



Mark Youngman
Development Management Group Manager
Hertfordshire County Council
Postal Point CHN115
Farnham House
Six Hills Way
Stevenage
SG1 2ST

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: 26/00240/FP
HCC ref: NH/28203/2026
HCC received: 14 April 2026
Area manager: Manjinder Sehmi
Case officer: Geoffrey McMahon

Location

Barns At Winch Hill Farm, Winch Hill Road, Luton, Hertfordshire, LU2 8PA

Application type

Full Application

Proposal

AMENDED PROPOSAL

Full Planning Permission : Installation of replacement roofs and external cladding to existing outbuildings. Creation of vehicular access and egress off Winch Hill Lane. Installation of bike store, landscaping, fencing and hardstanding to provide 8 parking spaces

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 because the proposed access arrangements are detrimental to highway safety.

Following the Highway Authority's recommendation on 06/03/26 to refuse the original application, the applicant submitted a covering letter (dated 18/03/26) in which it accepted the Authority's position that a single point of vehicular access would represent the most appropriate and safest solution. Subsequently however the applicant has submitted revised documents including Drawing Ref. FP/2026/03/REVB (Proposed Site Plan), an amended Transport Statement, and the results of an automatic traffic count. These revert to the original proposal to serve the site via two separate vehicular access points onto Winch Hill Road, consisting of *left in / left out* driveways designed at a very acute angle of approximately 30 degrees to the public highway. When assessed as a whole, this access strategy would result in an unnecessary increase in vehicular conflict points and would introduce substandard access geometry, leading to increased highway safety risk. This conclusion remains valid notwithstanding the applicant's speed survey, which records an 85th percentile speed of less than 30 mph.

The provision of two access points along the site frontage would materially increase the distribution of turning and crossing movements onto the main road. On a rural carriageway, drivers do not typically expect frequent access interruptions, and dispersing site traffic across two locations reduces predictability for other road users. This increases the likelihood of conflicting and unexpected vehicle movements, undermines the legibility of the highway, and introduces additional braking and acceleration events, all of which are detrimental to safe and efficient operation. Established highway design principles seek to minimise the number of access points wherever possible, particularly where a single access is demonstrably capable of serving the development.

The safety concerns associated with the additional access are further compounded by its proposed geometry. The *left out* manoeuvre would be undertaken at a very acute angle of approximately 30 degrees, which is considerably below what would normally be regarded as acceptable for safe and intuitive vehicle egress. This geometry requires drivers exiting the site to look rearwards and over their shoulder to observe approaching traffic, rather than relying on forward visibility through the windscreen. Such an arrangement is counterintuitive to normal driving behaviour, increases driver workload at a critical decision point, and can lead to delayed or hesitant manoeuvres.

Although the applicant's speed survey indicates that the 85th percentile speed on the main road is less than 30 mph, speed alone does not determine the safety or acceptability of a junction. Equally important are the geometry of the access, driver ergonomics, and the ability of motorists to comfortably and reliably observe approaching traffic. In this instance, the acute exit angle would significantly reduce the practical effectiveness of any visibility splays, as drivers would be unable to naturally align themselves to make full use of the available sightlines. Judging vehicle speed and gap acceptance would therefore be more difficult, even at relatively modest traffic speeds.

The rural nature of Winch Hill Road further exacerbates these concerns. The absence of pedestrian and cycle facilities typically results in higher driver focus on maintaining progress rather than anticipating unusual or awkward access layouts. Vehicles emerging slowly or hesitantly from an acute angled junction are likely to be unexpected, increasing the risk of side impact or rear shunt collisions. The proposed arrangement may also encourage vehicles to edge forward into the carriageway while drivers reassess traffic conditions, creating additional hazard for approaching traffic.

As noted above, the applicant has previously accepted that a single access point is fully deliverable and capable of being designed to meet highway authority standards. The second access is not required to address capacity issues, is not necessary for emergency access, and offers no clear operational or safety benefit. Instead, it introduces additional conflict points and a substandard exit arrangement that appears to be driven by site constraints rather than sound highway design principles.

In conclusion, while the observed 85th percentile speed provides context for the operation of the road, it does not overcome the fundamental safety concerns arising from the increased number of access points and the proposed acute angle *left out* geometry. The cumulative effect of these factors would result in an unsafe and inefficient access arrangement. A single, well designed access point would minimise conflict, provide a clearer and more predictable interface with the highway, and enable vehicles to use the less-populated southern route both to and from the Cube Metals site. .

Signed
Geoff McMahon

28 April 2026