

Consultation response on behalf of
MR & MRS HANKS, GREEN LANE, LETCHWORTH

In respect of
**Former Norton School Playing Field, Croft Lane,
LETCHWORTH**

Technical Note

July 2021



Document Management

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1 Introduction

Background

- 1.1 Further to the recent planning committee at which this application was deferred, with members requesting additional detail on highways matters, Vincent Gorbing, the scheme architects, have submitted documentation setting out the process that has been followed in terms of site access option analysis.
- 1.2 Four documents have been issued, a covering email, a plan illustrating access options that were considered, a briefing note describing those options and a second briefing note setting out how Vincent Gorbing consider that the proposals comply with highways guidance, specifically LTP4.
- 1.3 Transport Planning associates has been commissioned to assess the new documentation and to provide a review. This review sets out responses to the submitted documents, with specific focus on the drawing and two briefing reports.

Executive summary

- 1.4 The additional details submitted do nothing to overcome the highway safety issues raised by local residents previously and shared by Committee Members at the previous planning committee.
- 1.5 The information submitted is misleading and highlights a low quality of analysis. Key matters have been ignored and the reasoning for choosing one option rather than another is fundamentally flawed.
- 1.6 There are factual errors, especially in the 'LTP4 compliance' document which suggest that the scheme provides something which it clearly does not and then goes on to rely upon that to justify the scheme's compliance with LTP4.
- 1.7 The additional information provides no answer as to why Hertfordshire County Council have failed to object to proposals which are clearly contrary to their own safety guidance. This is a matter that has repeatedly been queried and Committee Members have now also asked for it to be answered, however HCC as highway authority have still failed to provide any answer.

2 Access options Briefing Note

- 2.1 Paragraph 2 sets out that it was agreed with HCC highways that the proposals should “*focus on meeting LTP4 objectives, through securing wider connectivity via sustainable travel options*”. The proposals however fundamentally fail to achieve this as they rely upon access to the nearest primary school being via a sub-standard road with no pedestrian footways. This is further reinforced in setting out that the requirements include a 1.8m footway (ideally on both sides of the road) – clearly something that the development fails to achieve.
- 2.2 Paragraph 3 also refers to a ‘requirement’ for a 3m shared cycle / pedestrian route however no such facility is required by HCC policy. Clearly HCC do not consider that such a facility is necessary for this scale of development, given that they have recently responded to the current planning application for 128 houses at the site known as LG3 and have raised no objection to the proposals (app reference 21/00504 – Land east of Talbot Way, Kristiansand Way and Flint Road). That proposal does not include any shared cycle / pedestrian route. Pedestrian access is provided by footways alongside the access road and the public footpath to the north of the site (where cycling is prohibited).

Cashio Lane access options

- 2.3 Analysis of the Cashio Lane options confirms that the access is 8.4m in width, enough for a 5.5m road and 2m footway with just under 1m to spare and plenty of scope to widen Cashio Lane and maintain footway provision (all outside of the conservation area). These options have however been dismissed on the basis that, supposedly, a 3m shared pedestrian and cycle access is required. As explained above, that is not a requirement for this scale of development. The analysis of access via Cashio Lane is therefore fundamentally flawed.

Croft Lane access options

- 2.4 The option of constructing a footway along the section of Croft Lane which does not currently have a footway is discussed and is shown on the submitted plan, annotated as “Option 5”. This option is dismissed as not being acceptable due to “*unacceptable harm to the conservation area*”. That conclusion is however an odd one as much of Croft Lane already has footways and some sections have a footway on one side with no adjacent grass verge, plus the proposals as they stand include footway widening along parts of Croft Lane, therefore clearly additional hard surfacing has been considered acceptable within the Conservation Area.
- 2.5 This option would therefore appear to be in keeping with the nature of Croft Lane within the conservation area. The conclusion set out by Vincent Goring is not supported in writing by the NHDC conservation officer, as no written comments have been provided by that officer at any time during this application.

- 2.6 Analysis of this option therefore appears to have been flawed, incomplete and the conclusions are neither consistent with conclusions made elsewhere with regard to the development proposals, nor are they supported in writing by the NHDC conservation officer, written advice / opinion from whom appears conspicuously absent throughout this application.
- 2.7 Paragraph 22 of the Briefing Note, supporting Option 7b which is the option that the proposed development is intended to follow, suggests that footways are provided leading east and west from the access on Croft Lane enhancing *“sustainable transport provision in line with LTP4”*. This is however misleading and incorrect as there is only a short ‘stub’ of footway proposed to the east of the access on Croft Lane, then no footway at all for 220m – failing to meet the objectives of LTP4.

Briefing Note conclusion

- 2.8 The conclusion of the Briefing Note suggests that the proposals are based upon an access option that is the *“least harmful in terms of impact on the Conservation Area, having considered all possible access options, which is acceptable in planning policy and technical highways terms. There are other options that deliver the public benefits, but these all result in greater harm to the Conservation Area, and do not deliver on the sustainable transport benefits required by LTP4.”* This statement is grossly inaccurate as the access options have not been analysed correctly and options that are less detrimental to the Conservation Area have been dismissed based upon incorrect assumptions as to what is *“necessary”* for a development of this scale, in Hertfordshire.
- 2.9 The lack of any reference to highway safety is also notable, as the proposals clearly fail to meet HCC highways standards with respect to pedestrian safety and the safety of vulnerable road users, including children, the elderly and disabled persons.

3 LTP4 Provisions Briefing Note

- 3.1 This Briefing Note begins by setting out the key objectives of LTP4, which are stated as including *“securing sustainable development”* and *“providing safe and efficient travel”*. The proposals fail on both fronts, providing sub-standard access arrangements / links to key local amenities, to the detriment of highway safety and which will encourage future residents to drive rather than walk or cycle to / from the site.
- 3.2 Paragraph 3 sets out Policy 1 of LTP4 and references that the policy requires *“built environments that encourage greater and safer use of sustainable transport modes, with priority given to walking & cycling”*. As stated above, the proposals do not comply with Policy 1 of LTP4 as they fail to secure a built environment that provides safe access to the nearest primary school via foot or cycle.
- 3.3 Policy 5 of LTP4 is discussed at paragraph 5 and part b of that policy sets the objective to *“Ensure access arrangements are safe, suitable for all, built to an adequate standard and adhere to Design Standards”*. Once again, the proposals clearly fail to comply with Policy 5 of LTP4 by not providing safe access arrangements and not adhering to the relevant Design Standards, with particular respect to the lack of any footway on Croft Lane east of the site.
- 3.4 Paragraph 7 deals with Policy 7 of LTP4, which has a focus on Walking. The policy text states that development should *“encourage walking by implementing measures to increase priority for pedestrians relative to motor vehicles, delivering infrastructure to provide safer access to key services”*. Once again, for the reasons already highlighted, the development proposals fail to adhere to this policy.
- 3.5 The Briefing Note goes on to provide a table titled *“Sustainable Transport Attributes of the Scheme”*. The second box of the table states *“Footpath to the east and west of the proposed access onto Croft Lane”*. This is misleading and rather than being a point of compliance, this is actually the key matter of non-compliance with LTP4, as there will be no footway to the east of the Croft Lane access, bar a short ‘stub’.
- 3.6 Various references are made within the table to a Road Safety Audit (RSA) which, it is suggested, *“confirms the proposals are safe”*. This is again misleading and inaccurate – an RSA confirms that proposed highway works are safe, or recommends changes to them if they are not however an RSA does not take into consideration the safety of pedestrians using a section of an existing road that has no footway as this is not an area of proposed highway works.
- 3.7 The correct Audit to consider that matter is a PERS (Pedestrian Environment Review System) Audit or a Safer Routes to School Audit and neither has been undertaken, despite the proposals relying upon primary school access being via Croft Lane, for at least the majority of residents and it being an existing school access route, where the development will increase peak traffic three fold.

- 3.8 Notably, the proposals include a new traffic signal controlled pedestrian crossing across Norton Road on the desire line to the nearest Primary School, which will increase the likely demand for parents / children using Croft Lane as a route for walking to the school, further compounding the issue with the lack of footway on Croft Lane.

4 Summary & Conclusion

Summary

- 4.1 The additional details submitted do nothing to overcome the highway safety issues raised previously and shared by Committee Members at the previous planning committee.
- 4.2 The information submitted is misleading and highlights a low quality of analysis. Key matters have been ignored and the reasoning for choosing one option rather than another is fundamentally flawed.
- 4.3 There are factual errors, especially in the 'LTP4 compliance' document which suggest that the scheme provides something which it clearly does not and then goes on to rely upon that to justify the scheme's compliance with LTP4.
- 4.4 The additional information provides no answer as to why Hertfordshire County Council have failed to object to proposals which are clearly contrary to their own safety guidance. This is a matter that Committee Members have now asked to be answered, however HCC as highway authority have still failed to provide any answer.

Conclusion

- 4.5 The application proposals remain flawed and fail to comply with relevant safety related highways guidance and sustainable travel guidance in LTP4 and should therefore be refused on highway safety grounds, being contrary to policies T1, SP6 and SP7 of the emerging Local Plan, to the National Planning Policy Framework, paragraph 109, as they will result in an unacceptable impact upon highway safety.
- 4.6 The proposals are also contrary to Policy 57 of the 'District Local Plan No.2 with Alterations – Saved Policies under Planning & Compulsory Purchase Act 2004' (dated September 2007), as they do not provide safe pedestrian access to local community facilities.

Figures

APPENDIX A