracking diagrams indicate that vehicles are overrunning the kerblines, green verges, and the opposite lane. This raises concerns regarding the adequacy of the junction design.

The dimensions and layout of the junction must accommodate the swept path of all vehicles likely to use the site, including emergency services and refuse collection vehicles. For reference, the standard FTA vehicle dimensions are:

- Length: 16.480m
- Width: 2.550m
- Body Height: 3.870m

The applicant is therefore advised to revise the junction layout to ensure compliance with Hertfordshire County Council's Place and Movement Planning Design Guidance (P&MPDG, March

2024). Specifically, the design should reflect the standards outlined in Part 3, Chapter 2, Paragraph 7 and Chapter 9, which recommend a simple T-junction with a bell-mouth kerb radius of 4 metres (maximum 6 metres) where a crossover is unsuitable.

Visibility:

It appears that the visibility splays for both the primary and secondary access points encroach onto third-party land. Based on the current Place and Movement Planning Design Guidance (P&MPDG, March 2024) and the prevailing speed limit, visibility should be provided in accordance with Design Manual for Roads and Bridges (DMRB) standards.

All access points must be designed in line with P&MPDG requirements, with a minimum Y-distance of 4.5 metres to ensure safe and adequate visibility for vehicles entering and exiting the site.

The applicant is advised to revise the access arrangements accordingly and demonstrate that the required visibility splays can be achieved within land under their control or secured by agreement.

Stage1 Road Safety Audit (RSA):

No Stage 1 Road Safety Audit (RSA) report has been submitted in support of the proposed access points.

The applicant is advised to submit a Stage 1 RSA for all proposed access arrangements to demonstrate that the access points are safe and viable for the development. This is a key requirement to ensure compliance with Hertfordshire County Council's Place and Movement Planning Design Guidance (P&MPDG, March 2024) and to support the overall safety and functionality of the highway network.

Delivery and Service Plan:

The submitted Transport Statement (TS) does not include a robust Delivery and Servicing Plan for the proposed development.

The Highway Authority considers that, over time, the development will require regular deliveries and servicing. Therefore, a comprehensive Delivery and Servicing Plan must be submitted to demonstrate how such activities will be safely and efficiently managed without adversely impacting the highway network or surrounding area.

Construction Traffic Management Plan:

A Construction Traffic Management Plan (CTMP), Ref: AMA23064, has been submitted in support of the application.

Trip Generation (TS – Para 3.1.4):

The Transport Statement indicates a high number of cumulative peak HGV movements associated with the proposed development. This level of activity may significantly impact daily traffic flow on the A507. The applicant is advised to reduce HGV movements, particularly during AM and PM peak periods, to mitigate potential congestion and safety concerns.

A507 Narrow Section (Near Cottered):

There is a known narrow section along the A507 near Cottered, where the Highway Authority is concerned about the ability of two HGVs to pass safely. Additionally, school buses operate along this route. The applicant should consider appropriate mitigation measures for this section, such as temporary traffic management or passing bays.

Temporary Highway Signage (TS – Para 3.3.8):

The Transport Statement references temporary highway signage but does not provide any details. The applicant is advised to submit a detailed plan showing the location, type, and design of all proposed temporary highway signs to ensure safety and compliance with relevant standards.

Vehicle Routing:

The proposed haulage route must avoid the low bridge at Baldock, which is unsuitable for HGVs. Therefore, all construction and delivery vehicles should route via the A10 to the east, ensuring safe and viable access to and from the site.

The applicant is advised to update the Construction Traffic Management Plan to reflect this routing requirement and demonstrate how vehicle movements will be managed to avoid restricted infrastructure.

Conclusion:

In summary, the current planning application raises several significant highway safety concerns, particularly relating to the location and design of the proposed site access points. The access arrangements are considered substandard due to poor visibility, inappropriate siting, and inadequate provision for safe entry and exit, which is contrary to the policies set out in Local Transport Plan 4 (LTP4) and the National Planning Policy Framework (NPPF), as referenced earlier in this report.

Therefore, based on the current submission, the Highway Authority has no option but to recommend refusal of the application at this stage.

However, should the applicant satisfactorily address the identified highway concerns—particularly those relating to the main site access and the impact on the free flow of traffic along the A507—the Highway Authority would be willing to reconsider its position.

Signed

Shamsul Huda

26 September 2025