

Weston Parish Council response to revised GA2 Hybrid Application

Reference: 25/03080/HYA

10th September 2026

Weston Parish Council objects to the planning application for the following reasons.

Traffic volumes along Back Lane

In our February 2026 response to the initial application, we pointed out that the applicant's assertion that the proposed development would not create any additional vehicle movements along Back Lane was not credible and we recommended that a proper independent traffic survey be undertaken.

From the newly submitted documentation we can see that WSP were commissioned by the applicant through HCC to assess the accuracy of the COMET model in forecasting traffic flows resulting from the proposed development. WSP concluded that the model was ***"not performing well on some of the key links in the study area, especially in the AM peak on Great Ashby way, Back Lane and the links around A1(M) Junction 8."***

WSP therefore adjusted parameters in the COMET model to provide a more accurate forecast.

This revised modelling shows that the impact on Back Lane via Weston or Graveley will indeed be significant, but the applicant argues that the forecast flows remain within the capacity of the road. However, we would point out the following:

- 1. No recent data.** In response to our previous request that a comprehensive and up-to-date traffic assessment be carried out the applicant argues that this is not necessary. The reasoning given is that the applicant liaised extensively with HCC, that Back Lane was not identified as requiring assessment, and because National Highways raised no objection to the proposed development.

However, this response-overlooks the fact that the modelling appears to be based on a traffic survey conducted over a two-week period in March 2023, with only the data between 8-9 am and 5-6 pm being used. Assuming only weekdays were used, this amounts to making a decision on a 640-home development based on just 20 hours of 3½ years old data.

Moreover, the exclusion of Back Lane from the assessment may have contributed to the initial conclusion that: *"The Proposed Development will not create traffic flows from the development along Back Lane."* The revised Transport Assessment, by contrast, states that up to 16% of development traffic could use Back Lane on a regular basis.

High-quality data is an essential component of sound decision-making, and we suggest that the change in predicted traffic volumes along Back Lane from zero to 16% is sufficient evidence that a comprehensive new survey is needed.

- 2. Back Lane traffic forecast.**

The Transport Assessment states that the modelling assumes that all traffic assigned to North Hertfordshire (15%), Cambridge (0.4%) and South Cambridgeshire (0.6%) would travel via Calder Way/Back Lane. It then states that, in reality, only a proportion of North Hertfordshire traffic would choose that route. However, if Google Maps is used to plot a route from the junction of Great Ashby Way and Orwell Avenue (the access road to

Calder Way) to destinations virtually anywhere to the north, the route along Back Lane through Weston is invariably shorter and quicker during peak periods.

We therefore believe that drivers travelling to Baldock, Royston, Cambridge or other destinations north of Great Ashby will quickly identify that travelling through the Green Belt along Back Lane through Weston is a shorter and quicker journey than driving down Martins Way towards the heavily congested roundabout where Martins Way meets Hitchin Road, and then on to the A1 roundabout at Cory's Mill via the Lister Hospital roundabout.

All three of these roundabouts are heavily congested during peak periods, yet none is mentioned in the Transport Assessment.

3. **Graveley Junction 16.** The WSP report highlights an extremely serious problem that this development is forecast to cause in Graveley at the junction of Church Lane and the High Street (B197). Here the impact of the GA2 development is expected to increase average vehicle queues from 3.2 to 13.3 vehicles, with delays increasing from just over 1 minute to 4½ minutes. Paragraph 6.138 states that this will increase the junction's load to *"its maximum theoretical capacity"*, with an RFC value of 1.0.

Furthermore, parts of Back Lane near Graveley are effectively single-track, making passing impossible. Any build-up of congestion can therefore cause sections of the road to grind to a complete standstill. As new residents of the GA2 development become aware of peak-hours traffic problems in Graveley and Stevenage, the likelihood of northbound vehicles diverting via Weston will only increase.

4. **Misleading statement(s).** North Herts Council should be aware that at least one statement in the Transport Assessment is factually inaccurate. Paragraph 1.22 states:

"The greatest increase in delay anticipated as a result of the development at any location is 19 seconds along Martins Way during the AM peak hour."

Table 6.22, however, shows a 2030 increase in AM traffic delays at Junction 13 (Great Ashby Way and Orwell Avenue) of 108 seconds and a 2035 delay increase of 121 seconds. Table 6.24 shows that the development will result in an increase in traffic delays at Junction 16 in Graveley of 187 seconds.

Both of these locations show delay increases far greater than that predicted along Martins Way, and both are directly relevant to traffic using Back Lane.

These predictions are also highly relevant to traffic flows resulting from the GA1 development and the 96 residential properties that will have vehicular access directly onto Back Lane. In that development, the applicant argued that the majority of traffic would travel south via Calder Way and Orwell Avenue onto Great Ashby Way. However, if the predictions in this application are correct, there will be a significant increase in delays accessing Great Ashby Way, while the route to the west via Graveley and Junction 16 becomes intolerable. The likely result is that an even greater proportion of traffic from those 96 dwellings will leave the estate along Back Lane through Weston.

5. **Road safety.**

The revised Transport Assessment assesses the effect of GA2 on Weston and Graveley primarily by reference to vehicular junction capacity, queueing and delay at Junctions 16–18. It does not appear to assess the consequences of the forecast increase in traffic for pedestrian safety and amenity through the villages, notwithstanding the constrained and discontinuous pedestrian infrastructure on parts of the affected routes.

This is particularly concerning because the recorded collision assessment presented in the Transport Assessment considers Junctions 1-14 but does not appear to extend to Junctions 16-18. The conclusion that no material highway safety issues arise therefore requires further justification in respect of vulnerable road users in Weston and Graveley.

The Parish Council requests that the Highway Authority specifically assess the effect of the forecast GA2 traffic on pedestrians through Weston and Graveley, taking into account existing footway widths and continuity, locations where pedestrians are required to walk in or immediately adjacent to the carriageway, crossing points, vehicle speeds and forecast changes in traffic volumes.

Away from the villages we ask that a proper analysis of the traffic and safety implications be provided for the full length of Back Lane, with particular emphasis on the most vulnerable road users, particularly cyclists, horse riders and pedestrians.

Conclusion.

Although Back Lane and the villages of Weston and Graveley are likely to be affected by a smaller proportion of development traffic than areas within Great Ashby, up to 16% of traffic generated by 640 homes would nevertheless amount to a significant number of vehicle movements.

Furthermore, the narrowness of the lanes, the historic character of the villages, limited roadside protection and the absence of continuous footways in many locations will result in a disproportionately adverse impact.

We therefore request that NHC direct the applicant to provide comprehensive responses to the points raised.

Emergency Access

The applicant does not accept our request for a legal mechanism to ensure that the emergency access can only ever be used for that purpose. Unfortunately, there are examples within North Herts where conditions imposed when planning permission was granted have not subsequently been enforced.

Since all parties agree that the purpose of the emergency access is solely to provide access for emergency vehicles, there can be no good reason as to why this restriction should not be legally secured.

This will ensure that any future change would require a fresh planning application and associated public consultation.

Construction traffic

Although the documentation does not include a Construction Traffic Management Plan (CTMP) at this stage, we firmly believe that the environmental sensitivity of the site, together with its potential impact on neighbouring residents, necessitates the submission and approval of a comprehensive CTMP **before** planning permission is granted.

We note that the current documentation states that “*construction vehicles would be arriving from the south*”. While this statement is helpful, it falls short of an enforceable commitment. We therefore ask NHC to require an enforceable provision in the CTMP ensuring that no construction traffic associated with GA2 uses Back Lane, Weston, Graveley, Warrensgreen Lane or the rural highway network to the north of the site.

Water and sewage

The documentation makes clear that neither the drinking-water network nor the foul-water/sewage-treatment infrastructure has sufficient capacity for the development as proposed.

Drinking water.

For potable water, Affinity Water expressly states that the site is in a ***“water-stressed area”*** and that ***“the existing network does not have sufficient capacity to supply the development without upstream reinforcement works.”***

The reinforcement works described are intended to increase pumping pressure at Pinn Green Reservoir and activate a standby pump.

Affinity Water also identifies rainwater harvesting and grey-water recycling as desirable measures that should be incorporated into the development.

However, the documentation provides no clear detail as to when this reinforcement work will be delivered or whether the applicant intends to incorporate the recommended rainwater harvesting and grey-water recycling.

Since Affinity Water has statutory duties to plan for and provide supplies to new development, Weston Parish Council requests clarification as to whether Affinity's lack of objection confirms existing or planned water-resource availability, rather than merely that the distribution network can be reinforced to provide a connection. Specifically, what additional deployable water resource will meet the forecast annual demand from GA2, in which Water Resource Zone is that demand accounted for, and where and how is the 640-dwelling development allowed for in Affinity Water's current Water Resources Management Plan?

In particular, we request that the response distinguish between works required to increase distribution capacity or pressure at Pinn Green Reservoir and measures that actually increase the quantity of potable water available to meet the additional demand.

Sewage.

The foul sewage from GA2 is expected to be treated at Rye Meads Wastewater Treatment Works (WwTW), operated by Thames Water near Hoddesdon and Stanstead Abbots.

The applicant's Design and Access Statement states:

“Consultation with Thames Water have indicated that currently there is insufficient capacity within the sewer network and at the receiving treatment works for this development.”

It goes on to say:

“Modelling will be undertaken by Thames Water to determine the necessary mitigation works, which they will then undertake, as Thames Water are obliged to provide consented development with a suitable foul drainage solution.”

However, this model relies on a water company's statutory obligations after planning consent has been granted. In our view, that approach is no longer fit for purpose. Stevenage Borough Council has therefore modified its planning policy specifically in relation to Rye Meads, making wastewater capacity a **planning prerequisite** rather than relying solely on Thames Water's general statutory duty to accommodate development at a later stage.

We would also highlight NHC Local Plan Policy NE10 which states:

*“New development around Stevenage within the Rye Meads Sewage Treatment Works Catchment will need to demonstrate that additional potable water supply and consequential wastewater treatment capacity can be **achieved and implemented***

ahead of development without significant environmental impact, including adverse effects on designated sites.”

The East Herts Habitats Regulations Assessment (HRA) for the Gilston Park/Gilston Area, published in 2023, suggests that the Rye Meads treatment works is approaching its maximum capacity. It further states that going beyond that will require “*an alternative treatment solution that does not as yet exist*”.

We therefore ask NHC to obtain or provide answers to the following:

- a) **Clarification from Thames Water as to whether its lack of objection represents confirmation of sufficient existing capacity, or of planned and budgeted capacity within the likely timescale of the development. Alternatively, does it simply represent an unbudgeted and unplanned expectation that additional capacity will follow at a later date?**
- b) **Clarification as to what specific capacity improvements at Rye Meads are required to accommodate GA2, in addition to the other developments Thames Water is required to accommodate at Rye Meads.**

We further ask that the response explicitly distinguish between storm-overflow performance, hydraulic treatment capacity, dry-weather-flow consent and environmental discharge consent.

- c) **If such works are planned, when will the necessary capacity works be completed and the additional capacity become available?**
- d) **Confirmation from Thames Water that Rye Meads treatment works will have sufficient capacity to accommodate all currently planned developments in addition to its existing treatment requirements.**
- e) **We ask NHC to clarify its precise interpretation of Policy NE10 in relation to this planning application.**

We therefore ask NHC not to grant planning permission for this development unless and until it is satisfied, on robust evidence, that Rye Meads treatment works can process the resulting wastewater without causing increased releases of untreated sewage, whether permitted or unpermitted.

Ecological concerns and Biodiversity Net Gain (BNG)

Various consultees and respondents have raised questions and concerns regarding the adequacy of the ecological research and mitigation measures, and the basis for the calculation of the 10% BNG requirement. Although the applicant has responded to some of these points, others remain unanswered and few appear to have been resolved.

Since these ecological requirements arise largely from planning and environmental legislation, we believe the issues raised should be formally addressed by the Local Planning Authority and the Council's ecological adviser.

The applicant states that it has had “*extensive correspondence*” with the Ecology Officer, yet there remains little clarity on many of the questions raised. For example:

- Can habitat that is necessary mitigation for the development's effects on ancient woodland, also legitimately generate the units relied upon to satisfy the statutory biodiversity net-gain requirement?
- What buffer depth does the Senior Ecologist consider necessary on this site to prevent harm to any of the ancient woodland? Is it really the 15m minimum or is a larger buffer required on this site?

- Whether any veteran or potential veteran trees would be lost or adversely affected, and whether any areas of the development are likely to encroach on their Root Protection Areas?
- Can areas beneath the overhead power lines be included in the BNG calculation?
- Have the badger and other wildlife assessments been conducted appropriately?
- Should a specific woodland nitrogen deposition assessment be undertaken? If not, can a clear explanation be provided as to why one is unnecessary.

This list is not intended to be definitive or comprehensive, but rather to provide examples of the ecological questions that require answers.

The Parish Council therefore requests an explicit written response from the Council's Senior Ecologist to all ecological and BNG questions raised. We believe this should be provided as soon as possible, because it could have major implications for the design of the site.

Brooches Wood W7 – ancient woodland buffer

The Natural England and Forestry Commission 'standing advice' for ancient woodland, ancient trees and veteran trees states:

"For ancient woodlands, the proposal should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage (known as the root protection area). Where assessment shows other impacts are likely to extend beyond this distance, the proposal is likely to need a larger buffer zone. For example, the effect of air pollution from development that results in a significant increase in traffic."

"For ancient or veteran trees (including those on the woodland boundary), the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area."

In this application, the principle vehicular access route for an estate of 640 home will be adjacent to Brooches Wood. It is therefore inevitable that there will be a *"significant increase in traffic"*, yet the submitted Arboricultural Impact Assessment only makes provision for a 15m buffer zone and further acknowledges (paragraphs 7.13 and 10.4) that the access road from Mendip Way will encroach into the ancient woodland buffer of Brooches Wood W7.

The applicant has not submitted an updated Arboricultural Impact Assessment following the subsequent amendments to the Mendip Way access. The amended access and road-section drawings do not demonstrate that the acknowledged buffer incursion has been removed, nor do they show the 15 m ancient woodland buffer against the current carriageway, active-travel route, drainage, lighting and associated engineering works.

The April 2026 *Ecology Matters Raised During Consultations & Further Mitigation Measures* note records ecological involvement in matters including lighting, bats and monitoring requirements for the Habitat Management and Monitoring Plan. However, it does not record specific approval by the Ecology Officer or Place Services of the proposed ancient woodland buffer width, the acknowledged incursion into that buffer, or the mitigation necessary to address any resulting impacts.

As the **Mendip Way access forms the full-planning-permission element of this hybrid application**, it is important that North Hertfordshire Council is fully advised on the potential effects of the current access design upon Brooches Wood **before** the application is determined.

It is also important that any consultation response or written advice from the Council's Ecology Officer or ecological adviser on this matter is made publicly available, so that interested parties, including those who have raised concerns regarding the woodland areas, have a reasonable opportunity to consider and comment upon it before determination.

Please provide the consultation response or written advice from the NHC Senior Ecologist and/or your ecological consultants specifically addressing:

- a) **The appropriate buffer width for Brooches Wood W7;**
- b) **The ecological implications of the Mendip Way access encroaching into the proposed 15 m ancient woodland buffer;**
- c) **Whether a buffer greater than 15m has been considered in light of traffic, lighting, drainage, construction and operational effects; and**
- d) **The mitigation measures considered necessary to avoid deterioration of the ancient woodland.**