



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: 6/2023/0241/COND
HCC ref: WH/15711/2023
HCC received: 30 March 2023
Area manager: Matthew Armstrong
Case officer: Matthew Armstrong

Location

Land to the north east of King George V Playing Fields Northaw Road East Cuffley EN6 4RD

Application type

Discharge of Condition

Proposal

AMENDED PROPOSAL

Submission of details pursuant to condition number 4 (Construction Environment Management Plan (CEMP), on planning permission S6/2015/1342/PP

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 recommendation. In the absence of the necessary information, the Highway Authority recommends refusal due to doubt over possible implications for the free, safe and sustainable flow of public highway users.

COMMENTS:

A revised CTMP has been submitted to try and overcome our concerns.

Paragraph 6.1.2 speaks of "all construction traffic (except for very local traffic) will approach the site from M25 Junction 24". We queried the definition of "very local traffic" and this is now defined "as any traffic that would need to travel away from site to reach M25 before returning via the route identified in. We continue to query this: if "very local traffic" is still traffic that needs to reach the M25, then why can it not also use the main route identified?

As mentioned before, much of the proposed construction traffic route is outside of Hertfordshire, within the boundary of the London Borough of Enfield. Therefore, if they have not already, the LPA should consult the London Borough of Enfield on this CTMP for their views too.

In section 6.14 there is still not a commitment to ensuring no deliveries during school opening and closing times, Instead wording has been added to say "the number of vehicle movements and surrounding traffic conditions which could disrupt vehicle transit times beyond the operator's control may mean deliveries avoiding peak school hours is not always achievable". This is not a reason to not commit to no-deliveries during school opening and closing times, and indeed it is pragmatically accepted that on rare occasions there may be the odd delivery during such times due to unforeseen traffic conditions on the wider network. However, the general commitment should be to ensuring no deliveries during school opening and closing times to protect some of the most vulnerable public highway users who are on the network at the same time.

Section 6.8 - There is a bit more sustainable travel options in the form of a car share database. There needs to be a commitment to one person managing this (e.g. site manager), and furthermore it would be beneficial if there was a commitment to all workers being provided information of nearest bus and rail options.

Section 6.16.1 states "at least two weeks prior to the commencement of works a photographic survey" will be undertaken. This is good, but there should be an end period stated too for the 'after' survey (e.g. within 2 weeks of completion). It also mentions period inspections which is again good, but knowing the frequency of these would be good.

Section 9.2.2 now states that "within one calendar month of start of works, an introductory letter will be issued to all existing dwellings near to the site", and section 9.2.3 states "Further update letters will be issued to the same parties before major project events". This is all accepted.

Section 6.3 now states that a minor works licence is being applied for to create a temporary access in advance of the permanent s278 access. The temporary access will be at the same location of the permanent access, and consideration of this (including safety design checks) can be progressed by our Implementation team.

However, this section of the CTMP still proposes to use the 'existing' access in advance of this, which marks the start of public right of way (Northaw Footpath 6). This continues to raise significant concerns, and there is still no detail in the CTMP as to how users of this right of way will be protected from construction vehicle movements, and the design and setup of this access (e.g. levels of visibility, width, tracking plans, what types of vehicles will route through, for how long, surfacing, etc). It is our view that this access point and the right of way are fundamentally unsuitable for any construction traffic due to safety impacts, and we object to the discharge of condition on that basis.

It would be beneficial if any future CTMP updates were undertaken in red font or similar so that the changes from previous versions are clear.

Signed
Matthew Armstrong

17 April 2023