

1905-084/RJM/02
25 June 2019

For the attention of the Case Officer
Welwyn Hatfield Borough Council
Council Offices
The Campus
Welwyn Garden City
AL8 6AE

25 Southampton Buildings
London
WC2A 1AL

020 3709 9405
london@tpa.uk.com
www.tpa.uk.com

Planning reference: 6/2019/0218/LB

Dear Sir,

**Northaw House, Coopers Lane, Northaw, Potters Bar EN6 4NG
Letter of Objection**

Transport Planning Associates has been retained by [redacted] of East Lodge, Judges Hill, Northaw, EN6 4NL to provide transport and highways advice in connection with the proposed development at Northaw House. Whilst our client has no objection to the redevelopment of the site in principle, he is concerned about the intention to re-open the former trafficked route across the site that was served by the existing access at East Gate on Coopers Hill. The purpose of this letter is to object to this element of the proposed development.

Background

Based on the information listed on the planning portal, it is understood that it is intended to redevelop the existing site from its current office use (approximately 1,790 m² of Land Use class B1a) to provide a total of 27 residential units as a mixture of new build and conversion/refurbishments. This would comprise:

- The conversion/refurbishment of:
 - Northaw House to form 11 apartments (including the refurbishment of an existing single caretaker's flat);
 - The Ballroom Wing to form 2 dwellings;
 - The Stable Block to form 1 dwelling; and
 - An existing dwelling at Oak Cottage;
- The construction of:
 - 2 Gate Lodge dwellings;
 - 3 dwellings within the Walled Garden; and
 - 7 dwellings within the Settlement Area,

Review

Use of accesses and vehicle demand

The Design and Access Statement (DAS) prepared by Waller Planning (January 2019) in support of the planning application considers access to the site at Chapter 5. It notes at ¶ 5.1 that:

“There would be pedestrian access to the site from both the east and west entrances, which would be linked by the historic route which runs through the site’s centre. The east entrance would provide the most direct route to the adjacent village of Northaw, whilst the western access provides a pedestrian route to Potter’s Bar. The edge of Potter’s Bar is around 10 minutes’ walk from the site’s western entrance, whilst the town centre is around a 2km walk. An easy 5km cycle ride would place residents within reach of the whole of Potters Bar, Brookman’s Park and Cuffley, as well as a large area of the local countryside.

In terms of vehicular access, the DAS notes at ¶ 5.12 that:

“At present the application site is accessible by vehicle from an access point off Cooper’s Lane at the site’s western boundary. The eastern access would only be available for pedestrians”.

At ¶ 5.13, the DAS discusses the existing use of the western access and highlights the reduction in vehicle trips that would be expected as a result of the proposed change of use. It also states that there have been a total of 3 personal injury collisions in the vicinity of the western access in the last 10 years, noting that a reduction

“... means that there is no problem with accidents at the access”.

Nevertheless, the DAS describes measures to improve the layout of both the western and eastern access points; measures that have been discussed with Hertfordshire County Council as part of the pre-application process.

Turning to the supporting Transport Statement (TS) prepared by KMC Transport Planning in December 2018, this notes at ¶ 4.7- 4.10 that:

“The vehicle access for the extant office use of the site was solely via the western access with all traffic entering and exiting the site to/from Coopers Lane. However, the east and west accesses from Judges Hill and Coopers Lane, respectively, have always been operational, albeit over recent years the eastern access has only been used by the Eastern Lodge, which lies just outside of the redline boundary.

Originally the internal access road to Northaw House connected the east and west accesses. However, over time a section of the internal access road was taken out of use. It is proposed to reinstate this section of internal access road”

..... will enable residential traffic to access and egress the site from both the east and the west. This will act to disperse traffic onto the highway network and provide pedestrian access to the local facilities within Northaw village.

It is envisaged that the eastern site access will only be used for travelling to and from the east and that the western access will be used for travelling to and from the north and west, due to these routes being the most direct”.

Improvements to accesses

The DAS and TS also refer to proposed improvements to the two accesses, even though it has been established at ¶ 5.14 that there *“is no problem with accidents at the access”*. The improvements have been derived to address the findings of a Stage One Road Safety Audit that was undertaken by Go Surveys Limited in May 2018.

These improvements, which are *“.....intended to enhance safety”*, formed part of the pre-application discussions with Hertfordshire County Council and comprise the following:

- | | |
|----------------|---|
| Western access | <ul style="list-style-type: none">• reducing the width of the western access junction mouth• the reinstatement of the centre line road markings• the reinstatement of SLOW road markings on the approaches to the access |
| Eastern access | <ul style="list-style-type: none">• Removal of the worn mini-roundabout road markings and associated warning signs• Replacement centreline road markings• Introduction of give way markings to create a priority junction |

Beyond a number of swept path plots of a large refuse vehicles entering and leaving the two accesses (which would be likely to take place once every week) that are included in the TS, there is no evidence to show how suitable these proposed changes are when considering the passage of either a car or delivery vehicle. By way of example, a car wishing to turn left out of the eastern access, could not do so without crossing into the path of oncoming traffic, yet there is no reference to a left turn ban as part of the proposals.

Similarly, a car turning left into the western access may find this a difficult turn that required the partial use of the exit lane when making the turn. Deliveries by 8 m long rigid service vehicles would also be difficult from the west at the eastern access and from the east at the western access where the whole access width would be required to enter the site. While this is an existing issue at the western access, the proposed change of use to residential might be expected to increase the number of such movements.

Commentary

The points noted above serve to highlight a number of issues. Firstly with regard to the suggested use of both accesses, the statement in the TS is at odds with the DAS where, as noted above, it states, albeit indirectly, that only the western access would be used for vehicular use. The DAS also states that the western access would be less used as a result of the proposed residential development than existing.

Secondly, the TS states that the internal access road was “over time” taken out of use. It is our understanding that this section of road has not been in use since the 18th Century and, beyond a track that extends across grass between two farm gates, is no longer visible as a made road. To that end, the eastern access is only used

by our client and by the owner of Stud Farm House, who on occasion, uses the access to move farm machinery.

Thirdly, if the argument made in the DAS is correct in that the western access will be less used following the redevelopment of the site, then there is no highway or capacity reason why it would be necessary to seek the reintroduction of an internal vehicle link across the site.

Examining this latter point in further detail, the TS at Chapter 5 considers traffic generation associated with the existing and proposed uses. The net reduction in traffic generation, based on the use of trips rates derived from the TRICS database or supplied by Hertfordshire CC is summarised in Table 5.5 of the TS and this is reproduced below:

Table 5.5: Net Vehicle Trip Generation

Vehicle Trips	AM Peak (0800-0900)			PM Peak (1700-1800)		
	In	Out	Two-way	In	Out	Two-way
Extant Trips	-47	-5	-52	-4	-40	-44
Proposed Trips	3	10	12	8	4	12
Net Change	-44	+5	-40	+4	-36	-32

As can be clearly seen, the proposed residential redevelopment of the site is predicted to result in a significant reduction in vehicle trips to and from the site. Indeed, at Chapter 6, the TS states at ¶ 6.1 that:

“As part of the pre-application consultation with HCC it was agreed that the proposed development would generate considerably less vehicular trips in both the AM and PM peak hours than the extant use. There will therefore be no impact on the highway network”.

And yet, notwithstanding this, the TS goes onto state in the same paragraph that:

“In addition, the proposed development is to utilise both the eastern and western site accesses, which will further disperse traffic onto the highway network”.

However, there is no justification provided for this statement, other than to note that the traffic flows, such as they are, would be dispersed.

In our view, the TS provides conflicting information. It notes that the existing access does not have a significant safety issue, with 3 personal injury collisions occurring over a 10 year period. It also notes that existing traffic flows at the western access, which, in the past and at present, forms the only means of access to the site as a whole, would be higher than the predicted flows associated with the proposed redevelopment. Finally it suggests, for no reason other than to disperse traffic flows, that both accesses should be used.

Yet both accesses would only be required to disperse what would already be a reduced flow. Given that the proposed scheme would have no detrimental impact on traffic conditions, and thus no significant impact on the

highway network, it is not clear why the use of the eastern access has been suggested. Furthermore, it is clearly not the case that an overarching need has been either shown or a strong case made for the vehicular use of the eastern access and the reinstatement of the internal access road. In addition, the suggested use of the eastern access would add to the potential risk of accidents on Judges Hill, where it can be clearly seen that a single access would be sufficient to cater for the predicted demand associated with the proposed residential development.

The proposed changes to the two accesses to address Road Safety Audit comments may serve to create further issues in terms of car and delivery vehicle access given that there is no suggestion to introduce banned turns at the two accesses. Also, the findings of the TS do not concur with those of the DAS, and in particular where the DAS notes that the eastern access would be used by pedestrians. The suggested use of the eastern access for pedestrians (and ideally cyclists), would be an entirely reasonable proposition and one that would help to support the sustainable element of the proposed scheme.

Conclusion

In conclusion therefore, and on behalf of our client, it is our view that there is no overarching reason or clear justification why the existing eastern access should revert to a vehicular access to serve the wider site. In that regard, the DAS and TS are not in agreement over the proposed means of accessing the site by car.

As plainly shown in the supporting TS prepared by KMC Transport, the proposed redevelopment of the site would result in a reduction in traffic. Such a reduction would therefore have a positive rather than negative impact on the immediate highway network in the vicinity of the site. The proposed scheme cannot not therefore be considered to have a significant adverse impact that might otherwise be the trigger for providing additional traffic capacity to ameliorate any such impact.

Similarly, the western access does not have a poor accident record with only 3 personal injury collisions being recorded over the last 10 years. As stated in the DAS, the predicted reduction in traffic as a result of the proposed redevelopment of the site would mean that "... *there is no problem with accidents at the access*". Introducing a second access for a scheme that will result in a significant reduction in generated traffic is therefore counter-intuitive and could be considered to pose an additional highway risk that cannot be justified.

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For these reasons and on behalf of our client, we wish to object to the planned reuse of the eastern access road as a vehicular means of accessing the redeveloped site.

Yours faithfully

RJ Morrison

Richard Morrison
Associate Transport Planner
Transport Planning Associates

