Ann Helmke

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Sent: 26 July 2019 15:37

To: Planning

Subject: Planning application 6/2019/1370/MAJ - Land to the east of Firs Wood Close

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

District ref: 6/2019/1370/MAJ **HCC ref:** WH/185/2019 **HCC received:** 11/07/2019

Area manager: Manjinder Sehmi

Case officer: Alan Story

Location

Land to the east of Firs Wood Close Northaw EN6 4BY

Application type

Full application

Proposal

Erection of 26 dwellings and associated 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) The application site, by nature of its' location, fails to promote opportunities to travel by non-car based modes of travel and fails to provide safe and suitable access for all users, and it therefore considered contrary to Policies 1 and 5 of the Hertfordshire Local Transport Plan 4 (2018) 2) The application has failed to robustly assess the likely level of vehicle trips to be generated by the proposed development.

Comments:

Firs Wood Close is a private maintainable road, accessed from Coopers Lane Road. Coopers Lane Road is an unnumbered classified road subject to national speed limit, and serves as a secondary distributor within the Hertfordshire road network. Development proposals provide 26 new residential units following formation of a new access onto Coopers Lane Road.

Development proposals are submitted accompanied by a Transport Statement – Milestone Transport Planning May 2019.

Access

The proposed access is onto Firs Wood Close. As a consequence the works are beyond the ability of the Highway Authority to control, however, I can confirm that the proposed access road – for the level of development proposed appears excessive. The width proposed is 6m, and commonly a width of 4.8m would be appropriate for a minor access, but recognised that 5.5m provides more appropriately for need for vehicles to pass clear of each other. Visibility from the access is provided commensurate for a design speed of 30mph, and it is unlikely that speeds within Firs Wood Close exceed this limit.

Firs Wood Close is not provided with consistent footways within, and whilst the proposed access with footways shall be provided, they do not link to any wider network.

Trip rates

The TS predicts that the proposed housing will generate 28 peak hour (AM) person trips, representing 22 outbound trips and 6 arrivals. I do not consider that the selection of sites used in the TRICS assessment are reasonable. Whilst the TS has elected to consider Edge of Town locations, the application site cannot be considered as Edge of Town, and would be free standing at best. A review of sites within TRICs confirms that sites are within an urban environment and connected by lit routes to footways and within reasonable walk distance of shops / services and bus routes.

The TRICS assessment presented within the TS has regard to multimodal trips. Results for main modes only are presented as well as person trips. Person trips are of limited benefit in reliance upon. The proposed 26 dwellings are predicted as generating 14 vehicle trips in the AM peak, however, the modelling suggests that 4 trips would be by pedestrian and 1 by public transport. As set out in sustainability below the site is considered inaccessible by modes other than the car, and therefore all person trips would be considered by the Highway Authority as being car based.

The Transport Statement does not present a robust assessment of modes of travel, having regard to survey sites within TRICS that are incompatible with the location of the proposed development.

Sustainability

The site is located 886m walk distance from the very outer limits of Potters Bar. Bus stops (served by route 242) are 1.3km from the site (The Causeway). Potters Bar High Street (for shops and local services) is 2.24km from the site. Potters Bar Railway station is 3.4km from the site.

Coopers Lane Road features footway provision (to one side only (S)) for a distance of 500m (approx) from junction of Springfield Close, before ceasing. The site is a further 440m from this point (on opposing side of the carriageway). There is therefore no footway provision to the site.

Coopers Lane Road is an unnumbered classified road providing a secondary distributor function with the Hertfordshire hierarchy of roads. Vehicle speeds past the site are subject to a 60mph posted speed limit.

The existing carriageway would not be conducive to safely accommodating pedestrians.

The site is in reasonably close proximity to Bridleway Northaw 010, a public right of way. This is unlit, providing a variety of surfaces along its' length (concrete / loose crushed concrete and tarmac road plainings). This route (subject to improvement along its' length, outside of the red line of the application) would potentially enable transition to the village of Northaw, however bus services to Northaw Village are limited, as well as choice of local shops and facilities being limited. Existing bus services (route 242) to Northaw are understood as being reviewed presently, with likely cuts to frequency of service. The distance from the site to Northaw Road west via Northaw 010 is above 1km and therefore concerns remain over the potential improvement any localised improvements to this route would have on the overall sustainability of the site. HCC would seek to encourage bus stops within 400m of residential development, and walk distances each exceed limits recommended by the Institute of Highways and Transportation (IHT) within

their guidance 'Providing for Journeys on Foot'. All distances (Town Centre / Commuting / Elsewhere) significantly exceed the desirable, acceptable and preferred maximum distances.

The TS recognises that bus stops are 1.3km away from the site, but has little regard to the conditions of the route. It recognises that services are limited.

The TS identifies that the site is within an acceptable cycle distance from main urban areas (Potters Bar / Cuffley) and rail services at this location. For its' length Coopers Lane Road is 60mph. Whilst the Highway Authority would not suggest that it is inaccessible by cyclists, it would require a proficient cyclist and absence of footways limits the ability for cyclists to take refuge in case of mechanical breakdown or wide vehicles passing each other.

The TS (2.19) identifies that Firs Wood Road is a residential cul-de-sac that links the site to Coopers Lane Road which is the key highway route that provides a good level of connectivity to a number of local destinations, however such connectivity can only be accepted as 'by car'.

Hertfordshire County Councils Local Transport Plan 4 (2018) directs that (Policy 5) The county council will to work with development promoters and the district and borough councils to Ensure the location and design of proposals reflect the LTP Transport User Hierarchy and encourage movement by sustainable transport modes and reduced travel demand. Policy 1 of the LTP4 introduces the Transport User Hierarchy which supports the creation of built environments that encourage greater and safer use of sustainable transport modes. The county council will in the design of any scheme and development of any transport strategy consider in the following order: • Opportunities to reduce travel demand and the need to travel • Vulnerable road user needs (such as pedestrians and cyclists) • Passenger transport user needs • Powered two wheeler (mopeds and motorbikes) user needs • Other motor vehicle user

The Transport User Hierarchy represents a shift in emphasis to increase rates of travel by more sustainable modes than previous LTPs. The policy applies to both the scheme design process and the formulation of transport strategy. The policy is not anti-car and car use is recognised as being an essential part of the county's future transport system. Instead it seeks to increase the attractiveness of alternative forms of travel, so that those trips that can only feasibly be made by the car can be undertaken without suffering the effects of a significant worsening of congestion.

This approach is consistent with the NPPF, particularly paragraph 102 and 108 that opportunities to promote walking, cycling and public transport use are identified and pursued through development proposals and that appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location; and safe and suitable access to the site can be achieved for all users.

The absence of footways between the applicant site and bus stops / rail / shops and services present significant concerns that safe and suitable access to the site cannot be achieved for all users. The HA does not dispute the presence of the Right of Way (Northaw 010) but that this route is not suitable for all users, particularly for those with a mobility impairment, or at night given the dark and isolated nature. The RoW does not serve to offer significant utility regardless of these concerns, with limited facilities available via this route and given the significant distances involved.

Date 26/07/2019

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