



TRANSPORT NOTE

To: **Hertfordshire County Council (Highways)**
From: **Iceni Projects (Transport)**
Date: **December 2025**
Title: **Response to Highway Officer Comments**

a. Introduction

1. Iceni Projects have been appointed by Gladman Developments Ltd (the Applicant) to provide transportation advice regarding their development proposals on Land East of Pirton (the site). A planning application was submitted to Hertfordshire County Council (HCC) in July 2025 (Application Reference: 25/01696/OP) for the following:

Outline application for the erection of up to 130 dwellings with public open space, landscaping, sustainable drainage system (SuDS), and associated works with all matters reserved save for access.

2. Following the submission of this application, HCC highways have provided consultee comments, set out within a letter dated 11th August 2025. The full consultation response is included at **Appendix A1**.
3. This Transport Note has therefore been prepared to respond to the matters raised.
4. Extracts from the highway officer response are provided in blue *italics*, followed by Iceni Projects' comments in normal text. For ease, the responses are set out in the same order that comments were provided within the letter.
5. The Transport Note should be read in conjunction with the following Appendices:
 - **Appendix A1** – HCC Consultation Response
 - **Appendix A2** – Proposed Access Arrangement and Visibility Splay
 - **Appendix A3** – Distribution Assessment
 - **Appendix A4** – Queue survey results

b. Response to comments

Submit a Vision for the site and demonstrate the site will be sustainable as per NPPF Chapter 9 Promoting Sustainable Transport.

1. It is acknowledged that policy has moved towards a vision-led approach. The core principle of this proposal is to promote active and sustainable travel, where practically possible, to influence a positive modal share and provide residents with flexible and convenient choices to travel. This requires providing access to active and sustainable transport options. Providing choice also ensures people can change their travel habits to match all needs creating an inclusive travel environment for all ages and levels of mobility.
2. Opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making (NPPF paragraph 110).
3. The site is located to the east of Pirton, where several local amenities / facilities are located as set out within the Transport Assessment (TA).
4. The intention is for the internal layout to be designed to encourage active travel and connect to existing and proposed pedestrian and cycle links surrounding the site, as well as make use of bus services.
5. A connectivity study has been undertaken and will be submitted alongside this response note. The Connectivity Study will identify everyday destinations such as schools, convenience stores, post office and leisure, together with an assessment of the walking/cycling routes to those destinations to review any improvements which can be made to further encourage active travel and public transport use.
6. It is important to note that ultralow and zero emission vehicles are considered to be a sustainable transport mode, as defined in the National Planning Policy Framework (reference: Glossary, page 79). Whilst only outline at this stage, the proposal will provide electric vehicle charging facilities for all dwellings in accordance with Building Regulations Approved Document S.
7. Therefore, in summary, the proposals seek to support sustainable growth and regeneration. The site can provide minor improvements to connectivity, including walking infrastructure such as dropped kerbs and tactile paving, in order to improve routes for travelling through the village. The development proposals seek to provide realistic, viable and reliable modes of transport other than the private car for short to medium journeys.
8. The applicant is also willing to provide contributions to an improved bus service with a higher frequency and extending services later in the day, connecting existing and new communities within Hitchin and surrounding areas. The enhanced connectivity will improve the health of existing and future residents, encouraging active travel for short to medium journeys.

9. The vision and core principles set out above are therefore considered to align with the approach set out within National Planning Policy Framework (NPPF).
10. Further details of possible modal shift changes are discussed later within this note, and within the separate Travel Plan.

Provide further evidence to demonstrate that the site location supports sustainable travel choices for employment, education, and leisure, reducing reliance on private car ownership, as per HCC LTP Policy 1, Policy 2, Policy 4, Policy 5

11. As set out above, a Connectivity Study has been undertaken to highlight the facilities which are available within Pirton and the routes future residents are likely to take should they wish to travel on foot. The document also includes photographs to demonstrate where infrastructure is suitable, as well as highlighting where there are possibilities to improve the environment for pedestrian. This mainly includes the provision of dropped kerbs and tactile paving as highlighted in the document.
12. The referenced Policies from HCC Local Transport Plan are included below, followed by subsequent comments with respect to the proposed development.

Policy 1: Transport User Hierarchy

To support the creation of built environments that encourage greater and safer use of sustainable transport modes, the county council will in the design of any scheme and development of any transport strategy consider in the following order:

- Opportunities to reduce travel demand and the need to travel
- Vulnerable road user needs (such as pedestrians and cyclists)
- Passenger transport user needs
- Powered two wheeler (mopeds and motorbikes) user needs
- Other motor vehicle user needs

Policy 2: Influencing land use planning

The county council will encourage the location of new development in areas served by, or with the potential to be served by, high quality passenger transport facilities so they can form a real alternative to the car, and where key services can be accessed by walking and cycling.

Policy 3: Travel Plans and Behaviour Change

The county council will encourage the widespread adoption of travel plans through:

- a) Working in partnership with large employers, businesses and other organisations to develop travel plans and implement Smarter Choices measures.
- b) Seeking the development, implementation and monitoring of travel plans as part of the planning process for new developments.
- c) Supporting school travel plans, and working closely with parents, pupils, teachers and local residents to deliver a network of more sustainable transport links to school.

The application of personalised travel planning techniques, marketing and other behavioural change initiatives will be considered when delivering physical transport improvements to maximise the potential to achieve modal shift.

Policy 4: Demand Management

The county council considers greater traffic demand management to be essential in the county's urban areas in the next five years to achieve modal shift and improve sustainable travel provision. This can only currently be achieved efficiently and effectively through parking restrictions and charging applied to on-street, off-street and potentially at workplace parking. The county council will work with the district and borough councils and other key stakeholders to develop locally appropriate strategies.

Policy 5: Development Management

The county council will work with development promoters and the district and borough councils to:

- a) Ensure the location and design of proposals reflect the LTP Transport User Hierarchy and encourage movement by sustainable transport modes and reduced travel demand.
- b) Ensure access arrangements are safe, suitable for all people, built to an adequate standard and adhere to the county council's Highway Design Standards.
- c) Consider the adoption of access roads and internal road layouts where they comply with the appropriate adoption requirements and will offer demonstrable utility to the wider public. Where internal roads are not adopted the county council will expect suitable private management arrangements to be in place.
- d) Secure developer mitigation measures to limit the impacts of development on the transport network, and resist development where the residual cumulative impact of development is considered to be severe.
- e) Require a travel plan for developments according to the requirements of 'Hertfordshire's Travel Plan Guidance'.
- f) Only consider new accesses onto primary and main distributor roads where special circumstances can be demonstrated in favour of the proposals.
- g) Resist development that would either severely affect the rural or residential character of a road or other right of way, or which would severely affect safety on rural roads, local roads and rights of way especially for vulnerable road users. This should include other routes which are important for sustainable transport or leisure.

13. The scheme has been designed with consideration to active travel users within the site, with connections provided into the neighbouring site where possible. The application is in outline and therefore the internal routes and layout of footways will be determined within a Reserved Matters Application (RMA).
14. With regards to passenger transport needs, as set out within the TA, there are no formal bus stops with shelters within Pirton but, instead, it is recognised as a 'hail and ride' service. The service routes along Holwell Road, past the northwest corner of the Site and therefore the site is well located for future residents to access the bus service.

15. Due to the size of the scheme, it is not considered likely that the vehicle trips would have a severe impact on on-street parking. However, the policy is noted that county council will be working with district boroughs to develop appropriate local strategies.
16. The vehicle access has been subject to a Stage 1 Road Safety Audit which was submitted with the application. With respect to adoption of roads, it is noted and this will be confirmed as part of the RMA.
17. As per the capacity analysis undertaken, none of the junctions have been shown to operate above capacity and the development is not considered to have a severe impact.
18. A Travel Plan was submitted with the application, which has been updated following HCC comments and will be re-submitted alongside this response note.

Undertake an audit of the suitability of footways, cycleways, and public transport.

19. Details of the Connectivity Study have already been set out within this note. Further details with respect to methodology are outlined within the document itself.
20. It is considered important to recognise that the site is located directly adjacent to the recently constructed residential development known as 'Comice Meadows'. The scheme received planning permission in May 2015 (ref number: 15/01618/1) and is understood to have been constructed in 2019/2020 and is now fully occupied. It is expected that residents of the recently Comice Meadows scheme currently use the facilities within the village and their journeys, whether undertaken on foot or by bike, have been suitable which is demonstrated through the lack of any collisions or accidents occurring over the past 5 year period. Future residents of the proposed development are likely to have the same travel patterns given they are adjacent, and distances to facilities within Pirton are the same.
21. Further, it should be reiterated that a planning application was submitted in June 2017 for 99 units (planning application ref: 17/01543/16) at the site. The scheme was subsequently refused in September 2017. Following the refusal, an appeal was lodged.
22. The inspector discussed the matter of accessibility within the appeal decision and concluded the following with respect to accessibility:

"I acknowledge that the existing level of service is limited, particularly for return trips at and beyond the evening peak and at weekends, and that some doubts about its reliability were voiced at the Hearing. However, at current levels it could allow a realistic alternative for at least some commuting and daytime shopping and leisure trips..."

...However, this would not alone provide justification to reject the proposal".

18. Further to this, the appeal decision also outlined the following in regard to Highway Safety:

"In the absence of any objection by the highway authority, there are no good grounds to conclude that increased traffic from the appeal site would add any unacceptable risk to the safe operation of the junction or of roads in and around the village".

19. Therefore, whilst the Inquiry was dismissed, there was no reason for refusal relating to Transport or Highways.

Provide realistic options to achieve promote and achieve a non-car dominant development.

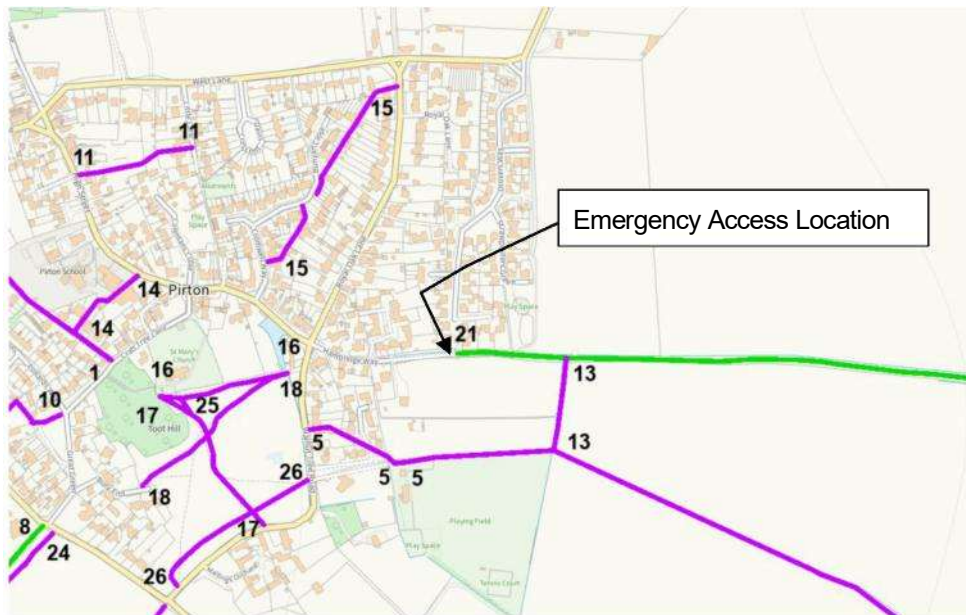
20. Full details of existing facilities and opportunities for sustainable travel were include within the Transport Assessment and, details of walking routes are now included within the Connectivity Study.
21. In addition, the applicant has made a commitment to promote sustainable travel, where possible, through the submitted Travel Plan, which has now been updated and being submitted alongside this note. This includes undertaken surveys to determine baseline data, with further surveys over a 5-year period to understand if initiatives and working and residents are choosing to travel sustainably.
22. The applicant has also given a commitment to providing discounts to bus and train services over a certain time period to further encourage public transport use, as well as promoting the facilities and services available at the time.
23. The various initiatives and objectives are contained within the Travel Plan, including targets to improve sustainable travel over a 5-year period.

Demonstrate that the proposed site access junction complies with the HCC Place and Movement Design Guide and alignment with LTP4 objectives (i.e., prioritising sustainable travel over car use).

24. It is proposed for vehicular access to be facilitated via Coopers Elms by an extension to the existing carriageway into the development site. It is also proposed to extend the two footways which currently exist on the north and south side of Coopers Elms into the development site. The width of Coopers Elms is 5.5m and it is proposed to retain the same width entering into the site, including the two 2m wide footways.
25. This proposal is retained from the previous planning application, which was considered acceptable by the highway authority.
26. They key matter being the width of the road (5.5m) and provision of two 2m footways either side is in accordance HCC Place and Movement Design Guidance. There are also connections into the neighbouring site at the southern end of the of the proposed development, which is likely to create a shorter walking route for pedestrians accessing facilities within Pirton.
27. The highway comments have requested an annotated plan showing the vehicle access proposals, particularly referencing the measurements for the visibility splay shown. Appendix A3 of the submitted Transport Assessment included such a plan, and annotations highlight the width of the carriageway, as well as footway width.
28. With regards to visibility shown on the plan, the key (shown within the boarder of the drawing) provides details of the visibility splay measurements shown. For ease of reference, the plan which was submitted within the TA has been included at **Appendix A2** of this note.
29. It is noted that comment is made to the emergency access from the neighbouring site onto Hambridge Way. There appears to be some confusion around whether this is an existing emergency access or not.

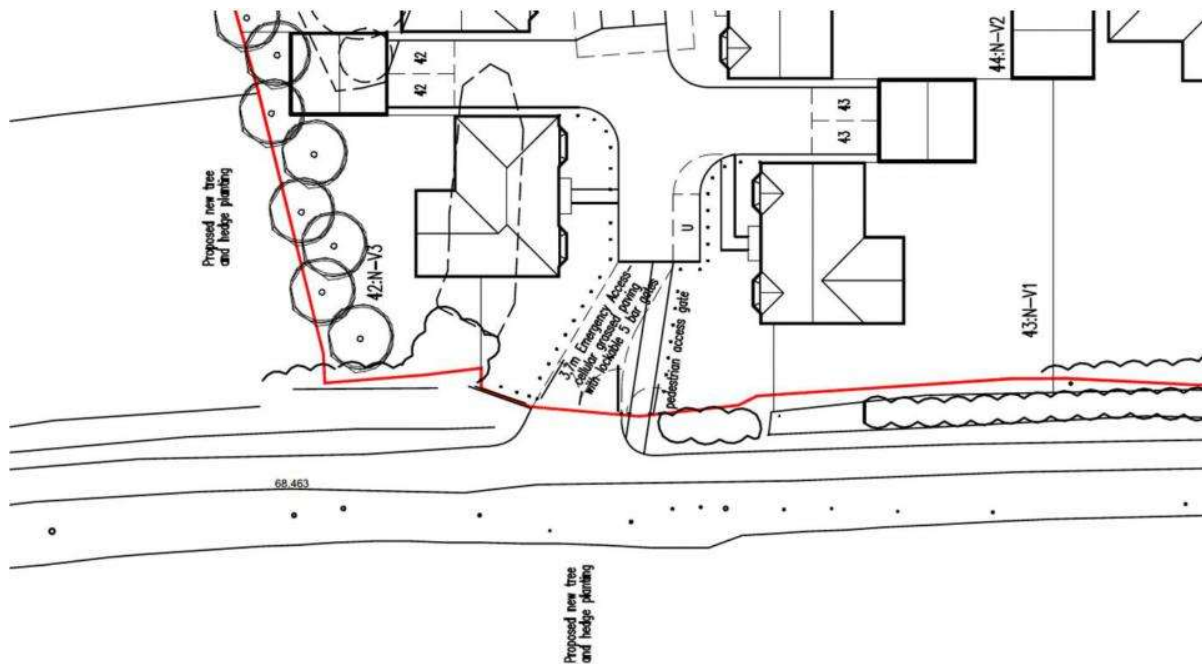
30. The comments query whether vehicles are permitted along a Bridleway, however HCC online mapping highlights the bridgeway does not formally begin until just east of the emergency access – see **Figure 1** below.

Figure 1 Extract from HCC Public Right of Way Map



31. Further, the outline application (ref: 15/01618/1) submitted 17/06/2015 displayed an emergency access via Hambridge Way throughout the application.
32. This was again referred to in the Reserved Matters Application (ref: 16/02256/1) submitted 03/10/2016, displaying an emergency access to the south of the scheme through Drovers Way leading onto Hambridge Way within the Site Layout (DRG. NO 16/008/011G) dated August 2016.
33. A snapshot of the emergency access can be seen from **Figure 2**.

Figure 2 - 'Reserved Matters Application Layout Plan' (DRG. NO 16/008/011G)
Dated August 2016



Conduct further analysis of multi-modal trip generation and mode share and carry out additional analysis of trip distribution and assignment.

34. It is recognised that the vehicle trips have been considered acceptable and that multi modal trip rates are required. For reference, the accepted trip generation rates are outlined below.

Table 1 – Proposed Vehicle Trip Generation

	Trip Rate			Total Trips		
	Arrivals	Departures	Two-Way	Arrivals	Departures	Two-Way
AM Peak	0.176	0.402	0.578	23	52	75
PM Peak	0.344	0.161	0.505	45	21	66

Note: Based on 130 units

35. It can be seen that the trip rates forecast 75 two-way trips in the AM peak and 66 two-way trips in the PM peak.
36. In order to forecast multi-modal trip generation, consideration has been given to the 2011 Census Method of Travel to Work data for North Hertfordshire 014 MSOA, which the site is located within. 2021 data could not be considered as the surveys were undertaken when Covid 19 restriction were in place and therefore the data is not representative. **Table 2** outlines the 2011 Census Data.

Table 2 – 2011 Census Data – North Hertfordshire 014 MSOA

Mode	Share
Train	10.3%
Bus	1.5%
Taxi	0.2%
Motorcycle	1.0%
Driving car/van	74.7%
Passenger	4.4%
Bicycle	1.4%
On foot	6.6%
Total	100%

48. **Table 3** outlines the forecast multi modal trip generation by factoring the vehicle trip generation outlined in **Table 1** with the 2011 Census Data in **Table 2**.

Table 3 – Multi Modal Trip Generation – Based on 2011 Census Data

Mode	% split	AM Peak			PM Peak		
		Arrival	Depart	Two-way	Arrival	Depart	Two-way
Train	10.3%	3	7	10	6	3	9
Bus	1.5%	0	1	2	1	0	1
Taxi	0.2%	0	0	0	0	0	0
Motorcycle	1.0%	0	1	1	1	0	1
Driving car or van	74.7%	23	52	75	45	21	66
Passenger	4.4%	1	3	4	3	1	4
Bicycle	1.4%	0	1	1	1	0	1
On foot	6.6%	2	5	7	4	2	6
Total	100%	31	70	101	60	28	88

49. It can be seen that the majority of trips are expected to arrive/depart by car, with 75 two-way trips in the AM peak and 66 two-way trips in the PM peak. The next highest is public transport (10-12 trips), followed by walking (6-7 trips) and car passengers (4 trips). It is estimated that cycling could be 1 trip.

50. The Travel Plan submitted with the planning application includes mode share targets and the table included within the TP is replicated below. This shows that it is anticipated that trips associated with a 10% reduction in single occupancy car trips would be split across more sustainable modes, with train, bus, car passenger, walking and cycling trips all shown to increase by 2%.

51. These targets have not been queried in the Travel Plan Comments within HCC's response so it is assumed that these are considered to be suitable, subject to baseline surveys being undertaken for the site once occupied.
52. As outlined in the TA submitted with the application and further reaffirmed within this Note, it is considered that no mitigation is required given the quiet nature of the surrounding roads and the presence of existing pedestrian and cycle routes to the facilities and amenities within Pirton.
53. To reiterate, while it is acknowledged that policy has moved towards a vision-led approach, this is more geared at larger developments where public transport and active travel improvements are proposed as part of the development. This is not the case for this application, so a vision-led approach cannot be easily applied to a smaller development on the edge of an existing settlement. The development is not of a scale where significant mitigation proposals would pass the planning obligation tests and therefore the development proposals are not inherently bringing about a change in sustainable travel trips that a larger development providing new routes and facilities would.
54. Furthermore, NPPF paragraph 110 states that:

“opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”

55. As such, not all development should be expected to make improvements to existing facilities in rural locations and, while this has been considered, the existing facilities are considered to be appropriate based on the low level of traffic in Pirton and options to access the village centre on foot and cycle already available as outlined.

Table 4 – Travel Plan Targets

Mode of Travel	Baseline	Year 1 Target	Year 2 Target	Year 3 Target	Year 4 Target	Year 5 Target
Train	10.3%	10.7% (+0.4%)	11.1% (+0.8%)	11.5% (+1.2%)	11.9% (+1.6%)	12.3% (+2%)
Bus, Minibus or Coach	1.5%	1.9% (+0.4%)	2.3% (+0.8%)	2.7% (+1.2%)	3.1% (+1.6%)	3.5% (+2%)
Taxi	0.2%	0.30%	0.30%	0.30%	0.30%	0.30%
Motorcycle, Scooter or Moped	1.0%	0.70%	0.70%	0.70%	0.70%	0.70%
Driving a Car or Van	74.7%	72.7% (-2%)	70.7% (-4%)	68.7% (-6%)	66.7% (-8%)	64.7% (-10%)
Passenger in a Car or Van	4.4%	4.8% (+0.4%)	5.2% (+0.8%)	5.6% (+1.2%)	6.0% (+1.6%)	6.4% (+2%)
Bicycle	1.4%	1.8% (+0.4%)	2.2% (+0.8%)	2.6% (+1.2%)	3.0% (+1.6%)	3.4% (+2%)
On Foot	6.6%	7.0% (+0.4%)	7.4% (+0.8%)	7.8% (+1.2%)	8.2% (+1.6%)	8.6% (+2%)
Total	100%	100%	100%	100%	100%	100%

*Percentages subject to rounding errors.

56. The comments also outline that no indication of the MSOA selected has been provided in the TA. For clarity, paragraph 5.16 of the TA confirms the assessment is based upon North Hertfordshire 014, which aligns with HCC response.
57. With regards to distribution, extending this to all journey purposes is considered excessive for a development of this size located within a village. Any trips within Pirton can and likely will be made by active travel. Trips outside of Pirton to larger surrounding towns will predominantly be made by car or bus, with some trips also being made by cycle, particularly to Hitchin.
58. Trips to other towns such as Luton, Bedford and Stevenage will predominantly be made by car. While there is data available on method of travel to work to enable an assessment of likely commuter distribution, the same is not readily available for other journey purposes.
59. For clarity, the distribution of trips is based on the most likely route to either the central point or likely destination (e.g. business park, town centre, hospital, school etc.) identified within each MSOA to which residents will be likely to travel to for work purposes. Full details of the locations used are included in **Appendix A3**.
60. The highways comments have also requested confirmation as to whether the MCC turning count surveys are supported by queue surveys. For clarity, queue survey information was also collected alongside the count surveys and have been included within **Appendix A4** of this note.

A1. HCC CONSULTATION RESPONSE



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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: 25/01696/OP
HCC ref: NH/25772/2025
HCC received: 18 July 2025
Area manager: Manjinder Sehmi
Case officer: Samuel Tearle

Location

Land South East Of Holwell Road And North Of Hambridge Way, Pirton, Herts,

Application type

Outline

Proposal

Outline application for the erection of up to 130 dwellings with public open space, landscaping, sustainable drainage system (SuDS), and associated works with all matters reserved except for access

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 as it is currently contrary to HCC LTP Policy 1, Policy 2, Policy 4, Policy 5 and NPPF Paras 109, 115, 117, 118.

Additional details are required, and the applicant must demonstrate the site's sustainability, accessibility and highway safety credentials:

- Submit a Vision for the site and demonstrate the site will be sustainable as per NPPF Chapter 9 Promoting Sustainable Transport.
- Provide further evidence to demonstrate that the site location supports sustainable travel choices for employment, education, and leisure, reducing reliance on private car ownership, as per HCC LTP Policy 1, Policy 2, Policy 4, Policy 5
- Undertake an audit of the suitability of footways, cycleways, and public transport.
- Provide realistic options to achieve promote and achieve a non-car dominant development.
- Conduct a further review of the Local Cycling and Walking Infrastructure Plan, Cycle Infrastructure Design – Local Transport Note 1/20 (2020), and Inclusive Mobility (2021).

- Demonstrate that the proposed site access junction complies with the HCC Place and Movement Design Guide and alignment with LTP4 objectives (i.e., prioritising sustainable travel over car use).
- Conduct further analysis of multi-modal trip generation and mode share and carry out additional analysis of trip distribution and assignment.
- Submit further details on the Travel Plan.

COMMENTS / ANALYSIS

Proposal Description

The proposal is for the erection of up to 130 dwellings (comprising 52 affordable units) with public open space and other associated works, keeping all matters reserved at this stage except for access.

Access to the site is proposed via the adjacent Coopers Elm by extending the road into the development site.

Site Description

The site is currently greenfield and is located to the east of Pirton village. The site is bound to the west by residential dwellings, to the south by Hambridge Way, to the east and north by undeveloped land.

History

A review of the Council's online record of planning applications has identified the following planning applications of direct relevance to this application:

1. 17/01543/1 - Outline planning application for the erection of up to 99 dwellings with public open space, landscaping and sustainable drainage system (SuDS) and vehicular access point from Holwell Road; All matters reserved except for means of access. The application was refused on 18 September 2017, following which an appeal was made and was rejected on 18 January 2019 on grounds of site accessibility along with other non-transport related matters raised.
2. 17/02563/1 - Outline planning application for the erection of up to 85 dwellings with public open space, landscaping and sustainable drainage system (SuDS) and vehicular access point from Holwell Road; All matters reserved except for means of access. The application was refused on 15 December 2017.

The reasons for refusal for both the applications above were similar, with the key issue noted as the need for residents to rely more on private vehicles to use services/ facilities located outside of the immediate area.

Policy Review

The Transport Assessment submitted in support of this outline planning application has referenced the following policy documents:

- The National Planning Policy Framework (NPPF) (December 2024)
- Hertfordshire Local Transport Plan (LTP4) (2018 – 2031)
- North Hertfordshire Local Plan 2011 - 2031 (adopted November 2022)
- Pirton Neighbourhood Development Plan 2011 - 2031 (adopted April 2018)

Whilst the applicant has referred to the latest version of the NPPF, it must be noted that the TA fails to focus on a vision-led approach (NPPF Chapter 9). Review of the Local Cycling and Walking Infrastructure Plan (2023), Cycle Infrastructure Design – Local Transport Note 1/20 (2020) and Inclusive Mobility (2021) is required, to ensure adequate inclusive accessibility to local facilities

including public transport, shops and schools by active travel modes, in accordance with the Government's Gear Change policy agenda and the requirements of the Disability Discrimination Act (2005). Any improvement works to the highway must also be designed in accordance with the HCC Place and Movement Design Guide. Please note, whilst this review is requested as a bare minimum for all major planning applications, there remains concerns that the site remains in an unsustainable location.

Sustainability and Accessibility

Pirton is a small village with limited local facilities and amenities available, and therefore, the residents will need to travel outside of the village for daily commuting trips and visits to the retail stores available in Hitchin. Considering the location of the site and the existing walking, cycling and public transport options, it is likely that the residents will need to rely on private vehicles to make most of their trips.

The Highway Authority notes that the TA does not align with the vision-led approach set out in the National Planning Policy Framework (NPPF). The revised NPPF (2024) emphasises a vision-led approach to development, as outlined in paragraphs 109, 115, 117, and 118, to ensure sustainability.

To demonstrate compliance with the NPPF, the applicant should provide clear evidence of the site's sustainability by aligning with the requirements set by Active Travel England (ATE). This should include a robust assessment of active travel provision, accessibility to key destinations, and measures to promote sustainable transport modes.

The Highway Authority recommends that the Applicant demonstrates the sustainability of the site by assessing its accessibility to local amenities and public transport via active travel modes, including walking and cycling. This should include an evaluation of existing and proposed pedestrian and cycling infrastructure, ensuring safe, direct, and convenient routes that align with national and local active travel policies.

The ATE assessment toolkit outlines key criteria that developers must meet to ensure that new developments promote walking, cycling, and public transport use.

The ATE toolkit recommends demonstrating the site's sustainability by:

- Accurately forecasting active travel trips and assessing the accessibility of walking and cycling routes.
- Safe and direct pedestrian connections to local amenities within 800m should be ensured, along with well-designed cycling links to key destinations, including employment hubs and public transport.
- The site should be located within 400m of a high-frequency bus stop to support multimodal connectivity.
- Proposals should enhance off-site active travel and public transport infrastructure, prioritize pedestrian and cycling movement within the site, and create safe, inclusive public spaces.
- Adequate cycle parking and end-of-trip facilities must be provided.
- A robust travel plan with clear mode-share targets, monitoring, and remedial measures should be in place to encourage sustainable travel choices.

These requirements align with Local Transport Note 1/20 (LTN 1/20) and ensure that new developments contribute to a sustainable, low-carbon transport future.

More information on Active Travel England (ATE) assessment toolkit can be found at Active Travel England: planning application assessment toolkit - GOV.UK

As a minimum, the Highway Authority recommends the Applicant to undertake routes audits as mentioned below.

- Audit of the suitability of the footways and crossings on routes to local facilities on existing streets and design review of the proposed footways and crossings within the proposed development on new streets in accordance with Inclusive Mobility (2021) guidance. Assess likely proposed development trips and propose any necessary mitigation or design changes prior to planning determination. It is recommended to undertake route audit using Active Travel England's (ATE) Route Selection Tool (RST) and improvement be suggested accordingly.
- Audit of the suitability of the existing cycle routes to local schools and facilities on existing streets and design review of the proposed cycle routes within the proposed development on new streets in accordance with Cycle Infrastructure Design – Local Transport Note 1/20 (2020) guidance and the emerging LCWIP. Assess likely proposed development trips and propose any necessary mitigation or design changes prior to planning determination. It is recommended to undertake route audit using ATE RST and improvement be suggested accordingly.

Walking and cycling

Footways are located on either side of the Drovers Way all the way from the Coopers Elm to the Holwell Road/ Drovers Way priority junction, after which they terminate. Section 2.6 of the TA notes that an emergency access is located at the southern end of Drovers Way which joins Hambridge Way – a bridleway. An extract of the street imagery of the bridleway is shown below. The applicant should review whether a motorised vehicle is permitted along a Bridleway in order to serve the emergency access.



The other preferred route for accessing the amenities in the village is via the Holwell Road – Royal Oak Lane; however, this route does not have continuous footpaths and the pedestrians/ cyclists are required to use the vehicular carriageway (please see below). Further to this, the lack of street lighting may result in the future residents not to use these routes.



A primary school is located at a walking distance of approximately 1km to the west of the site, however this is not within the preferred walking distance of 800m as set out in the North Hertfordshire Local Plan 2011-2031. Additionally, Table 2.1 of the TA identifies the different local facilities such as Village Hall, churches and recreational spaces that are accessible via walk or cycle from the proposed development. The table indicates that the majority of these facilities, which are available in the village limits, are not in the vicinity of desirable walking distance.

While existing walking routes/ connections from the site to the different nearby local amenities have been detailed, the TA does not include an audit to check whether the suitability of the footways and crossings on these routes is in accordance with Inclusive Mobility (2021) guidance.

The TA identifies that there are no standard cycle lanes or shared use facilities in the vicinity of the site, and notes that “The surrounding roads are considered suitable for cyclists given the number and speed of vehicles in the vicinity are relatively low and the width of the road allow cars to pass”. However, no evidence of this has been provided to justify that the existing low-traffic roads are suitable for cyclists.

Policy T1 of the North Hertfordshire Local Plan 2011 – 2031 states that – for major developments, applicants demonstrate how safe, direct and convenient routes for pedestrians and cyclists will be provided. The lack of walking and cycling accessibility to the site goes against the Policy 1 (Transport User Hierarchy), Policy 2 (Influencing land use planning) and Policy 5 (development Management) contained within Hertfordshire LTP 4.

It is also recommended that the applicant discuss any improvement proposals involving Public Right of Way (PROW) with the HCC PROW officer.

Public Transport

The nearest train station at Hitchin is located approximately 6km southeast of the proposed development. A bus stop is located approximately 300m from the site to the northwest – Royal Oak Lane operating service 89. However, there is no indication of the bus stop on the Holwell Road and no associated facilities (flag and post arrangement/ waiting area, etc.) are available. Lack of footpaths combined with the unavailability of crossing points may be a deterrent to the future residents of the development to prefer public transport.

Table 3.1 of the TA provides the frequency of the bus service operating along the Hitchin – Henlow Camp route. The bus frequency information provided in Table 3.1 matches the operator information,

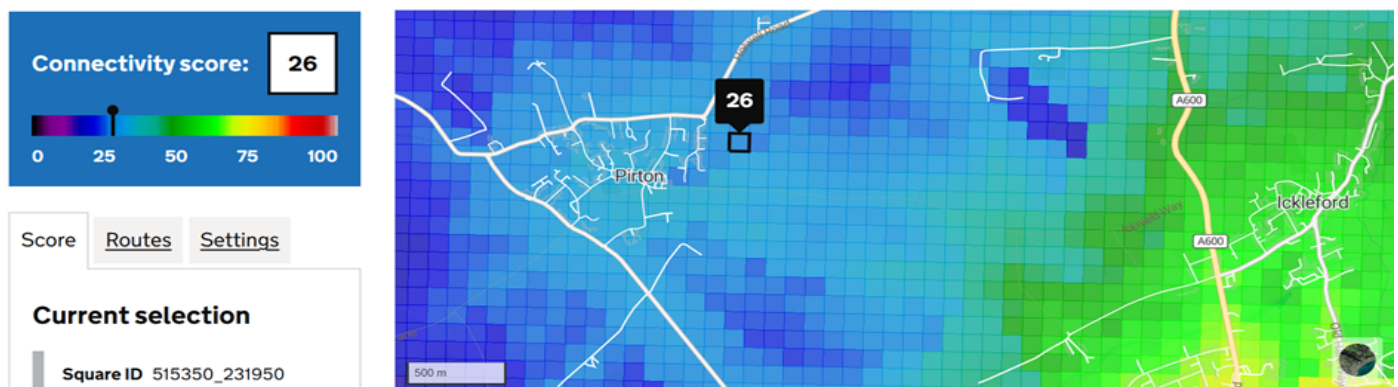
and indicates that the morning frequencies from Royal Oak Lane bus stop to Hitchin railway station are limited to one hour services at 6:55, 7:55 and 9:19 hours only.

The Bus Service Improvement Plan for Hertfordshire County Council (2021) identifies improvement plans and opportunities to promote public transport, which need to be identified and pursued within the TA.

DfT Connectivity Tool

The Department for Transport has released the first nationally agreed measure for determining connectivity levels of a location. The Connectivity Tool is intended to enable developments to be placed in the most sustainable locations and help plan the necessary infrastructure to support them. The tool combines transport and land use data to generate a connectivity score that measures people's ability to get where they want to go, using walking, cycling and public transport to reach jobs, shops, schools, healthcare and other essential services. This index measure provides relative connectivity and takes account of different destinations, modes of travel and travel time.

The location of the site is reported by the DfT to achieve a connectivity score of 26 out of 100.



This indicates a below average metric and highlights the need for additional infrastructure to make the area more connected, such as providing additional facilities and improving active travel and public transport connections.

It is concluded that further information is required to demonstrate that, in terms of sustainability, the location of the site is conducive to providing future residents with a realistic choice to private car ownership for day-to-day trips associated with employment, education and leisure purposes. This is particularly to emphasise that the development should be accessible to users of all classes irrespective of the gender, visual impairment or mobility.

NPPF paragraph 109 (e) requires opportunities to promote walking, cycling and public transport use be identified and pursued.

Road Safety

A personal injury collision analysis has been undertaken using data obtained from the Hertfordshire County Council for the five-year period covering from 2019 to 2024, which a single collision marked under slight severity in 2020. As such, no further assessment is required from the Applicant.

Additionally, we note that a Stage 1 Road Safety Audit (RSA) has been undertaken for the proposed access arrangement, which indicates no major traffic related concerns.

Access

It is proposed that the pedestrian/cyclist/vehicular access to the development will be served via Coopers Elm by an extension to the existing carriageway into the site, which remains the same as that proposed for the earlier planning application.

The proposed carriageway will have a width of 5.5m and the footpath extended from the existing Coopers Elm road via a 2m-wide footway on either side of the carriageway (Ref. Drawing – Proposed Access Arrangement I000653 – 01 - Rev A, dated 6 February 2025). A crossing point is also proposed at the start of the site access from where extension of the existing carriageway is proposed.

The TA is supported by swept path analysis and visibility splay analysis drawings. While a visibility splay diagram is provided, no measurements are available in the drawing (Ref. Drawing – Proposed Access Arrangement I000653 – 01 - Rev A, dated 6 February 2025).

Vehicle tracking for the site has been undertaken for a 12.2 x 2.5m long refuse vehicle as shown on drawing I000653 – 02, dated 11 June 2025. This shows a refuse vehicle turning from either direction into the site and safely exiting the site in both directions.

The Highway Authority would require the Applicant to submit a detailed annotated site access arrangement plan confirming alignment with HCC Place and Movement Design guidance.

Comments on Stage 1 Road Safety Audit

Any works within the highway boundary (including alterations to the footway) will need to be secured and approved via a s278 Agreement with HCC.

Internal Layout

As the application is in the outline stage, the internal site layout will be designed in detail during the reserved matters application. We acknowledge that the Applicant has noted that consideration will be given to HCC's Place and Movement Design Guidance, and MfS guidance. The guidance recommends a minimum carriageway width of 5.5m and a minimum forward visibility of 33m. It also provides standards for, but is not limited to, junction spacing, footway, and cycleway widths. It is recommended that compliance with the guidance be demonstrated.

The development proposals must include adequate footways to an acceptable standard dropped kerbs and tactile paving to enable safe and suitable access for pedestrians and mobility impaired users, in line with HCC Local Transport Plan Policy 1 and NPPF para 117 (a,b,c).

Parking

It is noted within the TA and other supporting documents that the development will provide car and cycle parking in line with policy requirements. We understand that this would be considered in detail during the reserved matters stage, however an indication of the spaces would be welcomed at this stage.

We recommend that the Applicant gives due consideration for provision of electric vehicle charging points, secured and covered cycle parking bays, blue badge bays, etc. to enhance the sustainable modes of transport and to ensure mobility of users of all classes. The Highway Authority would highlight that the cycle parking storage should be in line with the LTN1/20 guidance.

Servicing, Refuse and Emergency Access

The Applicant has submitted swept path analysis for a 12.2 m long refuse vehicle, which indicates that the vehicle can satisfactorily enter and exit the site from both directions.

Section 4.13 of the TA states that “Adequate storage for refuse and recycling will be provided in accessible locations and sufficient space will be provided in each collection location/area for refuse vehicles to manoeuvre so that they can enter and exit site in forward gear”. We acknowledge this and look forward to receiving detailed information in due course.

Trip Generation

The vehicular trips anticipated from the development have been calculated using a nearby proxy residential site. ATC surveys were undertaken at the site access off the adjacent Cala Homes scheme (82 units) on 8 May 2025, and two-way trip rates calculated from the traffic flow profiles for the standard AM and PM peak hours.

The total vehicle trips anticipated by the Applicant for the development proposal are provided below:

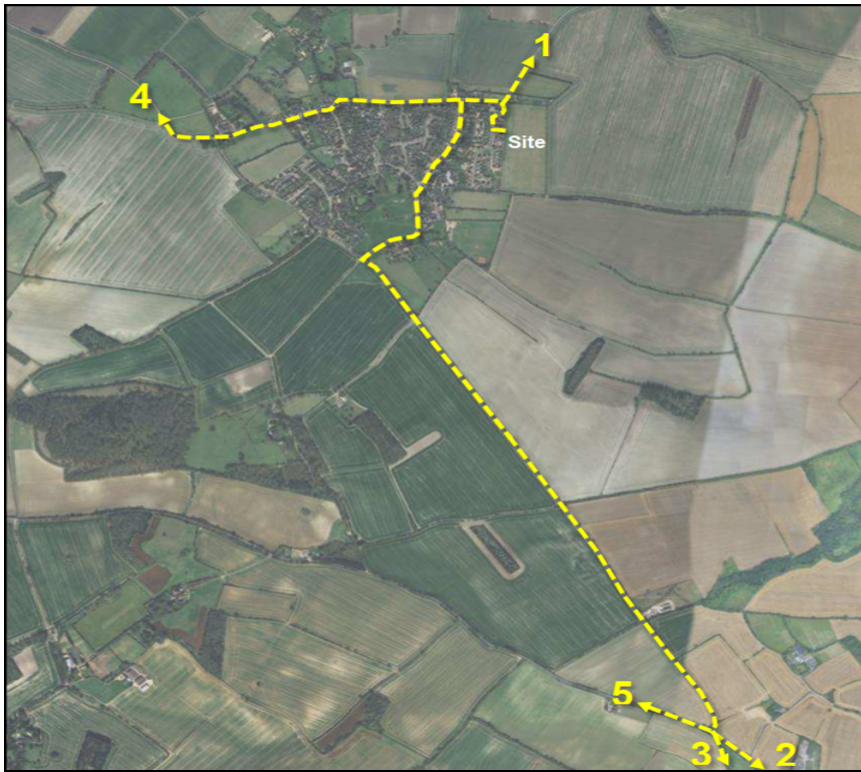
	AM Peak (08:00 to 09:00)			PM Peak (17:00 to 18:00)		
	Arrivals	Departures	Two-way	Arrivals	Departures	Two-way
Trip rate	0.176	0.402	0.578	0.344	0.161	0.505
Trip generation	23	52	75	45	21	66

Based on our checks, overall, we consider the vehicle trip rates presented in Table 5.2 of the TA as acceptable (also provided above). However, there is no mention of the vision-led approach and the likely shift. This is necessary to enable the further assessment of the likely development trips and propose any necessary mitigation or design changes to support local sustainable walking, wheeling, cycling and public transport trips.

Trip Distribution and Assignment

Section 5.7 of the TA states that “Origin and Destination’ data has been obtained from the 2011 Census to distribute the proposed development traffic to the wider highway network”; however, no indication of the MSOA selected is available. It is our understanding that this relates to the North Hertfordshire 014 MSOA, however we require clarity from the Applicant on this.

The trips were assigned to different routes via Google map routeing exercise, which has identified the following 5 routes for commuting purposes. While this provides an indication of distribution for the commuting trip purpose, no information is currently available on the other types of trips, such as education, social and recreation, etc.



While the current methodology of assigning commuting trips to the local highway network helps assess the case of work trips, it fails to account for other trip purposes as it provides no assessment of likely walking, cycling or bus trips and trip purpose from the proposed development, which is needed to assess any necessary mitigation or design changes to the footways/crossings, cycle routes and bus services.

Additionally, we recommend that the Applicant provides a list of key destinations assigned to each route to understand how the trips have been assigned.

Highway Impact

The applicant has undertaken detailed capacity assessments at the following junctions using Junctions software package.

1. Site Access Holwell Road / Drovers Way 'Bennett' Junction
2. Holwell Road / Royal Oak Lane / West Lane
3. Royal Oak Lane / Hambridge Way / High Street
4. Hitchin Road / Walnut Tree Road
5. B655 Hexton Road / Hitchin Road / Carters Lane

Baseline data: The Applicant commissioned Manual Traffic Count (MTC) at the above listed junctions covering morning and evening peaks respectively (AM - 7:00 to 10:00 hours, and PM - 16:00 to 19:00 hours). The surveys were undertaken on Thursday – 8 May 2025, and we consider that the survey day is neutral as it does not fall within bank or school holidays. However, we recommend that the applicant provides further information on the data suitability checks carried out to ensure that the data collected is robust and is free of any daily/ seasonal flow variations. No Automatic Traffic Counts (ATC) seem to have been undertaken, other than the ones used in support of the trip rates estimation. The Applicant is also required to clarify if MCC surveys are supported by queue surveys as well.

Traffic growth: The baseline traffic collected in 2025 have been growth to 2030 using TEMPro and we consider the growth rates presented in section 5.16 of the TA as acceptable.

Modelling assessment: Capacity assessments have been carried out for the following scenarios:

1. 2025 Existing Scenario
2. 2030 Base Scenario
3. 2030 Base + Development Scenario

Considering that there are outstanding matters as noted above regarding the trip generation and required Vision-led approach, HCC is currently not in a position to comment on the model results and development impacts.

Travel Plan

Having reviewed the Framework Residential Travel Plan (TP), the Highway Authority have the require the following updates:

- Confirmation that a secondary TPC contact will be provided to HCC prior to occupation.
- Estimated time commitment for the TPC role.
- Traffic data collection commitment as per HCC Travel Plan Guidance.
- Confirmation the travel plan will be reviewed annually, with a report submitted to HCC within three months of data collection.
- Confirmation that residential travel packs will be provided at a rate of £50 per flat and £100 per house and may include bus vouchers or vouchers supporting active travel.
- Confirmation baselines modal split and associated targets will be updated and reviewed following the completion of baseline survey data.
- Confirmation the the TPC will attend a meeting with HCC Travel Plan team to introduce and use the Modeshift Starts travel plan accreditation platform.

The applicant must note a full travel plan will be required for the site to be in place from first occupation until 5 years post occupation. A £1,200 per annum Evaluation and Support Fee is required for this period.

Planning Obligations

Once the above matters are resolved the Highway Authority will be in a position to outline any obligations.

Construction Traffic Management Plan

HCC would require a full Construction Traffic Management Plan to ensure construction vehicles would not have a detrimental impact on the highway network. A Planning condition would be required to provide adequate parking for construction vehicles on-site to prevent on-street conflict and impacts to the highway safety.

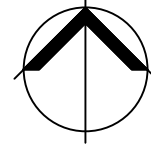
Conclusion

The Highway Authority wishes to raise an objection for reasons set out at the front of this response.

Signed

Samuel Tearle
11 August 2025

A2. PROPOSED ACCESS ARRANGEMENT



1. THIS DRAWING IS INDICATIVE AND SUBJECT TO DISCUSSIONS WITH LOCAL & NATIONAL HIGHWAY AUTHORITIES. THIS DESIGN IS ALSO SUBJECT TO CONFIRMATION OF LAND OWNERSHIP, TOPOGRAPHY, LOCATION OF STATUTORY SERVICES, DETAILED DESIGN AND TRAFFIC MODELLING.
2. THIS DRAWING IS BASED UPON OS MAPPING AND TOPOGRAPHICAL MAPPING PROVIDED WITH DRAWING TOPO-01_2D SUPPLIED BY GLADMAN DEVELOPMENTS AND ICENI PROJECTS LTD. SHALL NOT BE LIABLE FOR ANY INACCURACIES OR DEFICIENCIES.

2.4M X 40M JUNCTION VISIBILITY SPLAY
(BASED ON A ROAD SPEED OF 30MPH AS PER MFS STANDARDS)

TANGENTIAL VISIBILITY SPLAY

SITE LOCATION PLAN

AREA OF WORKS

ICENI PROJECTS LIMITED
DA VINCI HOUSE
44 SAFFRON HILL
LONDON
EC1N 8FH

T 020 3640 8508
mail@iceniprojects.com



CLIENT _____

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PROJECT _____

LAND EAST OF PIRTON

TITLE _____

PROPOSED ACCESS ARRANGEMENT

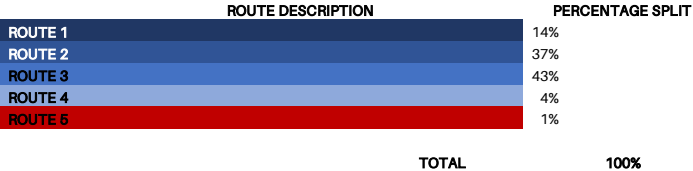
DRAWN BY AP	CHECKED BY RB	APPROVED BY RA
	06.02.2025	06.02.2025
SCALE @ A3 1 : 250	DATE 06.02.2025	
PROJECT NO. I000653	DRAWING NO. 01	REV. A

iceni Projects accept no responsibility for any unauthorised amendments to this drawing. Only figured dimensions are to be worked to.

A3. DISTRIBUTION ASSESSMENT

NOTES: ARRIVAL TIME TO EACH MSOA SET FOR 08:45 ON TUESDAY 15TH APRIL

DESTINATION	#	% SPLIT	ROUTE 1	ROUTE 2	ROUTE 3	ROUTE 4	ROUTE 5	NOTES
E02003259 : Luton 002	12	1%				0.3%	0.3%	ALDI, Scott Rd, Luton LU3 3BF
E02003270 : Luton 013	11	1%			0.2%	0.2%	0.2%	Luton & Dunstable University Hospital
E02003271 : Luton 014	102	6%			5.6%			London Luton Airport Mid Stay Car Park
E02003273 : Luton 016	14	1%			0.8%			Crawley Green Sports & Social Club
E02003275 : Luton 018	58	3%			1.6%	1.6%		Luton station
E02003276 : Luton 019	15	1%			0.4%	0.4%		rewfix Luton - Bilton Way, Unit 8 Bilton Way, Luton LU1 1
E02003278 : Luton 021	49	3%			2.7%			Stockwood Hotel
E02003603 : Central Bedfordshire 005	12	1%	0.7%					Asda Biggleswade Superstore
E02003608 : Central Bedfordshire 010	17	1%	0.9%					Arlesey station
E02003609 : Central Bedfordshire 011	30	2%	0.8%			0.8%		John R Ford & Sons Ltd - Ford
E02003611 : Central Bedfordshire 013	15	1%	0.8%					Carpet Trade Centre
E02003636 : Central Bedfordshire 018	12	1%				0.3%	0.3%	Barton Rovers FC
E02003644 : Central Bedfordshire 026	14	1%				0.4%	0.4%	Morrisons
E02004547 : Harlow 004	11	1%		0.6%				Canons Brook Golf Club
E02004868 : Dacorum 013	22	1%			1.2%			Halfords Autocentre Hemel Hempstead
E02004894 : East Hertfordshire 017	25	1%	0.5%	0.5%	0.5%			Hertford Town Football Club
E02004910 : North Hertfordshire 002	12	1%	0.2%	0.2%	0.2%			The Old Bull Inn Hotel
E02004912 : North Hertfordshire 004	22	1%	0.4%	0.4%	0.4%			Tesco Extra
E02004913 : North Hertfordshire 005	26	1%	0.5%	0.5%	0.5%			Sandon JMI School
E02004914 : North Hertfordshire 006	112	6%	3.1%	3.1%				Screwfix Letchworth
E02004916 : North Hertfordshire 008	61	3%	1.1%	1.1%	1.1%			Letchworth Sports and Tennis Club
E02004918 : North Hertfordshire 010	145	8%	4.0%	4.0%				Hitchin Mot Centre
E02004919 : North Hertfordshire 011	11	1%	0.2%	0.2%	0.2%			Highover School
E02004920 : North Hertfordshire 012	165	9%		9.0%				Foxholes Care Home
E02004921 : North Hertfordshire 013	26	1%	0.5%	0.5%	0.5%			HGS Tennis Courts
E02004922 : North Hertfordshire 014	176	10%						
E02004923 : North Hertfordshire 015	43	2%		1.2%	1.2%			Codicote C Of E Primary School
E02004924 : St Albans 001	13	1%			0.7%			Roundwood Park School
E02004925 : St Albans 002	14	1%			0.8%			The Amble Inn
E02004926 : St Albans 003	28	2%			1.5%			The Eric Morecambe Centre
E02004927 : St Albans 004	14	1%		0.4%	0.4%			Miller & Carter Wheathampstead
E02004930 : St Albans 007	10	1%		0.3%	0.3%			Sandridge Rovers Football Club
E02004935 : St Albans 012	32	2%		0.9%	0.9%			St Albans Crown Court
E02004938 : St Albans 015	14	1%		0.4%	0.4%			Smallford Farm Shop
E02004944 : Stevenage 001	11	1%		0.3%	0.3%			Morrisons Daily
E02004945 : Stevenage 002	71	4%		1.9%	1.9%			Lister Hospital
E02004948 : Stevenage 005	58	3%		1.6%	1.6%			Symonds Green Health Centre
E02004949 : Stevenage 006	12	1%		0.3%	0.3%			The Butterfly Room
E02004951 : Stevenage 008	59	3%		1.6%	1.6%			Sunbeams Pre School
E02004954 : Stevenage 011	65	4%		1.8%	1.8%			Four Seasons Pre School
E02004981 : Welwyn Hatfield 002	16	1%		0.4%	0.4%			The Bach Flower School
E02004983 : Welwyn Hatfield 004	62	3%		1.7%	1.7%			Unit 10, Quadrant Park Mundells, Welwyn Garden City AL7 1F
E02004985 : Welwyn Hatfield 006	52	3%		1.4%	1.4%			Barn Theatre
E02004986 : Welwyn Hatfield 007	29	2%		0.8%	0.8%			Peartree Pharmacy
E02004989 : Welwyn Hatfield 010	40	2%		1.1%	1.1%			University of Hertfordshire de Havilland Campus
E02004993 : Welwyn Hatfield 014	14	1%		0.4%	0.4%			North Mymms Cricket Club Ground
01023594 : North Hertfordshire 014	6	9%	0.9%					Ickleford Sports & Recreation Club
01023622 : North Hertfordshire 014	3	5%		0.5%				Hitchin Veterinary Surgery
01023623 : North Hertfordshire 014	2	3%		0.3%				The Strathmore Arms
01023624 : North Hertfordshire 014	5	8%			0.3%	0.3%	0.3%	The Lilley Arms
01023625 : North Hertfordshire 014	7	11%			1.1%			The Plough
01023653 : North Hertfordshire 014	41	64%			6.2%			Offley Endowed Primary School & Nursery
Total	64	###						
TOTAL	###	100%	14%	37%	43%	4%	1%	



PROJECT

Pirton, Hitchin

TITLE

DISTRIBUTION ASSESSMENT

REVISION

DATE

-

Nov-25

DRAWN BY

APPROVED BY

AP

RB / SP

A4. QUEUE SURVEY RESULTS



Project Reference:

25361 - Pirton Queue Report

UK	+44 (0)20 3883 7753
Ireland	+353 (0)44 931 8019
Belgium	+32 (0)334 606 35

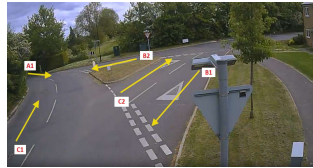
Website: idaso.co
info@idasoltd.com



IDASO

Survey Name: 25361 - Pirton Queue Report
Site: MCC 1
Location: Drovers Way/Holwell Road
Date: Thu 08-May-2025

Arm A - Holwell Road
Arm B - Drovers Way
Arm C - Holwell Road

[illegible]

IDASO

Survey Name: 25361 - Pirton Queue Report
Site: MCC 2
Location: Holwell Road/Royal Oak Lane/West Lane
Date: Thu 08-May-2025

Arm A - Holwell Road
Arm B - Royal Oak Lane
Arm C - West Lane

[illegible]

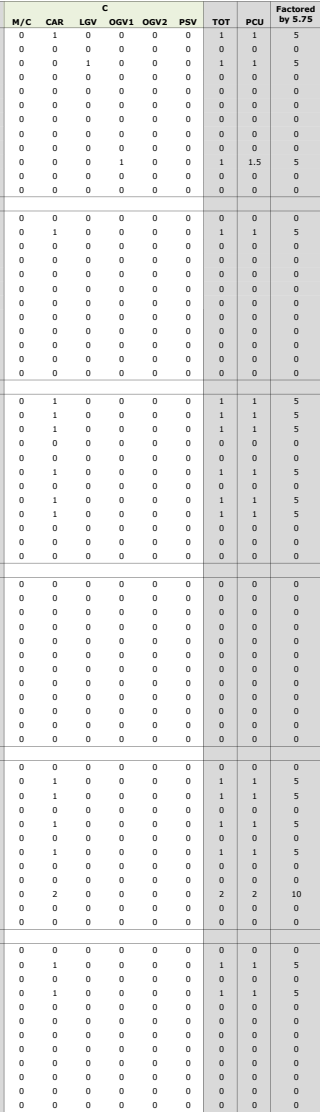


Arm A - Royal Oak Lane
Arm B - Hambridge Way
Arm C - Walnut Tree Road
Arm D - High Street

[illegible]



Arm A - Walnut Tree Road
Arm B - Hitchin Road
Arm C - Hitchin Road



IDASO

Survey Name: 25361 - Pirton Queue Report
Site: MCC 5
Location: Hitchin Road/Pirton Road/Carters Lane/Hexton Road
Date: Thu 08-May-2025

Arm A - Hitchin Road
Arm B - Pirton Road
Arm C - Carters Lane
Arm D - Hexton Road

[illegible]