



Mark Youngman  
Development Management Group Manager  
Hertfordshire County Council  
Postal Point CH0242  
County Hall  
Pegs Lane  
Hertford  
SG13 8DE

## Response to Planning application from Hertfordshire County Council (T and CP GDP Order 2015)

### Director of Planning

Welwyn Hatfield Borough Council  
The Campus  
Welwyn Garden City  
Hertfordshire  
AL8 6AW

District ref: 6/2022/1097/OUTLINE  
HCC ref: WH/12343/2022  
HCC received: 23 May 2022  
Area manager: Matthew Armstrong  
Case officer: Samuel Tearle

### Location

Land to the North of Bradmore Way, Bradmore Way, The Brookmans Estate, Brookmans Park

### Application type

Outline

### Proposal

Outline planning permission with all matters reserved except access, for up to 125 dwellings, a care facility for up to 60 bedrooms (Use Class C2), and a scout hut (Use Class F2)

### 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 for the following reasons:

There is insufficient information supplied with this application to enable the Highway Authority to reach a decision in terms of highway safety and operation. In the absence of the necessary information, the Highway Authority recommends refusal due to doubt over possible implications for highway impact, safety, and convenience.

1. The traffic flow surveys on Bradmore Way have been undertaken during 'Walk to School Week' at Brookmans Park Primary School. Therefore, the results shown are in contrary to:

NPPG Paragraph 015 Reference ID: 42-015-20140306 which notes:

• *In general, assessments should be based on normal traffic flow and usage conditions (eg non-school holiday periods, typical weather conditions) but it may be necessary to consider the implications for any regular peak traffic and usage periods (such as rush hours).*

Additionally, the survey falls outside the neutral periods defined in DfT Tag Unit M.1.2 Paragraph 3.3.7 Data Sources and Surveys which notes:

*•Neutral periods are defined as Mondays to Thursdays from March through to November (excluding August), provided adequate lighting is available, and avoiding the weeks before/after Easter, the Thursday before and all of the week of a bank holiday, and the school holidays. Surveys may be carried out outside of these days/months, ensuring that the conditions being surveyed (e.g. traffic flow) are representative of the transport condition being analysed/modelled.*

Bradmore Way is the only access road to the site and therefore accurate baseline traffic flows are fundamental to determine the impact. In the absence of accurate baseline traffic flow conditions, the Highway Authority cannot be satisfied that the cumulative impact of the proposed development will not have a severe impact to the operation of Bradmore Way as a link and the junction with Brookmans Avenue.

Furthermore, the friction of movement of vehicles resulting in unsafe parking on footways, verges or blocking the highway during school drop off and collection times has not been established in the baseline, nor assessed following the trip generation. Parking beat surveys should be undertaken during the school drop off / collection to establish whether the additional traffic flow will create an unsafe highway and footway environment.

**2.** The proposals are also in contrary to NPPF paragraph 112 (a & b), which notes:

Applications for development should:

*a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*

*b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*

The TA has not included a walking audit of routes to the local facilities and amenities to the south of Bradmore Way where there are local facilities and amenities, the nearest bus stop on Brookmans Avenue, and Brookmans Park Station. From the proposed site, the only route to these facilities is via Bradmore Way, where there are a number of crossings with no tactile pavings, and severance occurs as there is no clear crossing route on a pedestrian desire line from Bradmore Way to westbound bus stops on Brookmans Avenue or to Station Close (to then access the station).

The applicant must submit additional information to resolve these issues. This will then enable the site fall in line with HCC LTP Policies 1 (Transport User Hierarchy), Policy 2 (Influencing Land Use Planning) and 5 (Development Management). It will also provide an improved pedestrian environment to Brookmans Park Primary School, and thus assist in encourage walking and cycling trips and resolving the issue above.

Once the above issues are resolved and mitigated, the Highway Authority will be in a position to recommend no objection subject to conditions, informatives and obligations.

## **COMMENTS / ANALYSIS:**

### **Description of Proposal**

An outline planning application for all matters reserved except access has been submitted for a proposed development consisting of up to 125 dwellings, a 60 bed care facility, and a scout hut has been submitted.

The proposals include vehicular, pedestrian and cycle access from the south of the site on Bradmore Way.

### **Site Description**

The existing site consists of agricultural land. The site is bound to the north by agricultural land, to the east by Brookmans Park Golf Club, to the south by residential streets of Bradmore Way and Peplins Way, and to the west by railway lines.

Existing vehicular access to the site is via a gated access for agricultural use on the north of Bradmore Way. Bradmore Way is an unclassified public highway and is subject to a 30mph speed limit.

No public rights of way currently route through the site.

### **Site History**

Planning application 6/2021/3583/OUTLINE was submitted in January 2022 for a proposed residential development for 110 dwellings on land at Upper Bell Farm. As part of these proposals, a footpath / cycleway was proposed which routes through land of this application (see drawing 2012-1353-001 in Appendix of document L02-SBD). The Highway Authority recommended no objection subject to conditions and obligations. At the time of writing this response, the application remains undecided.

### **Traffic Impact**

#### **Trip Generation**

The Transport Assessment has predicted the vehicle trip generation of the proposed development using trip rates derived from TRICs. The Highway Authority have reviewed the trip rates and consider them suitable for the residential and care home land uses. This has predicted:

- 70 vehicle trips in the AM Peak hour 0800-0900;
- 68 vehicle trips in the PM Peak hour 1500-1600.

It is noted that a multimodal trip generation has not been undertaken.

#### **Junction & Link Assessment**

The Transport Assessment has included capacity assessment of the Bradmore Way / Brookmans Avenue junction. The results have shown an expected increase in delays and junction performance as a result of the proposed development. The accuracy of these results remain unclear due to concerns regarding the baseline traffic survey, as stated within the top of this document.

Friction of movement for vehicles on Bradmore Way at school times is an issue that must be assessed and suitably mitigated by the development. There are highway safety concerns regarding the potential blocking of the narrow carriageway leading to driver frustration, or inappropriate parking blocking the footway network. The applicant must establish the issues within their TA.

## **Design Considerations**

### **Vehicular Access**

The proposals include the extension of Bradmore Way into the site, as shown on Drawing No. 2012-1353-DWG-214-REV A. The Highway Authority are satisfied with this arrangement and note that the existing lamp column, drains and manholes will need to be relocated as part of the S278 Agreement.

The drawing shows an on-site carriageway width of 5.5m. It is noted this drawing does not show the footway/cycleway shown on Drawing No. 490/20/OUT/SK1200 Rev A. In any Reserved Matters Application, the internal main corridor must provide a 5.5m width carriageway to accommodate any future bus route, and a 4m shared footway/cycleway.

### **Pedestrian and Cycle Access – on site**

The proposals only include pedestrian and cycle access to the site via the extension of the highway from Bradmore Way.

The provision of 2m width footways on both sides of Bradmore Way which lead into the site is considered suitable and in line with standards contained in Roads in Hertfordshire: Highways Design Guide.

As noted in the site history section, planning application 6/2021/3583/OUTLINE was submitted in January 2022 for a proposed residential development for 110 dwellings on land at Upper Bell Farm. As part of these proposals, a footpath / cycleway was proposed which routes through land of this application (see drawing 2012-1353-001 in Appendix of document L02-SBD). The applicant has since submitted Drawing No. 490/20/OUT/SK1200 which shows a 4m width footway / cycleway on an altered route through the site. The Highway Authority are satisfied with the safeguarding of this 4m width route through the site, however note at the following issues must be resolved in the design drawings:

- The 4m width must be a shared surface for pedestrians and cycles to be in-line with LTN1/20 standards.
- The width of the adjacent carriageway for vehicles must be 5.5m width to enable large vehicles such as buses and refuse collection vehicles to simultaneously pass vehicles.
- Detailed Drawings at the site entrance onto Bradmore Way must be provided, which includes a transition for cycles onto the carriageway.

### **Pedestrian and Cycle Access – off site**

As stated within the top of this document, The TA has not included a walking audit of routes to the local facilities and amenities to the south of Bradmore Way where there are local facilities and amenities, the nearest bus stop on Brookmans Avenue, and Brookmans Park Station. From the proposed site, the only route to these facilities is via Bradmore Way, where there are a number of crossings with no tactile pavings, and severance occurs as there is no clear crossing route on a pedestrian desire line from Bradmore Way to westbound bus stops on Brookmans Avenue or to Station Close (to then access the station).

### **Refuse / Servicing / Emergency Access**

The Transport Assessment includes a swept path analysis drawing for a refuse collection vehicle of 11m routing through the site. The Highway Authority note that the Welwyn Hatfield Borough Council use an Olympus Twin Pack, Elite2, L:11.375m, W:2.550m vehicle and therefore updated swept paths will be reviewed once the layout is confirmed at the reserved matters stage.

On the basis that the refuse collection swept path shows an 11m vehicle can route through the site, the Highway Authority are satisfied a fire appliance, which is typically a smaller vehicle, can route

through the site. This will need to be updated and reviewed at the reserved matter stage as the current tracking does not account for the footway / cycleway.

### **Car Parking**

The Transport Assessment notes that 329 residential parking spaces are proposed for the development (including garages). This proposed level of parking exceeds the guidelines set out in the Welwyn Hatfield District Plan Parking Guidance SPD 2004. Whilst the Highway Authority welcome the provision of off-road private parking spaces, there is a concern that this ratio of parking (2.63 spaces per dwelling) is excessive and will create a car dominant development which is not conducive to encouraging active travel and public transport usage.

The applicant has not demonstrated why this high level of car parking is to be provided. At the reserved matters stage, the level of parking should be reviewed. It should be noted that Welwyn Hatfield Borough Council set the car parking standards and therefore the overall decision in the level of parking is a matter for the LPA to determine.

The Transport Assessment states that each dwelling is served by at least one EV Point. The Highway Authority support this provision.

### **Cycle Parking**

The Transport Assessment states 134 spaces will be provided across the site and is based on the Welwyn Hatfield District Plan SPD. The applicant should note that Welwyn Hatfield consider this document to be guidelines as travel patterns have changed since its publication in 2004. Therefore the Highway Authority would recommend the level of cycle parking proposed is maximised for all land uses, as the proposals so far represent a car dominant development. For example, the proposals currently note that:

- Only 3 cycle parking spaces are to be provided for the scout hut. This land use has the potential to maximise active travel.
- One cycle space is proposed per dwelling. Household occupancy typical exceeds this and therefore should be used as a basis to establish the required number of cycle parking spaces.

The location of cycle spaces has not been shown on drawings. Conveniently located and easily accessible cycle parking are key factors in encouraging the uptake in cycling. The details of the cycle parking must be provided at the reserved matters stage. Cycle parking for each dwelling must be secure, covered and well-lit, and designed in line with the best practices set out in Chapter 11 of the DfT's Cycle Infrastructure Design LTN1/20.

### **Sustainable Transport Provision**

The Highway Authority are satisfied the site is within an desirable walking distance to Brookmans Park Primary School, railway station, and local facilities and amenities in the centre.

It is however noted that no bus stops are located within an acceptable walking distance to the site. The closest bus stops are located on Bluebridge Road, approximately 600m from the southern boundary of the site. This exceeds the recommended walking distance of 400m between bus stops and dwellings to encourage bus uptake, as set out in the CIHT's 'Planning for Walking'. Therefore, the off-site improvements as outline at the top of this document and in the Pedestrian and Cycle access sections must be provided in order to provide a route suitable for pedestrians of all ages and abilities.

## **Travel Plan**

The applicant has submitted a Framework Travel Plan for the proposed residential land use only.

The HCC Travel Plan Team have reviewed the Travel Plan and have provided the following comments:

- Two travel plans are required for this development – one to cover the residential element of the development, the other to cover the care home.
- To support the Travel Plans, a Travel Plan Monitoring and Support fee of £1,200 per annum for 5 years (£6,000 subject to indexation Retail Price Index March 2014) is required via a S106 agreement for each land use.

In order to be pragmatic, the Highway Authority have taken the view that the Care Home Travel Plan can be submitted at the S106 Monitoring and Evaluation Stage. At this stage, the Residential and Care Home Travel Plans must incorporate:

- details of a Travel Plan Co-ordinator (TPC) – should they not be appointed as of yet, an interim TPC's details should be noted.
- State whether there is any intention to establish a steering group.
- Please mention Hertfordshire Health Walks under the walking measures section.
- Include detail on the provision of high speed broadband services and promotion of home delivery services to residents, along with any other measures to reduce the need to travel.
- Update baseline figures, following baseline surveys.
- Refresh modal shift targets, after baseline surveys.
- Wording to be altered to reflect that surveys will be undertaken annually, for five years post full occupation.
- TP should be updated annually, please insert text to show this commitment.

## **CTMP**

If planning permission is granted, the Highway Authority request by way of planning condition that a Construction Traffic Management Plan is submitted prior to construction. Due to the sensitive location of the development site, a CTMP is needed to mitigate any adverse impact from the development on the operation and safety of the local highway and footway networks.

## **Planning Obligations**

### **Travel Plan**

As noted in the 'Travel Plan' section above, the application is subject to x2 Travel Plan Monitoring and Support fee of £1,200 per annum for 5 years for the residential and care home land uses (i.e. £12,000 over the 5 year period).

### **Sustainable Transport**

In the absence of CIL, if the application is granted planning permission it will be subject to HCC S106 transport contributions. In accordance with the HCC Planning Obligations Guidance (2021), second strand sustainable transport contributions are sought for residential developments on a unit rate basis of £6,826 per dwelling and £422 per job.

## **Conclusion**

The Highway Authority have reviewed the application and currently recommend refusal due to the issues outline at the start of this statutory consultee response.

Once the above issues are resolved and mitigated, the Highway Authority will be in a position to recommend no objection subject to conditions, informatives and obligations.

**Signed**  
Samuel Tearle

6 July 2022