

24/02889/FP – Land at Roundwood, Back Lane, Graveley

Representation on behalf of Great Ashby Community
Council

Introduction

This representation is submitted by Harwood Savin Planning Solutions Limited on behalf of Great Ashby Community Council (GACC) in respect of application reference 24/02889/FP for full planning permission for:

‘Residential development of 281 dwellings and associated roads, parking, realignment of Back Lane, drainage, landscaping, open space, servicing facilities and associated works’

On land at: Roundwood, Back Lane, Graveley

GACC wishes to lodge their **objection** to the proposed development for the reasons set out in this statement.

Policy Context

This objection has been prepared following a review of the proposals in the context of the Development Plan, comprising:

- North Hertfordshire Local Plan 2011-2031
- Hertfordshire Minerals Local Plan adopted in 2007 (HCC)
- Hertfordshire Waste Core Strategy and Development Management Policies Document, 2012 (HCC)
- Hertfordshire Waste Site Allocations Document, 2014 (HCC)

And the following guidance:

- National Planning Policy Framework 2023 (NPPF)
- Planning Practice Guidance
- National Design Guide 2019
- Relevant Supplementary Planning Documents (SPDs)

Section 38(6) of the Planning Compulsory Act 2004 requires that applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise. In addition, the NPPF makes clear at paragraph 47 that decisions on applications should be made as quickly as possible and within statutory timescales unless agreed otherwise.

Background

Planning applications were previously submitted in 2010 & 2016 for this site. The applications did not receive the support of the local community. Comments in 2016 included objection due to major concerns with the lack of adequate infrastructure, the access to the site, insufficient education and health facilities, and the impact on an existing residential area. Great Ashby Community Council submitted a response objecting to the 2016 application and supported this objection with an independent Travel Assessment which was commissioned jointly with Weston Parish Council and Graveley Parish Council. This planning application was not taken forward.

In November 2022, the developers held a public exhibition at Great Ashby Community Centre. Councillors from Great Ashby Community Council attended the public exhibition and observed public opinion. Concerns from the community mirrored that raised in 2016, namely the poor access to the site, utilising Back Lane which is inadequate, increased traffic through Mendip Way, Haybluff Drive, Calder Way, Bray Drive and Nevis Road, the existing parking problems in these roads, an increased burden upon Great Ashby Way which already suffers from congestion at peak times of the day, plus the general lack of infrastructure in Great Ashby.

A revised scheme was submitted in 2023. This scheme for 292 dwellings and associated works was withdrawn (ref. 23/02492/FP).

Considering the huge impact this development would have on the existing residents of Great Ashby, and bearing in mind the developer's failure to gain community support to date, both in respect of this current proposal, and previous schemes, it is disappointing that Great Ashby Community Council was not given the opportunity to contribute to a revised Masterplan or input into the early planning process, before the submission of this new amended full planning application. It is noted that a representative from Croudace attended a GACC meeting in late 2024, but as the proposals had not been finalised he was unable to answer specific questions and therefore GACC feel they were not fully aware of the detail of the proposals until the application was submitted. As a result, GACC's ability to input into the draft proposals was severely limited and once again, this current planning application has unfortunately not addressed residents' concerns.

The main changes detailed in the current application, compared to that of the 2023 proposals are summarised as follows:

- The number of houses has been reduced to 281 (from 292);
- The road access onto Back Lane has been altered;
- The site has been split into two parts, with no vehicular access between the two sides: 96 houses with access via Back Lane/Calder Way and 185 houses accessed via Haybluff Drive;
- The original line of Back Lane along the eastern side of the site is now proposed to be a greenway (no vehicles);
- Back Lane is now diverted through the western and northern region of the development. The Applicant's aim is to reduce the number of cars from the new houses being able to access Back Lane to Graveley or Weston. The Applicant's Transport Assessment states that 'the proportion of traffic looking to travel north

or west would be relatively small’ and this new design would ‘limit the increase in traffic on Back Lane as far as is reasonably practicable’.

Representation

GACC appreciates that the site is allocated for residential development under Policy GA1 of the Local Plan.

Policy GA1 clearly sets out the criteria against the development of the site must comply with, and these are also acknowledged in the Applicant’s Planning Statement at paragraph 6.2.3. For ease of reference, these are as follows:

- Detailed drainage strategy identifying water infrastructure required and mechanism(s) for delivery;
- Sensitive integration into existing settlement in terms of development layout and building orientation;
- Principal vehicular access taken from existing residential streets within Great Ashby;
- Provision for sustainable modes of transport having regard to the Stevenage Mobility Strategy;
- Transport Assessment to identify and secure measures to manage traffic flows arising from the development along Back Lane;
- Contribution towards appropriate GP provision across the north of Stevenage sites;
- Maintain general integrity of Weston Road, including as a through route for pedestrians and cyclists;
- Retention and sensitive treatment of priority woodland habitats surrounding site to north and west;
- Consider and mitigate against any adverse impacts upon adjacent local wildlife site at Parsons Green Wood;
- Integration of Footpath Graveley 010 as a perimeter feature around the north of the site; and
- Sensitive design and landscaping around northern and western peripheries to minimise impacts upon wider landscape and heritage assets, including the setting of the Scheduled Ancient Monument at Chesfield Church.

These criteria form a useful basis upon which to frame this objection. GACC’s Primary concerns relate to the following:

- Highways and transport issues including access, safety and congestion;
- Layout and design;
- Infrastructure provision and contributions;
- Housing need.

1) Highways considerations

Three access points to the site are proposed:

- From a continuation of Haybluff Drive to the east;

- From Back Lane, towards the north eastern corner of the site;
- From Back Lane, close to the junction with Calder Way, on the southern side of the site.

Vision LTP4 of Hertfordshire County Council's (HCC) Local Transport Plan considers that, in the hierarchy of transport users. The needs of more vulnerable road users should be a priority. Specifically, HCC Local Transport Plan 2018 (LTP4) page 47 states:

In recent years changes to the planning system have tended to separate land use planning and transportation planning even further. As a result in Hertfordshire the spatial patterns of allocated development sites, although potentially suitable in other respects, do not easily support the delivery of sustainable transport solutions.

This is very much the case in this instance. The lack of suitable existing road network causes significant problems for Great Ashby, Weston & Graveley in the provision of a safe and sustainable access solution to reach this site. We have fundamental concerns that the development does not currently meet with this vision.

HCC LTP4 Policy 5 seeks to:

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.

The proposed development destroys the rural nature of Back Lane and cuts the rural link between the villages of Weston and Graveley by diverting it through a built estate. The plan creates a rat run, diverting traffic through rural and residential roads which are unsuitable for through traffic, thereby putting vulnerable road users such as pedestrians, cyclists and horse riders in greater danger. A solution needs to be reached that addresses the needs of all road users as well as local residents before this proposal can be advanced.

Back Lane - runs along the eastern edge of the site and is in part a single-track road currently used by pedestrians, cyclists, horse riders and motor vehicles. This is a route frequently used by equestrian traffic to access the nearby stables. There have been recent incidents which have endangered horses and riders on this road. It has no pavement but is well used by walkers. A catalogue of recent incidents and very informative photographs are included within the objection submitted by Graveley Parish Council, confirming that accidents and 'near-misses' are frequent along Back Lane, with traffic often congested as the road is already too narrow for two vehicles to pass easily.

Increasing the number of vehicles will cause more safety issues particularly for the more vulnerable road users that the Local Transport Plan visions LTP4 aims to prioritise. Exiting the site from the south, turning right onto Back Lane from the site towards Graveley, the road is unsuitable for heavy good vehicles. Turning left, traffic would be forced through Calder Way due to the plan to prohibit traffic from a section of Back Lane.

This proposal will further increase traffic along Back Lane between Great Ashby and Graveley and also between Great Ashby and Weston. This is a single-track road along most of its length with high banks, no footpath or space at the edge of the road for walkers,

cyclists or horse riders, and several sharp bends. As it reaches Crow End on the outer edge of Graveley village there are two right angle bends and a very narrow stretch of road between the houses with no space for a pedestrian/horse if a car is there. The next narrow stretch of road downhill towards Graveley church is part of the Hertfordshire Way. There is no pedestrian footpath. Elderly residents from the nursing home use this narrow stretch of Back Lane with walkers or wheelchairs. There are six stable complexes along Back Lane, and along its length it is regularly used by horse riders, cyclists and walkers.

Back Lane has seen a significant increase in traffic over the last few years and is regularly used as a rat-run from Great Ashby to access the A1, Hitchin and Letchworth via Graveley. There are regular problems where large vehicles and even HGVs get stuck around Crow End. As described above there have been a number of dangerous interactions between cars and horse riders along Back Lane and it is already dangerous for non-vehicular users of this road. Back Lane is unlit and in winter during icy conditions Back Lane is untreated. All of these factors will increase the danger to road users (both vehicular and non-vehicular) if the traffic volume along Back Lane increases further and there is no reference in the proposals as to how the safety of non-vehicular users of the road would be maintained and enhanced.

Calder Way – Access arrangements to the site are considered wholly inappropriate for this scale of development, with some 96 new dwellings to be accessed in this location. Calder Way is a single-track road with two-way traffic, along which vehicles currently pass by making use of the entrances to the residential drives and closes. There is currently no pavement on this road. Increasing traffic on this road will be extremely hazardous to existing residents, as well as other vulnerable road users. It is clearly an inappropriate access route and is consequently totally incapable of supporting construction traffic.

Whilst it is noted that this access will serve a relatively small number of dwellings, and the main access will be via Haybluff Drive, there is no evidence of a vehicle tracking exercise having been undertaken to determine the feasibility of two-way passing along Calder Way. Despite the likely low number of trips using the route, it would usually be expected that this be demonstrated, with any current informal passing places formalised where required.

A vehicle tracking exercise should be undertaken to determine the feasibility of two-way passing along Calder Way. If appropriate, opportunities to improve/formalise passing bays should be investigated to ensure safe and suitable use of this route as a point of access to the proposed development.



Calder Way (looking north) from close to the junction with Great Ashby Way)



Calder Way (looking north, progressing towards the site from Great Ashby Way – note the narrow carriageway)



Calder Way (northern end, close to the junction with Back Lane – note the proximity of residential properties which significantly restrict the ability to widen the carriageway)

Widening Calder Way to make it easier for traffic to use this route in and out of Great Ashby from the proposed new development would reduce the amount of traffic from the new development going onto Back Lane to either Graveley or Weston. However, this is considered very difficult to achieve with the close proximity of residential properties and without the removal of established hedgerows and trees. Bearing in mind that residents of Calder Way already often receive abuse from traffic trying to pass through this lane, widening the road or using the access to their properties as passing points has the potential to worsen this problem.

Haybluff Drive – The accompanying TA suggests that Haybluff Drive will act as the primary site access. The access is proposed in the form of a give-way arrangement with carriageway narrowing to allow for the proposed non-motorised user route along the re-purposed section of Back Lane.

There has been very little supporting evidence submitted to suggest that this can operate in a safe and suitable manner. There is no evidence of a vehicle tracking exercise being undertaken to show two-way passing at this location between a refuse vehicle and car (demonstrating one waiting at the give-way line and the other manoeuvring past).

It is also noted that, as shown in Drawing PL08 provided in Appendix B of the associated TA, that there are proposals for additional TRO's along Haybluff Drive. Whilst this will aid the site access arrangements, there have been no drawings produced to demonstrate two-way passing along Haybluff Drive, given that some on-street parking is proposed to be retained (namely outside property 24 and 20).

The Applicant needs to undertake a vehicle tracking exercise at the proposed give-way arrangement, illustrating safe two-way passing of both a car and refuse vehicle. In addition, demonstrate safe and suitable passing along Haybluff Drive to ensure the TRO proposals are suitable.

Haybluff Drive is accessed from Great Ashby Way, the main circulatory route, via Bray Drive and Mendip Way. All of these roads are local residential streets within the existing estate, with high levels of on-street parking. Whilst some dwellings have off-street provision on driveways and within garages, and parking courts are also provided for use of the residents of the apartments, high levels of car ownership and the relatively limited nature of public transport, means that there are still significant levels of on street parking. Many family cars do not fit within the existing garages as they were originally built to minimum specifications.

It is noted that HCC has previously approved the painting of double yellow lines on junctions on Mendip Way to improve safety, but this has only served to reduce the level of available on-street parking provision. The Applicant's Transport Statement, at paragraph 2.21 acknowledges the fact that on-street parking on local roads is a longstanding issue as a result of residential development being constructed when policy advocated minimal parking provisions. Furthermore at paragraph 2.19 of the Transport Statement, the Applicant highlights that during pre-application discussions, the local bus operator has indicated that due to the current amount of on-street parking, especially on Mendip Way, they would not be prepared to operate a bus service along this road. Therefore, the Applicant acknowledges that, to make the proposed development at GA1 acceptable in planning terms, i.e. to enhance public transport, measures need to be taken to restrict on-street parking on Bray Drive and Mendip Way. In essence, existing residents of these streets are being penalised for both historic under provision, and the pressures generated by the new development at GA1. Following on from this, not only is the displacement of car parking on Bray Drive and Mendip Way considered necessary by the Applicant to facilitate bus provision, it would also be required for construction traffic.

To add further to the disruption and penalty to existing residents, the introduction of HCC's Local Transport Plan in 2018 resulted in a change to local transport policy with the loss of verges, which in this instance would be required to accommodate mitigation in the form of 'in verge bays', no longer considered to be policy compliant, and should only be considered as a last resort, especially as Mendip Way was originally designed with the intention of being a local bus route. Neither GACC or residents of these roads have been consulted on their preference for mitigation, should this development proceed as detailed in the application, despite planning policy encouraging input from local people throughout the planning process.

The proposed solution is for a 'manage and monitor' approach. This strategy is wholly unfair for existing residents as it introduces long term uncertainty that will continue well after the proposed development of GA1 has been completed. Existing verges on Mendip Way are already narrow and their removal will not only bring traffic closer to residential properties but will also substantially alter the leafy and verdant character of the area. Surely if existing residents already need to park on street corners, causing HCC to install double yellow line restrictions, surely this indicates that there is not currently a surplus of on-street provision and hence more fundamental alternative solutions need to be found to mitigate the impact of the proposed development at the outset, other than to just

restrict existing on-street provision and penalise existing residents in the hope that this will solve the problem.

Traffic data – GACC has concerns about the robustness of the transport data that underlies this application. The Transport Statement and analysis is based upon out of data census information, with journey to work data based upon the 2011 census, whilst car ownership is assessed on the basis of 2021 data. Clarification should be sought in this regard and adjustments made as appropriate.

Using the ONS Census data for 2021, car ownership within the parish of Great Ashby is higher than in Stevenage:

	Stevenage	Great Ashby
No Car	13.9%	6.8%
1 car	40.4%	35.2%
2 cars	33.3%	41.7%
3 or more cars	12.5%	16.3%

Great Ashby residents do not have the benefit of good local infrastructure and as a result there is a greater need for a car.

We do not envisage that the transport solution detailed within the application will encourage or enable residents of the proposed GA1 development to live a more sustainable life than the existing residents of Great Ashby.

Furthermore, the lack of modal shift towards sustainable travel within the whole of Hertfordshire would support the need for ensuring this development creates infrastructure to cope with the existing levels of car ownership and use, as well as provide good sustainable travel infrastructure. We would ask that the development is planned with this fact in mind. While sustainability should be encouraged and planned for, an over-reliance on the need for residents to change their travel habits to walk and cycle should not be enforced into the design. The design as shown in the application has potential to create a problematic development for the future, further impacting on existing residents within this area.

We note that the 2011 Census data has been used for modelling. However, this is problematic because although it may be seen to give a better understanding of how residents travel to work, it does not account for the flexibility employees have retained since the Covid-19 pandemic.

According to data from the ONS, the trend of remote and hybrid working has persisted even after the lifting of government guidance to work from home. In February 2022, more than 8 in 10 workers who had to work from home during the pandemic said they planned to continue with a mix of working from home and in the workplace. In 2025, a significant portion of the workforce still engages in remote or hybrid working arrangements. A recent

Forbes Advisor poll showed that 63% of respondents worked remotely either all or some of the time.

Further, working at home arrangements allow residents far more flexibility and we envisage that this is more evident in an increase in traffic due to deliveries and services to properties, and at school drop off and pick up times, which have not been accounted for by a desktop analysis.

Vehicle Tracking - Drawings (contained within Part 2) of the TA – The vehicle tracking drawings appear to illustrate a refuse vehicle manoeuvring through the site, but on the incorrect side of the road.

2) Layout and Design

Policy GA1 aims to ensure sensitive integration of the proposed development into existing settlement in terms of development layout and building orientation. Policy SP9 requires good design as part of sustainable development, including to:

- i. *create buildings, spaces and streets which positively reflect and respond to the local landscape, townscape and historic character*
- ii. *create integrated, accessible and sustainable transport systems with walking, cycling and public transport designed to be the most attractive forms of transport and effectively linking into the surrounding areas;*
- iii. *provide a clear structure and hierarchy of pedestrian friendly streets and well-connected footpaths and cycleways integrate with the wider built and natural environment and communities;*
- iv. *plan for integrated and mixed-use communities with walkable locally accessible community, employment and retail facilities;*
- v. *positively integrate with adjacent rural and urban communities and positively contribute to their character and the way the area functions, including addressing cumulative, cross boundary planning and infrastructure matters;*
- vi. *create an accessible multi-functional green infrastructure network that provides:*
 - *a key structuring and functional place-making feature supporting healthy lifestyles, sport, play and recreation linking into the wider Green Infrastructure Network; and*
 - *a high-quality integrated network to support ecological connectivity, biodiversity net gain, climate adaptation and mitigation linking into the wider Ecological Network*
- vii. *ensure the effective use of sustainable urban drainage and sustainable water management;*
- viii. *ensure a hierarchy of linked, high quality and attractive public spaces and public realm that is safe, attractive and supports social interaction for all age groups; and*
- ix. *design to last with a clear stewardship, management and maintenance strategy*

GACC has concerns regarding the design and layout of the proposed development. In the first instance, the proposed site layout appears somewhat regimented and contrived with

blocks of development especially on the southern part of the site. The south-eastern portion of the site is dominated by large areas of parking to the rear of the flats. The layout of the proposal does not fit with the more fluid and organic layouts of the adjacent housing developments, with the southern part of the site being far more sterile in its form and layout. The proposed layout fails to meet the requirements of Policy SP9(i).

Matters relating to Policy SP9(ii) have been dealt with in the commentary relating to transport above, and it is concluded that the proposals do not fully accord with Policy SP9(ii).

The proposal does not provide for an integrated and mixed-use community in accordance with part (iv) of Policy SP9. Existing community provision, including GP surgeries and primary schools are already under considerable stress and over-subscribed. The Great Ashby local centre facilities are located approximately 1km from the centre of the site, and a considerable walk for new residents. The local centre offer is currently limited and the built fabric would benefit from investment and upgrading. A development of this size should be capable of providing and sustaining some additional smaller scale community facilities within the red line area or by providing a contribution towards the enhancement of the existing provision. These matters must be considered through meaningful and achievable S106 provisions.

The proposal does not provide for a multi-functional green infrastructure network. Whilst there is a 'greenway' along the newly pedestrianised Back Lane, and along the northern edge of the site, a woodland buffer to the ancient woodland to the west and SUDS features along the southern boundary, these areas have limited recreational benefit. The SUDS areas in particular, are not suitable for play spaces for children. The current design does not provide for any managed, safe or secure play areas with equipment for children. The small area of structured 'orchard' style park is tucked away on the western side of the site, rather than being a central feature. There is a shortage of allotments in the Great Ashby area and currently no land for these to be provided. This site could have provided a contribution towards this shortfall especially towards the western part of the site as a buffer for the ancient woodland and a transition zone to the residential.

The proposed layout does not provide for a hierarchy of linked, high quality, attractive public spaces, or a public realm that is safe, attractive and supports social interaction for all age groups. Opportunities for interaction are limited with the open spaces being predominantly thin strips around the edge of the site, rather than formal play areas or informal kickabout spaces. The proposal does not comply with part (viii) of Policy SP9. A management and maintenance strategy must be secured through S106 obligations to accord with part (ix) of Policy SP9.

3) Infrastructure Provision and Contributions

Great Ashby is considered a town for the purposes of hierarchy in the adopted Local Plan, and the population numbers reflect this. However, Great Ashby lacks essential amenities such as a GP, a dentist, a secondary school and outdoor leisure facilities including sports pitches and courts. The local primary school, Round Diamond, is currently oversubscribed forcing Great Ashby's children to travel further to school and the proposed development will place additional demand upon this provision.

The Great Ashby Neighbourhood Centre Car Park is currently in need of repair including lighting issues and pothole repairs. Unfortunately, as this car park was owned by a private company which is no longer trading and has reverted to the Crown Estate, it is left without plans in place for maintaining it.

If this development proceeds, GACC request that NHC is provided with reasonable s106 contributions to support several much needed local initiatives including the purchase and repair of the Great Ashby Neighbourhood Car Park. We view this as a reasonable request to safeguard the centre for residents in accordance with paragraph 4.49 of the adopted Local Plan, which states:

The Council wants to improve and protect the District's centres [including Great Ashby], reduce the need for unnecessary travel to alternative facilities and ensure that the proportion of expenditure going outside the District does not increase.

GACC has an obligation to provide allotments and has demonstrated that there is a local need but no land within the area to facilitate this. We are aware that there are s106 funds available in principle for this purpose, although it would be preferable for these to be provided on site.

GACC will be writing under separate cover to make a submission in relation to S106 monies and their application.

4) Housing Need

The Applicant's Planning Statement, at section 6.6 deals with the proposed housing ix within the scheme. At paragraph 6.61, reference is made to the Council's Strategic housing Market Assessment (2016) which informed the policy basis within the Local Plan. However, the Planning Statement fails to reference the SHMA Part II Update (November 2023) which considers the new data that has been released since 2016. This needs to be assessed in relation to implications on housing mix.

5) Other Comments

GACC were advised at the pre-application public consultation that the site would comprise predominantly two storey dwellings. However, the scheme as submitted seeks a substantial number of three storey dwellings, especially on the extension of Haybluff Drive and the south-eastern part of the site. This is out of character with the form of development within the wider area.

Furthermore, the proposal seeks nine apartment blocks, comprising 81 units and a further 14 units as coach houses, a total of 95 units (33.8%) with no private amenity space. Bearing in mind the lack of meaningful outdoor amenity space, this approach is considered wholly unacceptable.

Concluding Comments

The proposed development fails to address a number of fundamental issues and as a result, does not comply with the requirements particularly of Policies GA1 and SP9 of the adopted Local Plan and Policies LTP4 and LTP5 of the HCC Local Transport Plan.

On this basis we formally raise our **OBJECTION** to the application in its current form and respectfully request that planning permission be refused.

17 February 2025