

Application 25/02092/FP (45 Bury Mead Road)

Comments on parking and sustainable travel

Abbreviations used

HGV: Heavy Goods Vehicle (typically defined as over 3.5 tonnes)
HRNA: Highways Response Note Addendum (24 March 2026)
NPPF: National Planning Policy Framework (December 2024)
TS: Transport Statement (August 2025)

1 On-site parking

- 1.1 The updated ground floor plan (PL-600-B Revision C) shows nine parking bays, including one disabled bay and one reserved exclusively for the mortuary van.
- 1.2 This is more realistic than the plan initially submitted (Revision A), but access along the west side of the building remains tight, with a wall and a fence on each side, unlike on a typical 5m-wide road.
- 1.3 The tracking diagrams do not show how cars will:
 - a. enter bays 4 to 6 from the west and bay 9 from the south, which will allow drivers to park close to the wall and still exit from the driver-side door;
 - b. turn around behind the mosque when bays 7, 8 and 9 are occupied.
 - c. manoeuvre in and out when the mortuary bay is occupied (HRNA states at §4.2.5, "When the mortuary area is in use, the car parking bays will be managed appropriately to accommodate access," which implies that other vehicles may be parking or parked on site when the mortuary van is occupying bay 6).
- 1.4 **In summary, the applicant has not provided sufficient information to demonstrate that the proposed parking arrangements are practical and safe under all reasonable usage scenarios.**

2 Off-site parking capacity

- 2.1 The Parking Beat Survey methodology reported in section 6 of the TS does not identify the exact locations deemed suitable for parking, nor what mix of vehicle sizes it has assumed may be parked. It is therefore not possible to verify the calculated parking capacities.
- 2.2 **Nevertheless, the calculated maximum capacities reported in TS Table 6.1 appear to be overstated:**
 - 2.2.1 For instance, for Bury Mead Road, the maximum capacity given in TS Table 6.1 is 163 vehicles. The road is approximately 465 metres from the end of the double yellow lines outside no. 7 to the modal filters at the northern end. It is only wide enough to accommodate parking on one side of the road. Even ignoring the constraints of accessways, 163 vehicles would have just 2.85 metres each, which is not credible. For reference, most cars are between 3.6 and 4.8 metres long, and

typically require parallel parking bays of 5.5 to 6 metres long. Assuming a more realistic average space of 6m per vehicle (including vans and lorries), the capacity would be less than 77 vehicles.

- 2.2.2 Included are areas of private land at Shepherds Mead, The Mead and Platinum Court (see Figures 1 and 2), which should not be counted as being available to the general public. Even if parking on this land is not currently controlled, the landowners or management companies could restrict access or engage private parking enforcement in future.



Figure 1: Extract from TS Figure 6.1, showing the scope of the parking beat survey

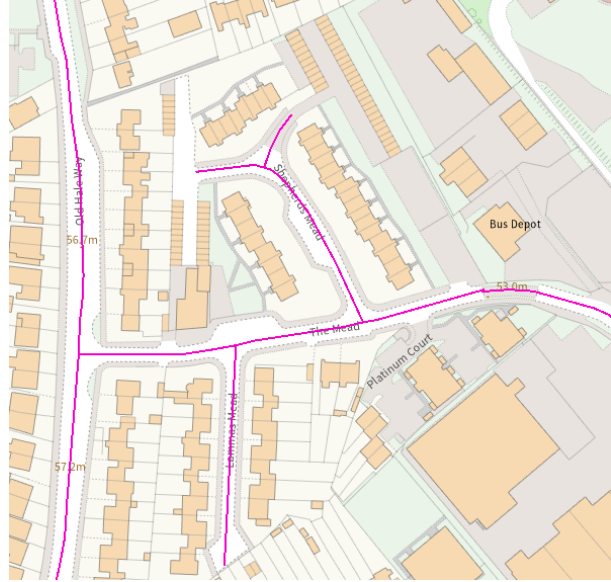


Figure 2: Extract from the Hertfordshire Highways Gazetteer, showing (in pink) which roads are adopted public highway

- 2.3 The 500m walking distance used to circumscribe the parking survey is possibly based on the Lambeth guidance for commercial sites. The applicant has not provided any evidence to support this being realistic for people visiting a place of worship.
- 2.4 Although the applicant expects peak parking demand to be at Friday lunchtimes, the Highway Authority's response of 13 November 2025 points out that there will be demand for parking during prayer times all week and in the evenings, and demand will be higher than normal during Ramadan and religious festivals such as Eid. The applicant has not provided any information about how much of this demand will result in parking on street, other than on Fridays.
- 2.5 **In summary, it appears the applicant has significantly overestimated parking availability, and therefore underestimated parking stress when congregants attend the proposed mosque.**

3 Off-site parking demand

- 3.1 The forecast set out in HRNA Table 7.3 assumes that approximately 4% of congregants will switch from walking to travelling as a car passenger, with no increase in the number of people travelling as a car driver. According to §7.3.13, "This reflects the altered walking catchment, with fewer attendees within very short walking distance of 6-mins (<500m), but a greater proportion within the moderate walking distance band 12.5-25-mins (1-2km)".

- 3.2 That assumption appears to imply that some people who currently walk will car-share with non-family members rather than drive themselves. The applicant has provided no evidence that this will be the case.
- 3.3 The Highway Authority's response of 13 November 2025 asserted, "The existing Florence Street site benefits from a Controlled Parking Zone (CPZ), which regulates kerbside activity and limits congestion. Bury Mead Road has no parking controls, meaning unmanaged kerbside parking will occur, creating safety hazards and obstructing HGV movements. The absence of restrictions will encourage car use, not replicate CPZ behaviour."
- 3.4 The applicant has not adequately addressed this point:
 - 3.4.1 Its central forecast still assumes a 13% mode share for driving, which is based on travel to the existing site.
 - 3.4.2 The alternative estimate of a 20.6% mode share is, by the applicant's own admission, based on flawed data (HRNA §8.1.3: "the travel survey ... did not clearly distinguish between drivers and passengers"), and therefore its relevance is questionable.
 - 3.4.3 The choice of 39% driving mode-share for the sensitivity test is not explained, nor is any justification provided for why the applicant believes this scenario to be "very unlikely" (HRNA §8.2.4).
- 3.5 The central estimate set out in Table 8.1 of the HRNA is that 20 cars would require off-site parking at times of peak mosque attendance. The Highway Authority has questioned how realistic this is, especially in the absence of parking controls to inhibit travel by car. In response, the applicant has sensitivity-tested a car mode share of 39%, which would generate an additional parking demand of 82 cars.
- 3.6 **Even if the 39% mode share for driving is accepted as a reasonable upper bound, the unreliability of the Parking Beat Survey (covered in the previous section) means the local authorities cannot be confident that 82 cars can be accommodated safely in locations where drivers are most likely to seek to park.**

4 Off-site parking safety

4.1 Obstruction

- 4.1.1 Vehicles currently park on the footway and verges along Bury Mead Road. Although a single snapshot, this can be seen in the Google Street View images of August 2024.
- 4.1.2 The additional demand for parking from congregants at the mosque would significantly increase occurrences of cars stopping or parking on footways and verges to avoid obstructing HGVs from travelling along the road. These cars may impede people walking to and from the mosque, potentially forcing some of them to walk in the road.
- 4.1.3 Because The Mead, Old Hale Way and adjoining streets are not accessible from Bury Mead Road, someone who fails to find a parking space on the latter will have to drive back out and around (a total distance of around 2.5km if they drive to the end of Bury Mead Road and back first). The inconvenience and additional time required are likely to lead some people to park unsafely or obstructively.

4.2 Manoeuvring hazard

- 4.2.1 As Bury Mead Road is not a through-road (there are bollards at the northern end), vehicles entering the road must turn around. There is no turning head at the end of the road, so vehicles must use site accesses instead. This creates additional potential conflicts with people walking.
- 4.2.2 The additional demand for parking from congregants at the mosque would also increase the number of reversing manoeuvres on Bury Mead Road.
- 4.2.3 No checks on parking or enforcement are likely to be carried out, as explained in more detail below.

4.3 Dooring hazard

- 4.3.1 People getting in and out of parked cars create a hazard to people cycling, as car occupants rarely check for cyclists coming from behind before opening their door.

4.4 Conclusion on parking safety

- 4.4.1 If there is a significant increase in the number of car movements and of obstructive or otherwise unsafe parking on Bury Mead Road (and the applicant has not provided compelling evidence to suggest this would not be the case), it would have a severe impact on the movement of other vehicles and the safe movement of pedestrians. I therefore agree with the Highway Authority's position that this site falls within the scope of paragraph 116 of the NPPF:

Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

- 4.4.2 **In summary, the applicant has not adequately addressed the safety implications of there being no parking controls on Bury Mead Road such that the Highway Authority's objection, in particular in relation to the NPPF test, could be overcome.**

5 Parking controls

- 5.1 It may be of assistance if I provide some further background and detail on management of on-street parking, and why the applicant cannot rely on new parking controls to make the application acceptable in transport terms.
- 5.2 North Herts Council is the Parking Authority by virtue of civil enforcement powers delegated from the Highway Authority through an agency agreement.
- 5.3 As the parking authority, North Herts Council can currently only enforce against parking on footways and verges where there is a correctly implemented Traffic Regulation Order, e.g. with single or double yellow lines painted on the carriageway. Although the Council has powers to make such a TRO for Bury Mead Road, it is Council policy that parking TROs are made only with the support of local residents and businesses.
- 5.4 Businesses along Bury Mead Road may be unlikely to support a TRO that reduces the availability of parking because their staff rely on being able to park on the road, and because large vehicles entering their sites, in particular the scrap metal processor opposite the applicant's site, frequently have to wait in the road until there is space to enter. This too can be seen in Google Street View, where a lorry is parked (driver absent) in front of 27 Bury Mead Road.

- 5.5 A TRO to remove parking from the west side of Bury Mead Road may also face opposition from the Highway Authority on safety grounds, as it may lead to increased vehicle speeds. Therefore, traffic calming measures may also be required. The applicant has not proposed this.
- 5.6 It is not within the applicant's gift to make a TRO. Even if it were to agree to a planning obligation to pay the parking authority to make a TRO restricting parking on, say, one side of Bury Mead Road, it could not be confident, still less certain, that it would be made. For this reason, the planning authority could not make this a negative pre-commencement *condition* as it would fail the enforceability test of NPPF paragraph 57.
- 5.7 The Local Authorities have limited powers to make orders preventing parking on footways and verges, but there is no precedent for doing this in North Hertfordshire. The English Devolution and Community Empowerment Act 2026 will provide new powers in this area, but the relevant regulations are not yet in force.
- 5.8 As the Highways Authority's responses make clear, voluntary measures to manage parking are not an acceptable alternative mitigation.
- 5.9 There is a further concern about additional costs that would be imposed on the Highway Authority to maintain and protect the verges, which could see significant damage from vehicles, especially during wetter months.
- 5.10 An approach that addresses both the safety and maintenance concerns would be to install bollards or other obstacles along the footways and verges to physically prevent parking. An example exists outside 7 Bury Mead Road. As the road is an adopted highway, this would require the agreement of the Highway Authority. In any case, the applicant has not proposed this.
- 5.11 If planning permission were to be granted, physical measures to prevent parking on footways and verges are likely to be needed.
- 5.12 In summary, neither the applicant nor the LPA can rely upon a parking TRO to mitigate the potential hazards resulting from the demand for on-street parking associated with the development. The applicant has not proposed or agreed with the Highway Authority an acceptable alternative mitigation plan.**

6 Sustainable travel

6.1 Active travel safety

- 6.1.1 The five-day flow survey reported in HRNA Table 6.1 shows there is an average of 29 HGV movements between 12:00 and 13:00 and 27 between 13:00 and 14:00. Not only are these vehicles travelling along Bury Mead Road, all turn in and out of sites along the road, many crossing the (only) footway along Bury Mead Road.
- 6.1.2 There is therefore a moderately high likelihood that anyone walking or cycling to or from the mosque for early afternoon prayers¹ will encounter an HGV. The more people who walk or cycle to the mosque, the greater the likelihood of conflict with HGV movements.
- 6.1.3 Most lorries and vans have blind spots in their rear-view mirrors and many do not have rear-view cameras. This means that people's safety is reliant on their being

¹ According to the Hitchin Jaami' Masjid web site, prayer times are 12:45 and 13:30 in winter, and 13:30 and 14:15 in summer. Source: <https://hitchinmosque.org/> (checked 20 May 2026)

alert to the hazards. In a public street (as opposed to a site where staff are trained in Health & Safety rules and practices), this cannot reasonably be assumed.

6.2 Bus travel attractiveness

- 6.2.1 The summary of bus services provided in TS Table 3.1 (and not updated in the HRNA) is about to become out of date. As of 31 May 2026, the 9A service, which calls at the stops on Old Hale Way, will reduce to running every two hours on weekdays.²

Southbound:

Hitchin, opp Strathmore School | 05:43 07:43 09:43 11:43 13:43 15:51 17:51 19:43

Northbound:

Hitchin, nr Strathmore School | 05:56 07:56 10:01 12:01 14:01 16:01 18:06 20:06

- 6.2.2 As confirmed in HRNA sections 5.7 and 5.8, none of the bus stops has a shelter. The combination of infrequent services and no protection from the elements makes bus travel from the site even more unattractive than bus travel to the site.

6.3 Mode shares

- 6.3.1 The applicant's evidence suggests that a negligible proportion of people will travel by bus, train or cycle to a mosque at this site. The survey of the travel intentions of 39 congregants, reported at HRNA §7.2.4, shows that none intended to travel there by bus or cycle. The travel survey reported in HRNA Appendix F shows that nobody travelled by bus, train or cycle to the existing Jaami' Masjid & Islamic Centre. The travel survey reported in TS Appendix D shows that nobody travelled by bus or train, and only one person by cycle.
- 6.3.2 For reasons set out above in §6.1 and §6.2, there are no strong reasons to think that this will change significantly.
- 6.3.3 Therefore, the relevant modal choices for people travelling to a mosque at this site will be between walking, driving or being driven.

6.4 Sustainability of location in transport terms

- 6.4.1 The applicant claims at TS §7.1.1, "This site is in a sustainable location, due to its accessibility by public transport and its integration with existing walking and cycling infrastructure." The Highway Authority has questioned this, and the points set out above show why this site is not a sustainable location for use as a place of worship at times when the industrial sites on the same road are open.

7 Summary

- 7.1 The on-site parking arrangements do not appear to be practical and safe.
- 7.2 The off-site parking capacity appears to have been significantly overestimated.
- 7.3 The off-site parking demand lacks robust evidence and forecasting.
- 7.4 Off-site parking safety is a very serious concern that engages NPPF paragraph 116.
- 7.5 The applicant has not proposed or agreed acceptable mitigation measures to address the safety concerns.
- 7.6 In view of all the above, it is not possible to conclude that the site is a sustainable location in transport terms for the intended use.

² [9A - Bedford - Hitchin - Stevenage – Stagecoach East – Bus Times](#)