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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: 25/01196/FP
HCC ref: NH/25052/2025
HCC received: 13 November 2025
Area manager: James Dale
Case officer: Adrian McHale

Location

STARWOOD HOUSE AVENUE ONE LETCHWORTH GARDEN CITY SG6 2HB

Application type

Full Application

Proposal

AMENDED PROPOSAL

Erection of two buildings including three units for Flexible Use Classes including Eg (ii) (iii), B2, B8, including servicing, parking, access, 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 does not wish to restrict the grant of permission subject to a Strand 2 contribution of £37,943 and the following conditions:

CONDITIONS

1) No development shall commence until full details (in the form of scaled plans and / or written specifications) have been submitted to and approved in writing by the Local Planning Authority to illustrate the following:

- i) Roads, footways.
- ii) Cycleways.
- iii) Foul and surface water drainage.
- iv) Visibility splays
- v) Access arrangements
- vi) Parking provision in accordance with adopted standard.

- vii) Loading areas.
- viii) Turning areas.

Reason: To ensure suitable, safe and satisfactory planning and development of the site in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

2) Existing Access – Improved

Prior to the first occupation / use hereby permitted the vehicular access improvements, as indicated on drawing numbers (KMC25034 / 005 (GA) Rev - or KMC25034 / 004 (GA) Rev C), shall be completed and thereafter retained in accordance with details/specifications to be submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority.

Reason: To ensure construction of a satisfactory access and in the interests of highway safety, traffic movement and amenity in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

3) Electric Vehicle (EV) Charging Points as % of total car parking spaces

Prior to the first occupation / use of the development hereby permitted, provision shall be made for 20% of the car parking spaces (20 spaces) to have active provision for EV charging and the remaining 80% of the car parking spaces to have passive provision for EV charging.

Reason: To ensure construction of a satisfactory development and to promote sustainable development in accordance with Policies 5, 19 and 20 of Hertfordshire's Local Transport Plan (adopted 2018).

4) Construction Management Plan

No development shall commence until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the construction of the development shall only be carried out in accordance with the approved Plan: The Construction Management Plan shall include details of:

- a. Construction vehicle numbers, type, routing;
- b. Access arrangements to the site;
- c. Traffic management requirements
- d. Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas);
- e. Siting and details of wheel washing facilities;
- f. Cleaning of site entrances, site tracks and the adjacent public highway;
- g. Timing of construction activities (including delivery times and removal of waste) and to avoid school pick up/drop off times;
- h. Provision of sufficient on-site parking prior to commencement of construction activities;
- i. Post construction restoration/reinstatement of the working areas and temporary access to the public highway;
- j. where works cannot be contained wholly within the site a plan should be submitted showing the site layout on the highway including extent of hoarding, pedestrian routes and remaining road width for vehicle movements;
- k. Phasing Plan.

Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way in accordance with Policies 5, 12, 17 and 22 of Hertfordshire's Local Transport Plan (adopted 2018).

5) Travel Plan – Requested Prior to Use

At least 3 months prior to the first occupation / use of the approved development a detailed Travel Plan for the site shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highways Authority. The approved Travel Plan Statement shall be implemented in accordance with the timetable and target contained therein and shall continue to be implemented as long as any part of the development is occupied subject to approved modifications agreed by the Local Planning Authority in consultation with the Highway Authority as part of the annual review.

Reason: To ensure that sustainable travel options associated with the development are promoted and maximised to be in accordance with Policies 3, 5, 7, 8, 9 and 10 of Hertfordshire's Local Transport Plan (adopted 2018).

APPROPRIATE INFORMATIVES

HCC as Highway Authority recommends inclusion of the following Advisory Note (AN) / highway informative to ensure that any works within the highway are carried out in accordance with the provisions of the Highway Act 1980:

AN1) Extent of Highway: Information on obtaining the extent of public highway around the site can be obtained from the HCC website:

www.hertfordshire.gov.uk/services/highways-roads-and-pavements/changes-to-your-road/extent-of-highways.aspx

AN2) Storage of materials: The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence.

Further information is available via the County Council website at:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/business-licences/business-licences.aspx> or by telephoning 0300 1234047.

AN3) Obstruction of highway: It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence. Further information is available via the County Council website at:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/business-licences/business-licences.aspx> or by telephoning 0300 1234047.

AN4) Debris and deposits on the highway: It is an offence under section 148 of the Highways Act 1980 to deposit compost, dung or other material for dressing land, or any rubbish on a made up carriageway, or any or other debris on a highway to the interruption of any highway user. Section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure that all vehicles leaving the site during construction of the development and use thereafter are in a condition such as not to emit dust or deposit mud, slurry or other debris on the highway. Further information is available by telephoning 0300 1234047.

AN5) Works within the highway (section 278): The applicant is advised that in order to comply with this permission it will be necessary for the developer of the site to enter into an agreement with

Hertfordshire County Council as Highway Authority under Section 278 of the Highways Act 1980 to ensure the satisfactory completion of the access and associated road improvements. The construction of such works must be undertaken to the satisfaction and specification of the Highway Authority, and by a contractor who is authorised to work in the public highway. Before works commence the applicant will need to apply to the Highway Authority to obtain their permission and requirements. Further information is available via the County Council website at: <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx> or by telephoning 0300 1234047.

AN6) Construction Management Plan (CMP): The purpose of the CMP is to help developers minimise construction impacts and relates to all construction activity both on and off site that impacts on the wider environment. It is intended to be a live document whereby different stages will be completed and submitted for application as the development progresses. A completed and signed CMP must address the way in which any impacts associated with the proposed works, and any cumulative impacts of other nearby construction sites will be mitigated and managed. The level of detail required in a CMP will depend on the scale and nature of development. The CMP would need to include elements of the Construction Logistics and Community Safety (CLOCS) standards as set out in our Construction Management template, a copy of which is available on the County Council's website at: <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>

AN7) Street works licence (New Roads and Street Works Act - Section 50): The applicant is advised that they are not authorised to carry out any work within the Public Highway and that to do so they will need to enter into a legal agreement with the Highway Authority (NRSW agreement). This consent is separate and additional to any planning permission that may be given. Before proceeding with the proposed development, the applicant shall obtain the requirements and permission for the associated placement of apparatus within the adjacent highway as part of the proposal via the County Council's website at: <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/permit-scheme/east-of-england-permit-scheme.aspx> or by telephoning 0300 1234 40047. This should be carried out prior to any new apparatus is placed within the highway.

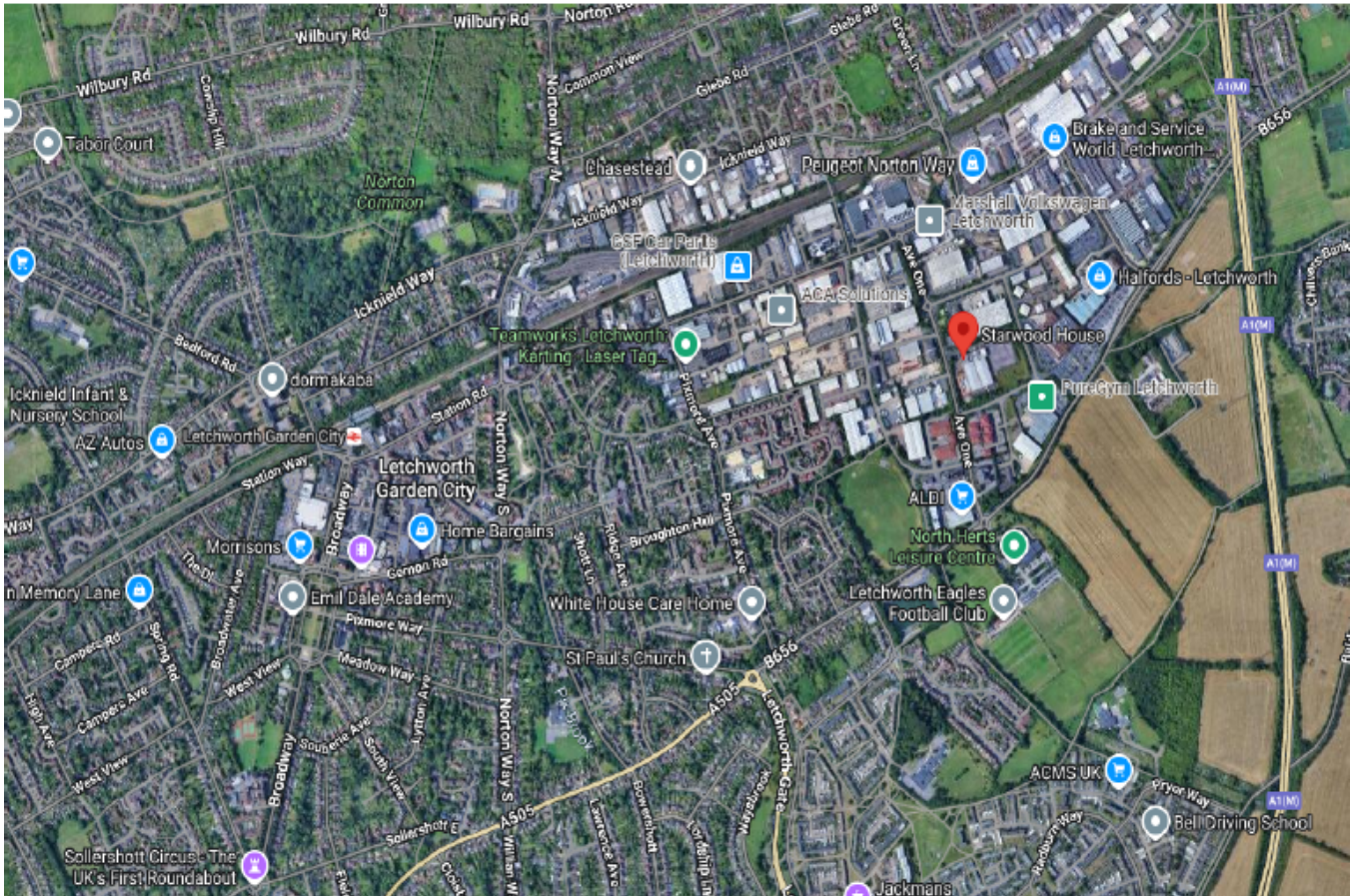
AN8) Abnormal loads and importation of construction equipment (i.e. large loads with: a width greater than 2.9m; rigid length of more than 18.65m or weight of 44,000kg - commonly applicable to cranes, piling machines etc.): The applicant is directed to ensure that operators conform to the provisions of The Road Vehicles (Authorisation of Special Types) (General) Order 2003 in ensuring that the Highway Authority is provided with notice of such movements, and that appropriate indemnity is offered to the Highway Authority. Further information is available via the Government website www.gov.uk/government/publications/abnormal-load-movements-application-and-notification-forms or by telephoning 0300 1234047.

AN9) Travel Plan (TP): A TP, in accordance with the provisions as laid out in Hertfordshire County Council's Travel Plan Guidance, would be required to be in place from the first occupation/use until 5 years post occupation/use. A £1,200 per annum (overall sum of £6000 and index-linked RPI March 2014) Evaluation and Support Fee would need to be secured via a Section 106 agreement towards supporting the implementation, processing and monitoring of the full travel plan including any engagement that may be needed. Further information is available via the County Council's website at: <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-i>

information/development-management/highways-development-management.aspx OR by emailing travelplans@hertfordshire.gov.uk

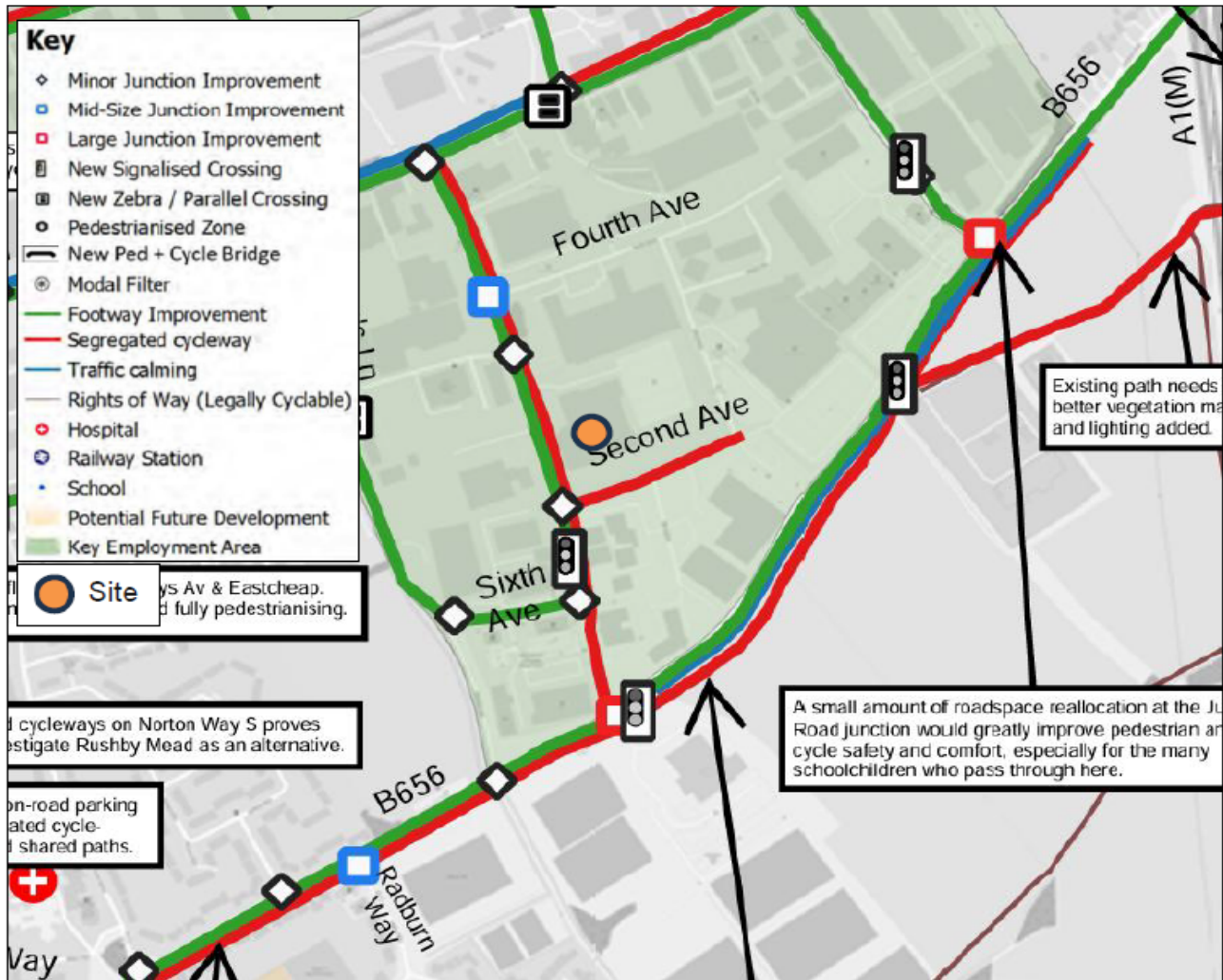
COMMENTS

1. Proposals have emerged to demolish the existing Starwood House (a vacant commercial building in an existing eastern industrial area) at Avenue One, Letchworth Garden City and erect in its place two buildings including three units for Flexible Use Classes including Eg (ii) (iii), B2, B8.

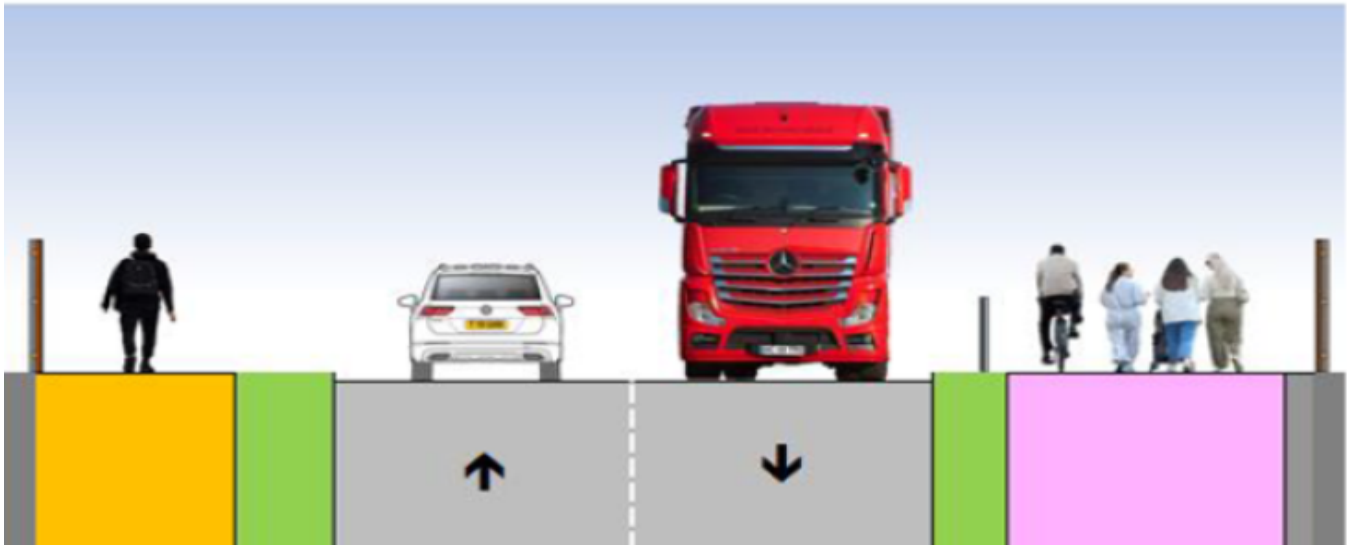


2. Sustainable Transport Access

- 2.1 In line with the Policies of LTP4, particularly Policies 1 (the Transport User Hierarchy) and 5 (Development Management), it is essential given the declared climate emergency that this is considered first to unlock a site sustainably.
- 2.2 The accessibility by foot and cycle of the existing industrial estate and thus Starwood House is considered reasonable, and HCC/ NHDC through the adopted Local Cycling and Walking Infrastructure Plan (LCWIP) have plans to improve this further. Public transport provision in the vicinity of the site is also considered good.
- 2.3 Subsequent to the proposed development coming forward the proposed route development has been fast tracked and it has been determined that the originally planned segregated cycle way proposed for Avenue One due to the space constraints and envisaged footfall, a 3m wide shared use facility enabled by a reduction in carriageway width to 6.5m is appropriate in this location.



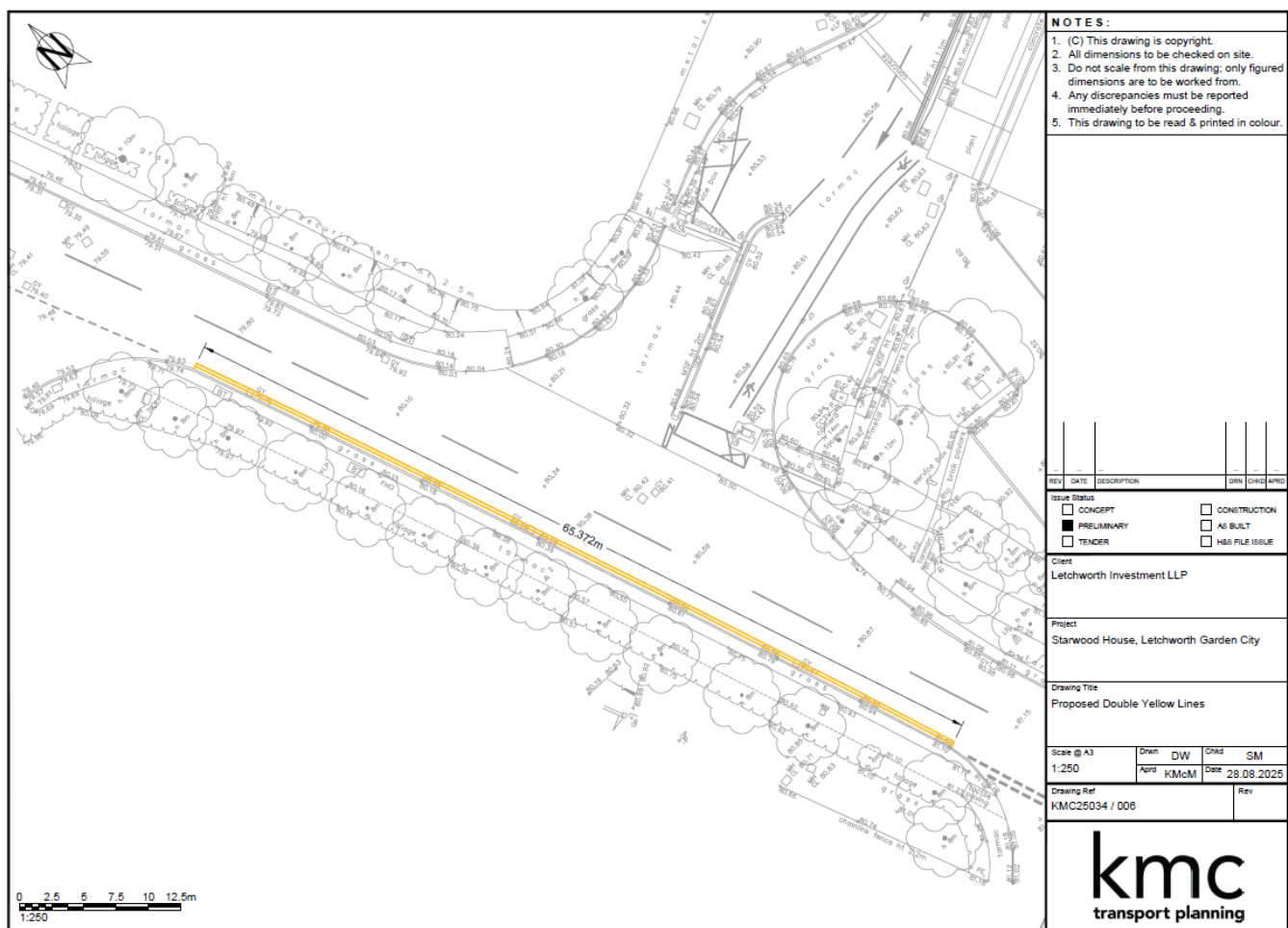
Footway	Verge	Carriageway lane	Carriageway lane	Verge	Shared use path	Buffer
2.10 m	1.00 m	3.25 m	3.25 m	0.70 m	3.00 m	0.20 m



2.4 The applicant has subsequently worked with HCC Highway to develop an vehicle access schemes which will facilitate the LCWIP proposals and not preclude them.



2.5 The HCC Highways favoured vehicle access scheme is shown by KMC25034 / 005 (GA) Rev - . This however, is reliant to a small degree on the removal of illegal car parking opposite the vehicle access. Whilst HCC Highways does not believe that drivers will continue to park illegally opposite the junction once it is live again. The applicant has only agreed to implement this layout, if the Traffic Regulation Order (TRO) shown on KMC25034 / 006 Rev - to implement parking restrictions (double yellow lines) is approved.



2.6 In the event the TRO is not approved the applicant intends to implement the vehicle access shown on KMC25034 / 004 (GA) Rev C. This layout will allow the applicant to operate HGV's via the vehicle access regardless of illegal parking or not.



2.7 Whilst this junction arrangement is not as compact for pedestrians as the preferred layout (KMC25034 / 005 (GA)), it does not preclude the LCWIP route proposals and is considered an improved layout to the existing Starwood House junction. Therefore, if the TRO which is currently being progressed is not approved HCC Highways accepts that this junction (KMC25034 / 004 (GA) Rev C) can be implemented by the applicant.

2.8 The applicant has also agreed a Strand 2 contribution of £37,943 (March 2024) to allow development and completion of the LCWIP scheme which will enhance the accessibility of the proposal site.

2.9 Internal Access Road/ Cycle Store Access

2.9.1 HCC Highways are unsure if the kerb is dropped appropriately to allow access from the access road to the internal cycle store, this matter may however be dealt with post any planning permission for the site.

2.10 Public Transport Access

2.10.1 HCC Highways considers the site is well placed for access by public transport (Bus and Rail) and if the preferred access is implemented the potential reduction in on-street car parking may improve the operation of the bus.

2.11 Travel Plan

2.11.1 It is noted that the applicant's transport consultant (KMC) has agreed with HCC that the outstanding issues HCC's Travel Plan team has identified can be dealt with by the appropriate planning condition. For the record these are:

Travel Plan Management

- Site-Wide Travel Plan Co-Ordinator contact details to be provided on appointment along with those of a secondary contact in case of personnel changes. Travel Plan Co-Ordinator details of individual land use Travel Plans should also be provided on appointment. Frequency on site and time allocated to the roles should be provided once known. The Travel Plan Co-Ordinators will be required to be in post until 5 years post first occupation.
- A statement of commitment to the robust implementation of the Travel Plan from a suitable member of senior management prior to occupation – this is to demonstrate senior level commitment to the effective implementation of the plan.

Measures

- Measures proposed are generally appropriate, however the Travel Plan appears to be aimed mainly at employees and visitors. Given the proposed land uses, delivery/servicing/business travel are likely to form a significant proportion of trips to the site and should also be the focus of the Travel Plan with appropriate measures included – within the Framework Plan these can be suggestions to be further tailored in the individual Travel Plans once eventual occupiers and the nature of the businesses on site are known.
- Promotion of HCC's Intalink website for bus information (<https://www.intalink.org.uk/>), HCC's cycling webpages (<https://www.hertfordshire.gov.uk/services/health-in-herts/keep-active/hertfordshire-cycling.aspx>), and Hertfordshire Health Walks (<https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/countryside-management/hertfordshire-health-walks/hertfordshire-health-walks.aspx>) should be included.

Targets, monitoring and action plan

- Census data illustrating potential mode split is included in the Transport Assessment, but not in the Travel Plan – inclusion is essential. Census data or data from TRICS used in the Transport Assessment should be used to develop interim mode shift targets for the duration of the Travel Plan. This gives an indication of the commitment to the achievement of significant but achievable mode shift which should be the primary objective of the Travel Plan. The interim targets can then be revised following results of baseline monitoring and as part of Travel Plan review. Table 5.4 and Table 5.5 in the Transport Assessment illustrates what level of cycle usage and car usage is possible with proposed levels of cycle and car parking provision, but this does not constitute mode shift targets we are looking for.
- 6.2.1 and 6.2.2 mention monitoring being a 'travel survey'. We require both multi-modal and questionnaire surveys for a site of this scale. Multi-modal surveys should be up to TRICS SAM standard or equivalent. This is to ensure adequate and good quality data is obtained which can be used to review the Travel Plan.

2.11.2 It should also be noted that an Evaluation and Support Fee of £1200 per year (for a 5 year plan) for each Full Travel Plan (index linked to RPI from May 2014) will be required.

3. Traffic Impact

3.1 KMC have investigated the vehicular impact of the additionally envisaged development over and above what was envisaged to have been attracted to the extant Starwood House at the locations that were agreed with HCC Highways in scoping.

- Avenue One / Works Road roundabout
- Avenue One / B656 Baldock Road roundabout

3.2 Avenue One / Works Road roundabout

3.2.1 The Avenue One / Works Road roundabout has been modelled in the transport industry standard ARCADY. The principal reference in an ARCADY model is the Ratio of Flow to Capacity (RFC) predicted on an individual approach to a junction. The operational threshold for an RFC is 0.85 and where RFC's are in excess of this cognisance of queuing is required; and a junction is only determined to be failing (over absolute capacity) where an RFC is in excess of 1.00.

3.2.2 In the absence of development traffic the Avenue One / Works Road roundabout in 2030 (2030 future baseline) the roundabout is predicted to be performing below its operational threshold with a AM peak maximum RFC of 0.70 on the Works Road East approach and a PM peak RFC of 0.82 on the Avenue One approach.

3.2.3 With the addition of development traffic in 2030 the impact on approaches is negligible and the aforementioned Works Road East and Avenue One approaches remain unaffected.

Arm	AM peak (0800-0900)			PM peak (1700-1800)		
	Queue (PCU)	Delay (s)	RFC	Queue (PCU)	Delay (s)	RFC
2025 base						
Works Road (E)	1.9	8.88	0.65	1.5	7.86	0.60
Avenue One	1.0	10.44	0.50	3.1	19.53	0.76
Works Road (W)	0.6	4.51	0.36	0.9	5.90	0.48
2030 future baseline						
Works Road (E)	2.3	10.29	0.70	1.8	8.80	0.64
Avenue One	1.2	11.51	0.54	4.2	25.59	0.82
Works Road (W)	0.7	4.74	0.38	1.1	6.43	0.51
2030 future baseline + forecast development traffic						
Works Road (E)	2.4	10.36	0.70	1.8	8.97	0.64
Avenue One	1.2	11.80	0.55	4.4	26.77	0.82
Works Road (W)	0.7	4.77	0.39	1.1	6.51	0.52

3.3 Avenue One / B656 Baldock Road roundabout

3.3.1 The Avenue One / B656 Baldock Road roundabout was also modelled within ARCADY and similarly showed that without development in the peaks of 2030 the approaches are operating below operational capacity. A maximum AM peak RFC of just 0.45 is predicted on the Western Baldock approach to the roundabout and a maximum PM peak RFC of 0.63 is predicted on the Avenue One approach.

3.3.2 The impact of development traffic in 2030 is again negligible at the Avenue One / B656 Baldock Road roundabout. The maximum AM peak RFC on the western Baldock Road approach remains unchanged at 0.45 and the maximum peak PM peak RFC on the Avenue One approach rises only slightly to 0.65.

Arm	AM peak (0800-0900)			PM peak (1700-1800)		
	Queue (PCU)	Delay (s)	RFC	Queue (PCU)	Delay (s)	RFC
2025 Base						
B656 (E)	0.3	3.06	0.25	0.5	3.74	0.31
Leisure centre access	0.1	5.39	0.07	0.3	7.59	0.23
B656 (W)	0.7	3.21	0.42	0.7	3.2	0.42
Avenue One	0.5	3.9	0.31	1.4	6.31	0.59
2030 future baseline						
B656 (E)	0.4	3.16	0.26	0.5	3.97	0.33
Leisure centre access	0.1	5.62	0.08	0.3	8.27	0.26
B656 (W)	0.8	3.43	0.45	0.8	3.3	0.44
Avenue One	0.5	4.06	0.33	1.7	7.18	0.63
2030 future baseline + forecast development traffic						
B656 (E)	0.4	3.21	0.27	0.5	4.07	0.34
Leisure centre access	0.1	5.73	0.08	0.4	8.51	0.27
B656 (W)	0.9	3.45	0.45	0.9	3.51	0.46
Avenue One	0.6	4.28	0.35	1.8	7.55	0.65

3.4 Therefore, HCC Highways has no concerns over the capacity of the road network to accommodate the proposals.

4. S106 Contributions

4.1 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.

4.2 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.

4.3 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). Strand 2 contributions should address the cumulative impacts of all development, large and small, facilitating delivery and enhancement of the necessary active and sustainable transport networks. These local sustainable networks must be provided in their entirety to provide the sustainable connections to the key trip generators, as such contributions will be pooled to fund these networks within the local area subject to any legislative restrictions), as supported by National Planning Policy Framework (NPPF).

4.4 This second strand contribution is intended to help implement broader transport measures in the catchments of new development from which contributions are secured. The need for second strand contributions will be balanced against the level of first strand contributions and any other relevant planning matters.

4.5 As briefly indicated previously KMC have calculated that the proposals may result in 62 new jobs (66 existing) and therefore offer a Strand 2 contribution of £37,943. HCC Highways has checked the information supplied by KMC and agree that a Strand 2 contribution of £37,943 (March 2024) is appropriate if the application proceeds. This would be allocated to the aforementioned NHDC LCWIP to ensure HCC policy compliant development.

Signed
Adrian McHale

21 November 2025