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To: Planning

Subject: Planning application 6/2019/0882/OUTLINE - Colesdale Farm

Date: 30 May 2019 09:32:37

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Response to Planning application from Hertfordshire County Council (T and CP

GDP Order 2015)

District ref: 6/2019/0882/OUTLINE

HCC ref: WH/122/2019 HCC received: 03/05/2019 Area manager: Nick Gough Case officer: Alan Story

Location

Colesdale Farm Northaw Road West

Northaw Potters Bar EN6 4QZ

Application type Outline application

Proposal

Outline permission for residential development of site of up to 38 dwellings following demolition of the existing buildings and structures with all matters reserved apart from access

Decision

Notice is given under article 18 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that the Hertfordshire County Council as Highway Authority recommends that permission be refused for the following reasons:

- 1) There are discrepancies between the Transport Statement and the submitted plans preventing the Highway Authority from robustly assessing the impacts of the developments in terms of highway safety. The application has failed to provide sufficient information in order that an assessment against Policy 5 of Hertfordshire County Councils Local Transport Plan 4 may be undertaken.
- 2) The proposed access fails to provide adequate visibility splays in accordance with Roads in Hertfordshire. The intensification of use of the access shall represent an increase in risk of collision on a busy, fast Secondary Distributor and is contrary to Policy 5 of Hertfordshire County Councils Local Transport Plan 4.#

Comments:

Outline consent is sought for a proposed development to provide 38 dwellings on land presently provide a commercial / business site. The site presently enjoys two points of access onto Northaw Road West (B156), a Secondary Distributor within the road network. All matters are reserved other than access.

The Highway Authority recognise that this site is also a newly promoted site within the Local Planning Authorities following its' Call for Sites in January and February 2019. It is understood this consultation is ends Tuesday 18 June 2019, the Highway Authority shall

be providing a formal response to this consultation, however this planning application is considered separately.

The planning application is submitted supported by a Transport Statement prepared by M-EC Consulting Development Engineers (April 2019).

Trip rates

The development site is described as presently providing 3130.4m2 of commercial use on the site (Employment / warehousing). The TS is at odds with the Planning Statement in support of the application (DLA Town Planning) which describes that Colesdale farm currently consists of 4,132m2 of buildings, mostly used as commercial units and storage yards, as well as a substantial amount of hardstanding that, with the commercial buildings, make up almost the entire site and the application form (section 16 which states 4132.6m2)

The TS undertakes an assessment of the potential trips that the existing use shall generate, such an assessment has regard to TRICS, for sites located PPS6 out of centre and Edge of Town. It is recognised that TRICs, for this use class, provides extremely limited data on free standing sites. The HA accept, in principle, the use of the sites chosen within the assessment. The TS estimates that the existing use class shall generate circa 0.433 inbound vehicle trips per 100m2 and 0.141 outbound trips in the same period. Applied to the assumed 3130.4m2, the TS predicts that the existing use has the potential to generate 18 two way trips in the weekday AM peak. Use of the same methodology would provide 12 2-way trips in the PM peak.

As identified above – the TS describes a level of existing floor area at odds to that described in the planning statement and application form. If the level of existing floor area is greater than that described in the Transport Statement then the transport statement assumptions are robust, and under estimate the level of trips likely to be generated by existing use. Applying the trip rates to the level of development described in the application form (4132m2) would increase trips to 24 two way trips in the AM peak, and 15 in the PM.

The TS explores the likely impacts of residential use in terms of vehicle trip generation, using the same methodology (TRICS – housing, private owned). I am satisfied with the selection of sites. Applied to the quantum of development proposed (38 dwellings) the Transport Statement predicts that the effect of development shall be to increase vehicle trips associated with the site to 25 trips in the AM peak and 21 in the PM. Such level of change is 7 additional trips in the AM peak, and 9 in the PM peak. Such assessment incorporates the above assumption that floor area on-site is 3130m2, whereas if accepting Planning Statement / Form levels of 4132m2 this changes to 1 additional trip in the AM peak, and 6 in the PM peak.

On the level of vehicle trips generated due to the development, the impacts of these changes would be imperceptible within existing daily flows on the network.

Access

The site presently enjoys two points of access onto Northaw Road West. One, described as titled as Colesdale Barns is placed a described 25m from the junction of Northaw Road West / Northaw Road East / Cattlegate Road. Due to the existing arrangement of this junction (providing a split alignment of Cattlegate Road with the B156) this access may be considered (centre line measurement) as almost directly opposite the junction. The second access is located approx. 80m west of the junction.

The Transport Statement states that; It is proposed that the site will take access via the existing western access on to Northaw Road, with the second existing access (located in

close proximity to the junction with Cattlegate Road) to be stopped up. (para.2.6)

The Transport Statement describes (section 5) that It is proposed that the development will stop up the 'Colesdale Barns' access and retain the secondary point of access off Northaw Road West as the only vehicular point of access to the site, therefore improving highway safety by minimising the number of access points on to the highway network. Such a view is supported by the Highway Authority.

The Highway Authority would observe that the Transport Statement is inconsistent when considered against Proposed Site Plan A_1921 PL100 – which appears to retain the eastern access to Colesdale Farm. Whilst there does appear to be some form of barrier to vehicular access to the residential development at this location (bollards?) this is unclear. Further, whilst the Transport Statement provides details of the revised access to the site, to provide an access road of 4.8m with footways both sides, there are no details on the arrangements for the Colesdale Farm eastern access. The Highway Authority would fully support the closure of this eastern access, given the potential harmful interaction with the existing Cattlegate Road / NRE / NRW junction.

If the access is to be retained, solely to provide access to Colesdale Farm – the Highway Authority would, potentially, have limited ability to resist, but – as a minimum shall require improvements to this access in terms of providing for pedestrian measures across the access. Pedestrian flows along Northaw Road to / from Cuffley would be expected to increase given the access to rail services afforded within a 1.5km walk distance, and therefore measures to improve conditions for pedestrians would be expected.

The applicant should be required to clarify whether the eastern access to Colesdale Farm is to be retained – clarifying the discrepancy between the Transport Statement and arrangements shown on Proposed Site Plan (A_1921 PL100)

The HA would be satisfied, if the Transport Statement is correct, in the application of conditions requiring the eastern access to be closed permanently to vehicular traffic and reinstated to the same line, level and construction as adjacent footways, and imposition of an outline condition requiring full details in the form of plans of improvements to the retained access as well as full swept paths, including those necessary for vehicles to access Colesdale Farmhouse via internal roads, as a pre-occupation condition.

Visibility from the proposed improved access is shown on drawing 24794_08_020_01 (appendix F to the TS) and shown as 2.4m x 45m to the west and 2.4m x 63m to the east. Reference is made in this drawing that such splays are appropriate for the assessed 85th %'ile for Northaw Road West, with this drawing annotated to suggest that the TS details such speed assessment.

HCC sets out its approach to visibility splays within Roads in Hertfordshire – Design Guide, 3rd Edition Section 2. It states that the status of a highway within the Road Hierarchy is a strong indicator of its function. Primary and Main Distributor roads (A and B class roads), carry large volumes of traffic and freight. In general, the standards set out in DMRB should continue to be used on roads which are classified as Primary or Main Distributor roads, and other routes subject to large volumes of traffic.

It goes onto say that at locations on Primary or Main Distributor roads where it can be satisfactorily demonstrated that the 'place' function outweighs the 'movement' function (i.e. the characteristics of the highway and built environment are such as to warrant design considerations from MfS) it is logical to apply the recommendations of MfS. MfS recommendations should only be used on roads with 37.5 mph (60kph) or lower actual (85th percentile) speeds. When traffic speeds on a high-class road are less than 37.5 mph

and it has significant 'place' function, then it is reasonable to apply the recommendations of MfS in terms of visibility and layout.

Whilst the TS provides evidence that 85th %'ile is beneath 37.5mph, it shall be difficult to argue that the characteristics of Northaw Road West at this location are anything other than serving a "movement" function. Whilst the existence of the access cannot be ignored, it is substandard in terms of visibility. The proposals create a new access (albeit at loss of existing), however, such access should be provided in a safe manner.

Vehicle speeds on NRW presented within the TS have regard to ATC data from the County Councils own apparatus (site 478401), this site is located approx 330m east of the junction of Cattlegate Road with NRW / NRE. As such this count site is in a position that does not compare with the application site. Vehicles at count site are either aware of the approach of the Cuffley urban area or have recently left it, with vehicle speeds within the urban area subject to 30mph limit and subject to speed management arrangements. The topography of NRW outside the site has a notable gradient, no active frontages and therefore the Highway Authority consider that vehicle speeds at the proposed access are significantly greater than presented within the TS.

The above situation directs that there is insufficient evidence that the use of MfS standards is appropriate. The proposals fail to provide visibility from the proposed access to DMRB levels. Whilst levels of intensification of use (above) are low, there is sufficient intensification that the access shall require improvement to provide a safe connection with the Secondary Distributor. Such a view is supported by the fact that there is a cluster of accidents at the junction of NRW / NRE / Cattlegate Road. Whilst many accidents suggest that causative factors were not speed related, there are sufficient accidents involving inappropriate speeds to support the view that the use of the selected ATC count site is inappropriate for use within this matter.

The Proposed, indicative site plan, provides no relationship between the proposed dwellings and Northaw Road West, and therefore does nothing in terms of changing the nature of Northaw Road West at this location such that the place / movement function at this location changes. The reasonable isolation of this site supports that the likelihood of NRW being considered as having a 'place' function is low.

Sustainability

The site is located 1.5km from Cuffley Railway Station, with the centre of Cuffley and primary school provision (Cuffley School) beneath this distance. The site is 1.8km from centre of Northaw Village, with primary provision in this location also (Northaw C of E). It is noted that Crews Hill is circa 2.28km from the site, however, such routes are not provided with footways and noting the distances involved and that Cuffley / Crews Hill are on the same line, it is envisaged that there is no likely attraction to Crews Hill station.

Whilst the IHT Guidance for Providing for Journeys on Foot directs that distances of 1km are usually considered acceptable for Commuting / School walking trips but recognises a preferred maximum of 2000m for such trips. Accessing rail services (as well as school and shopping opportunities) is within an 18 minute walk of the site, and would be considered acceptable. The Highway Authority would support (above) retention of pedestrian routes within the site emerging at the point of the existing eastern access, but would – above – require such routes to interact safely with any retained access for the Farmhouse. The applicant is directed to note that the Couynty Council sets out its' approach to planning obligations within its' guidance available here; https://www.hertfordshire.gov.uk/media-library/documents/environment-and-planning/planning-jn-hertfordshire/planning-obligations-toolkit-for-hertfordshire.pdf

It would be appropriate to observe at this time that any scheme found to address the above concerns shall reasonably be required to make a second strand contribution in accordance with this guidance towards measures to support and promote the use of non-car based modes of travel.

The site is fronted by bus stops E/W. Such stops are served by route 242, providing approximately an hourly service (greater in the peaks). Bus stops are flag only, and shall require improvement to provide easy access to public transport.

Footways exist linking the site to local population centres (Cuffley). Such footways are continuous on the north side, limited in width. Opportunities exist to improve pedestrian conditions, this may be siding out existing vegetation / verge encroachment, or potential improvements along the length.

Alan Story Date 30/05/2019

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