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## **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: 6/2023/1221/OUTLINE  
HCC ref: WH/18059/2023  
HCC received: 29 August 2023  
Area manager: Manjinder Sehmi  
Case officer: Senober Khan

### **Location**

Brookmans Park Golf Club Golf Club Road Brookmans Park Hertfordshire AL9 7AT

### **Application type**

Outline

### **Proposal**

Outline permission for the erection of 14 dwellings, 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 for the following reasons:

The Highway Authority under the current submission cannot support the outline application with all matters reserved except for access, due to the application has failed to demonstrate a satisfactory policy and design-led approach to the vehicle access contrary to Hertfordshire's Local Transport Plan (LTP4) policies 5 and 6 and also contrary to the principles of sustainable development contained in the NPPF, therefore the proposals represent a risk to highway safety for all road users.

### **Brief Description of Proposed Development in support by the applicant:**

A Transport Statement (TS) has been submitted to consider the transport impacts relating to a proposed residential development of 14 dwelling (Use Class C3) together with associated car parking.

The purpose of the TS is to establish the multi-modal trip generating potential of the residential development proposals to assess the associated impact on the local highway and transport networks over the course of a typical weekday, as well as during the AM (08:00 – 09:00) and PM (17:00 – 18:00) peak hour periods. It further assesses the proposed access, parking, delivery, and servicing arrangements in light of various national and local planning design guidance publications.

An area encompassing Golf Club Road, Brookmans Avenue, George's Wood Road, Mymms Drive and any roads contained within those named above was designated as a suitable study area for analysis of incidents recorded.

Within this area, a total of 10 slight incidents were recorded. There were no serious or fatal incidents recorded. Of these incidents, 2 involved pedestrian casualties and 1 incident involved a cyclist casualty.

There were no recorded incidents along Golf Club Road, Brookmans Avenue and George's Wood Road which will be the most likely routes for all future end users of the development travelling to and from the site east and west.

The site is located in a semi-rural area hence there is not a significant level of pedestrian or cycle infrastructure directly available from the site. Golf Club Road is a minor road with its purpose to serve the Golf Club and a small number of units on Ash Close. As the road serves less than 50 dwellings it can be classified as a shared street which from the 10mph informal speed limit and 4.1 minimum carriageway width fits within the standards of the Hertfordshire Design Guide. Golf Club Road and The Drive are noted on the Hertfordshire Public Rights of Way Map as FP North Mymms 068.

Footways are present along the northern side of Brookmans Avenue for pedestrians travelling towards Brookmans Park Village. The construction of the footway varies along the length of Brookmans Avenue as footways have often been constructed as part of wider works for individual dwellings. The footway runs adjacent to units and is separated from the carriageway by wide grass verge.

In accordance with the Roads in Hertfordshire Highway Design Guide, for residential developments under 50 dwellings, the proposed vehicular access will be by means of a shared surface street served off the existing Golf Club Road to be provided with a 4.8m width.

As discovered from the results of the ATC survey, vehicle speeds on Golf Club Road exceed a safe environment for walking and cycling on Golf Club Road. Therefore, to retain the shared space environment, speed calming measures are proposed for a section near to the site.

Golf Club Road will be clearly marked as a shared surface road with signage showing speed restrictions of 20mph that will be put into place. To ensure that vehicles are not exceeding these speeds, it is proposed that speed humps will be installed along Golf Club Road including a raised table feature at the site's access to further reduce vehicle speeds.

In addition, a priority road narrowing feature will be installed at the northern end of the site dwellings' frontage onto Golf Club Road. The give way feature will be humped and will give priority to road users travelling north.

In line with guidance on visibility splay requirements for junctions set out in the Department for Transport's (DfT's) Manual for Streets 1 & 2 publications (2007 & 2010), visibility splays of 2.4m (x-distance) by 25m (y-distance) have been and can be achieved within land owned by the applicant.

An enhancement to the pedestrian access to the Chancellor's School by providing 2 x reflective bollards to increase awareness between pedestrians and vehicles, whilst, subject to agreement with the school it is proposed to cut back hedgerows to further increase intervisibility. The position of the raised table surface treatment whereby access is gained to the southern development parcel has been positioned to the north of the school access to ensure level access is maintained.

The standards for car parking for the development are applied based on zone 4 standards.

- 1 Bedroom Dwellings – 1.25 Spaces Per Dwelling
- 2 Bedroom Dwellings – 1.5 Spaces Per Dwelling
- 3 Bedroom Dwellings – 2.25 Spaces Per Dwelling
- 4 Bedroom Dwellings – 3 spaces Per Dwelling

Cycle parking standards for residential dwellings are 1 long term space available per household unless a shed or garage is available. The units will each have sheds to store bicycles in.

Swept path analysis demonstrating that a refuse vehicle is able to manoeuvre to and from the site in forward gear. A turning head is provided within the southern section of the site, whereby upon reversing no greater than 12m beyond the vehicles natural path, a position is reached which affords access to within 25m of all units to meet Manual for Streets standards for operative drag distances. Bin collection locations will be within 30m of dwellings.

For the purpose of providing a robust assessment of potential trip generation associated with the proposed development, the TRICS sub-category 'Houses Privately Owned' has been adopted.

To determine the likely multi-modal trip generating potential of the development proposals, the total person movements of the residential use have been cross referenced with 'Method of travel to work' data from the 2011 Census for the 'Welwyn Hatfield 015A ' Lower Super Output Area (LSOA) within which the site is located.

It is evident from reviewing census data that 62% of all households living within the area surrounding the site typically travel by private car for their journey to / from various workplace destinations. 24% of commuters regularly travel by public transport, with 20% travelling by train and approximately 10% travel by the 'active' modes of walking and cycling.

Of the 108 total two-way person trips over the course of a typical weekday approximately 67 trips would be undertaken by private car, 26 by public transport, and 11 by the 'active' modes of walking and cycling.

The development proposals would have the potential to generate in the order of 11-13 two-way person trip movements during the AM (08:00 – 09:00) and PM (17:00 – 18:00) peak hour periods. Of these, approximately 7 would comprise private car trips. There would be 3 two-way trips expected to be undertaken by public transport in each peak with a very small number undertaken on-foot and by cycle in each peak period.

In Summary, this report demonstrates that:

- The site is well located in respect to local public transport offerings from Brookmans Park which offer good connectivity to local and regional destinations. There is also reasonable access on-foot and by bicycle to amenities situated within Brookmans Park village.
- Results of an ATC survey indicate that speeds along Golf Club Road were 29.5mph and 30.1mph which is in excess of the advised 10mph limit but circa the 30mph posted limit.
- Results of the multimodal survey showed a total of 375 two-way vehicle movements between 07:00 and 19:00 on Golf Club Road past the site, of which 44 movements were recorded during the AM Peak which is well within the operational capacity of a shared space street. In addition, a total of 394 pedestrian movements were also noted, primarily associated with access to Chancellor's School.
- The proposed access arrangement is considered suitable with the internal layout designed as shared space in accordance with the Roads in Hertfordshire Design Guide. The required level of

visibility, in combination with the speed calming measures ensures that car drivers would be afforded sufficient intervisibility with other motorised and non-motorised users, thereby enabling safe manoeuvres to be undertaken at the site's access.

- Speed calming measures on Golf Club Road including speed humps, a raised table feature at the access and a priority road narrowing feature are proposed to reduce the typical 85th percentile speeds of vehicles below 20mph, whilst enhancing experience in terms of safety and accessibility for those using the shared space arrangement for walking and cycling.
- Enhancements will also be made to the gated pedestrian access to the Chancellor's School to improve conditions for pedestrians on Golf Club Road.
- The development would generate an insignificant number of movements over a typical weekday and during the AM and PM peak periods by all modes. These movements, in conjunction with the existing volume of vehicle usage along Golf Club Road and the surrounding road network would not have a material impact on the operational and safety characteristics of the local highway and on transport networks.

### **Highways comments:**

The applicant is seeking outline planning permission for up to 24 dwellings with all matters reserved except means of access.

The proposed car parking provision and layout is the responsibility of the LPA to determine the level and suitability of the car parking proposals, however, it is essential that it is operated in efficient and safe manner to minimise the impact on the local highway network which is the responsibility of the HCC HA.

The application seeks planning permission concerning the means of access with all other matters reserved.

The main points in the Transport Statement (TS) in support of the proposals concerning the access and the HA's response are as follows:

Whilst pedestrians can walk within the carriageway along lightly trafficked roads, it is not clear if this is a suitable option for this site, nor if it realistically provides suitable access to all. Also no information/data/survey has been provided to substantiate that the road is lightly trafficked (MfS) and how it will remain so given there is a nearby school which generates vehicular traffic on a regular basis.

The TS itself mentions both local and national policies and guidance's relating to sustainable travel by walking, cycling and public transport, however nothing substantive has been proposed which will promote active and sustainable travel.

With new builds the planning process seeks/provides the opportunity to improve conditions for both development and highway safety by applying current higher standards of policies, design, accessibility, and safety to new developments, and not to retain and/or continue with past obsolete standards.

Cycling and walking are a key part of HCC/NPPF plans, the HA expects provision of safe footway to the vehicle access of the proposed site which is one of the key issues identified in HCC/NPPF to encourage active sustainable transport choices.

Accesses in new builds should adhere to current higher standards of accessibility as outlined in both local and national policies, guidance's, and regulations.

The none provision of footway and expecting residents to walk along the carriageway of Golf Club Road is not acceptable for a new build development exacerbated by the fact that Golf Club Road has no street lighting adds to the risks, especially when it gets dark earlier in the evening in the autumn/winter.

Whilst it is acknowledged by the HA that the development cannot provide the required footways that are needed in the interests of highway safety along Golf Club road to ensure vulnerable users have access to safe facilities that encourage active travel and ensure the site is accessible for all vulnerable users, however, the applicant can provide 2m footways along the sites full length of its frontage with Golf Club Road, it would not only ensure optimum unobstructed visibility splays but also provide some refuge and safety for pedestrians/children to walk along/wait. It also provides the opportunity to continue the footway along any future developments that may develop along Golf Club Road and beyond, that would otherwise be lost for future improvements for pedestrians and cyclists.

As mentioned above It's a new build development therefore higher standards of design, build and safety are required to new developments, the provision of 2 vehicle accesses for a relatively small development (14 units) is unnecessary or justified. The HA will not support a second vehicle access serving the same site, this is to reduce the potential for more conflict points between pedestrians and vehicles and vehicles and vehicles and provide greater provision of footway for pedestrian safety.

The swept path drawings show that the proposed vehicle access bellmouth would be very tight for refuse vehicles to make the turning manoeuvres, with very little margin of error and will be kerb to kerb, making it very difficult for refuse vehicles to turn into and out of the site in one move if error in turning is made requiring multiple manoeuvres to turn. The HA feels this is likely to require the proposed vehicle access to be set back into the site in order to provide the required depth needed to show a vehicle will be able to turn and egress from the bay in forward gear with at least 0.5m clearance between the track and the kerbs.

The applicant is proposing to install traffic calming measures along Golf Club Road to reduce speeds due to the road being a shared surface, whilst this is welcomed by the HA however the traffic calming measures are also required from Golf Club Roads junction with Brookmans Ave to ensure pedestrians have a safe environment in which to walk, and not just opposite the sites frontage.

#### Summary:

It is reasonable to assume the proposal would result in the residents having a reliance on the private motor vehicle for even the most basic of daily needs, thereby conflicting with the aims of achieving development in sustainable locations.

Pedestrian route to the development access must also consider the needs of those with small children, pushchairs and those with reduced mobility, including visually impaired people and people using wheelchairs or mobility scooters (Equalities Act).

Consequently, the site and its access without the provision of safe and lit footway connectivity with established settlements and public transport are not considered acceptable for residential development in such an location because it is not viable for access by non-car transport modes contrary to all policies and guidance's, in particular NPPF which seeks new development to provide safe and suitable access for all, and to create safe and secure layouts minimising conflicts between traffic and pedestrians.

A Stage 1 Road Safety Audit (RSA) for any revised access proposals will need to be submitted as part of application with particular attention to pedestrian routes and safety.

**Recommendation:**

The Highway Authority under the current submission cannot support the outline application with all matters reserved except for access, due to the application has failed to demonstrate a satisfactory policy and design-led approach to the vehicle access contrary to Hertfordshire's Local Transport Plan (LTP4) policies 5 and 6 and also contrary to the principles of sustainable development contained in the NPPF, therefore the proposals represent a risk to highway safety for all road users.

**Signed**

Senober Khan

22 September 2023