

FAO: Nikki Ffrench
Hertfordshire County Council
By email only

Our Ref: IF/LCWIP2022
Your Ref: LCWIP/NHDC
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6 December 2022

Dear Nikki,

Re: North Herts Local Cycling and Walking Infrastructure Plan (LCWIP)

North Herts Council (NHDC) is strongly supportive of the creation of a Local Cycling and Walking Infrastructure Plan (LCWIP) for North Herts, and is keen to continue working closely with Hertfordshire County Council to refine and deliver interventions set out the draft LCWIP.

Section/paragraph references are to the June 2022 draft of the LCWIP main document.

Summary of general observations from engagement events

Maintenance: Many people expressed concern about poor levels of maintenance of roads, footways and cycle tracks. This covers degraded surfaces, tree root damage, vegetation overgrowth, obstacles (such as fallen branches), and obscured signage (notably speed limit signs). This extends to scepticism that the local authorities will manage to maintain new walking and cycling paths, which undermines support and confidence in the LCWIP.

Parking enforcement: Many also expressed frustration at lack of enforcement around obstructive parking, on pavements, and close to junctions and controlled crossings.

Safety: An important point was raised about the prioritisation matrix, that it does not explicitly score safety. Although safety is central to LTN1/20 compliance, there is no specific test of safety for interventions for walking only. Most of the tests are economic. Safety does have an economic dimension too, in that it reduces the direct and indirect (e.g. loss of earnings and bereavement) costs associated with people being killed or injured. Lack of (perceived) safety is also a key impediment to achieving the other tested

objectives (modal shift, access to jobs, etc.) Therefore, there may be a case for (real and perceived) safety being an explicit test for all schemes. This would consider natural surveillance, quality of a neighbourhood and other social factors that determine whether people will use a foot or cycle path.

Traffic speed: Many people expressed concerns about traffic speeds, not only as a hazard when out walking or cycling, but also being able to drive in or out of their own driveway safely. (The latter point may relate to maintenance of verges and hedgerows as much as to traffic speeds.) There seems to be widespread support for reducing speed limits, and some acceptance that this also requires complementary traffic calming measures. Some people expressed relief that road humps are no longer a recommended form of traffic calming.

HGVs: Another consistent concern is the impact of HGVs in town centres and residential areas, and on roads where people do or would like to cycle. HGVs present a significant hazard to people cycling (see below); they generate a relatively high level of air pollution, noise, vibration and damage to roads. There is therefore likely to be strong support for measures to reduce the number of HGVs on certain roads, provided they are displaced to more suitable roads.

Partial implementation: Some people identified examples of where delivery of part of a larger intervention could by itself provide benefit. For instance, a short section or segregated cycle lane between two junctions could facilitate crossing movements. Where this would significantly improve access, the smaller intervention could be identified separately in the LCWIP, and therefore potentially delivered more quickly than the larger intervention, of which it will ultimately form a part.

Terminology: Many people wanted to know what “traffic calming” or “junction improvement” would mean in practice. This is set out in the LCWIP report (§6.2.1), but not somewhere that was readily accessible to people.

Clarifications: Some interventions need a clarificatory description, such as the Stevenage Rd–Whitehill Rd–Oakfield Ave junction in Hitchin.

ETROs: There was a generally positive response to the idea of trialling interventions (i.e. tactical urbanism using Experimental Traffic Regulation Orders). This overcomes local members’ and residents’ legitimate concern that professional transport officers /consultants cannot accurately predict what the consequences of an intervention will be.

Summary of locally specific observations

Hitchin

There is an engaged community that seems to be generally supportive of the LCWIP interventions proposed for Hitchin. There are specific concerns that have been fed back through the consultation, which we should examine and respond to.

Letchworth

The level of engagement in Letchworth was surprisingly low, with the lowest turnout of any drop-in event. Nevertheless, there are some very engaged individuals with detailed

local knowledge. We have an opportunity through the Sustainable Travel Towns programme to broaden our contact with local residents and businesses.

Some people queried why the Letchworth Greenway is mostly omitted from the LCWIP maps. This needs to be explained in the LCWIP in more detail than in §3.5.2.

Baldock

There is particular concern about the number of HGVs that pass through Baldock town centre. A review of HGV routing is needed. There is a question about whether the interventions proposed for Baldock would achieve the high modal shift to active travel required to mitigate the impact of planned development to the north and east. This will be picked up in the masterplanning of those developments, and we should be prepared to update the LCWIP with any new interventions that emerge from that.

Royston

The principal concerns with the LCWIP are around the impacts of creating a one-way system through Kneesworth Street. Here in particular we will need to link interventions together into a coherent package. There is also a need to provide safe cycling routes into and through the industrial estate in the north-west of the town, as these roads are heavily used by HGVs. The Sustainable Travel Town programme should provide a good opportunity to engage in an imaginative exercise with the community to develop such a package. The proposed A507 weight limit through Cottered should be a prompt to review HGV routing through Royston.

Knebworth

There is strong and well organised opposition by some of the residents and local businesses to most of the interventions proposed in Knebworth. There are also widely differing views on the individual interventions. There is more consensus around making improvements for walking than for cycling. In order to gain a balanced view of the wishes and concerns of the community, we will need to engage proactively with, in particular, younger residents.

Perhaps the most needed intervention is a widening of the footways under the railway on Station Road and Gun Lane. The strong preference would be to create a new route under the railway for people walking and cycling. All options for this should be explored, including with Network Rail, perhaps as part of a feasibility study into providing level access to the platforms at Knebworth station.

It was unfortunate that the LCWIP map incorrectly showed two modal filters on Gun Lane (this was shown correctly on the consultation map). Because of this, it may be difficult to determine if there is support for a single modal filter to prevent rat-running.

It may be desirable to explore alternative north-south routes that avoid the most conflicted parts of the B197 (Stevenage Rd–London Rd), perhaps using Kerr Close and Pondcroft Road.

Access issues in Knebworth will be explored as part of the masterplanning process for the Local Plan allocation sites in Knebworth, and we should be prepared to update the LCWIP with any new and changed interventions that emerge from that.

Modifications to the LCWIP

Presentation

Each appendix should have a cover page that clearly shows the appendix letter, title and a short description of the content. Appendix K is currently mislabelled as *Appendix J*.

If the appendices are to be provided as a single file, pages need to be numbered and page references included in the table of contents. The scheme maps (Appendix G) and an Excel spreadsheet of prioritised interventions – urban and rural – (Appendix J) should also be available to download separately.

The annotated maps are the most accessible form of presenting the LCWIP schemes (provided they are printed large enough or can be examined interactively on-screen). These therefore should be comprehensive (see below regarding missing schemes), accurate (see below for examples of corrections and clarifications), and easy to interpret (the icon designs could be more distinct). They should also be accompanied by a summarised version of §6.2, describing what the proposed interventions mean.

General approach to delivery

NHDC would like to propose adding clear commitments on how the LCWIP will be delivered:

1. Include in the consultation report a table listing all suggestions received, and what we have done with them (broadly: made a specified change to the Plan; rejected the suggestion because of specified conflicts or non-compliance; referred the suggestion to the appropriate department; noted the suggestion for picking up in a future update to the Plan).
2. Undertake to engage proactively with communities, including making leaflet drops and holding workshops, to explore how best to design and implement schemes that will have a significant impact (or where local people believe they will).
3. Take a phased or incremental approach to major interventions where possible, to demonstrate and monitor the impacts, with threshold tests before progressing to the next iteration.
4. Use Experimental Traffic Regulation Orders where possible to allow flexibility in scheme design and reassure residents that the scheme will not remain in place if the negative impacts are significantly worse than expected (e.g. based on prior modelling).

Other schemes

Having a single comprehensive map of all active travel schemes in North Herts will make it easier for planners and developers to see and understand how we are aiming to build a coherent active travel network. So, for completeness, the LCWIP intervention maps should show all planned and in-progress interventions, including:

- All active travel schemes featured in the Growth & Transport Plan.
- Hitchin - Westmill area to the station (§4.6.3)
- NCN route 12 Stevenage – Letchworth (§4.6.3)
- Improvements in Pirton (§6.4.18 and §6.4.19)
- Improvements in Great Ashby (§6.4.20)

The spreadsheet containing the Pirton and Great Ashby schemes needs to be included in the LCWIP.

Equestrians

The LCWIP should include an explicit policy on providing for equestrians. Where an intervention for cycling could also benefit equestrians, e.g. by enhancing or connecting up existing bridleways, consideration should be given to including that as an objective. Examples include specifying Pegasus rather than Toucan crossings; including a grass verge alongside a cycle track; or increasing the height of bridge parapets.

Complementary measures

It would be worth spelling out (in more detail) what measures we consider would complement the LCWIP interventions, and what their status is in local policy and plans. We know that infrastructure alone will not lead to a largescale modal shift to active travel (Stevenage being a paradigmatic example of this), so we should make clear that the local authorities are developing a holistic plan, of which the LCWIP is only a part.

1. **Allocate more resource to maintaining active travel infrastructure:** degraded and uneven surfaces are difficult to cycle on; seriously degraded surfaces are dangerous to walk or cycle on; overgrowth of vegetation significantly reduces the effective width of a path, and hence the capacity for people to pass safely.
2. **Audit and, where necessary, upgrade lighting:** Poor lighting affects how safe people feel: how well they can see other people and judge if anyone might pose a threat; how visible they are to other people who could come to their assistance if needed (natural surveillance); and how well able they are to see and avoid trip-hazards and other obstacles. Consistent lighting along routes, especially at junctions, crossings, passageways, underpasses and steps is critical to making people safe and *feel safe* when walking or cycling in the dark. It is notable that LED street lamps have a narrower beam than older street lamps, and can leave large areas of footways poorly illuminated. As schemes are progressed, it will be necessary to conduct route audits after dark to gain an accurate appreciation of what lighting upgrades may be required.
3. **Install more cycle parking:** Access to secure cycle parking in convenient locations, monitored by CCTV if necessary, is critical to attracting more people to cycle. Having a bike stolen can halt someone's efforts to take up cycling. Fly-parking of cycles, where they may obstruct footways, can cause irritation and distress to people walking, especially those with impaired vision.

4. **Reduce vehicle speeds where segregation is not possible:** There seems to be widespread support for reducing speed limits in urban areas. This is partially covered by “traffic calming” in the LCWIP. However, the HCC *Speed Management Strategy* still sets mainly technical conditions on reducing speed limits. NHDC would like to see a more ambitious application of the guidance on p.65 of that strategy: *“In line with LTP4 principles we will support 20mph areas where there is potential for active travel. Evidence has shown that persons are more likely to consider active travel with speed limits are low and as such Hertfordshire County Council will consider funding areas where there are greater chances of active travel.”*
5. **Enforce speed limits:** Although it is important to design roads to induce people to drive at a safe speed, it can require costly interventions to achieve a small reduction in average or, more importantly, maximum and upper (e.g. 85th percentile) speeds. Funding should be prioritised where it will make the greatest positive difference, but that should not mean residents have to wait potentially decades before we intervene to create safe conditions for walking and cycling across the whole district. NHDC would like to pursue with HCC and Hertfordshire Constabulary a more a realistic policy on traffic cameras and enforcement to support an ambitious update to the HCC Active Travel Strategy.
6. **Enforce weight limits:** HGVs pose an especially serious hazard to people cycling because of the vehicle’s tracking envelope and driver’s restricted vision when cornering. There is an extensive 5 tonne weight restriction in Hitchin, which is poorly signed and seemingly unenforced. HCC will soon acquire powers to enforce weight limits. Reducing potential conflicts between HGVs and cycles should be a high priority in the revised Active Travel Strategy, using weight limits and enforcement as tools where physical segregation is not possible and practicable.
7. **Introduce cycle hire schemes:** Improving infrastructure does not help someone who doesn’t have access to a bike. Cycle (and potentially e-scooter) hire is one way that people can test out cycling without investing in a bike and finding somewhere to store it.

Updates to the LCWIP

There are some identified interventions that do not feature in the draft LCWIP. These mainly relate to planned or potential new development sites, where Section 106, other funding or contributions of land could become available. From a planning perspective, it is important that there exists adopted policy underpinning any requests from developers.

If time and resources permit, NHDC would like these to be audited and included in this first iteration of the Plan. However, NHDC does not want to delay adoption of the LCWIP, and therefore seeks HCC’s agreement to put in place a process for making minor updates and insertions to the LCWIP in the interim before we embark on a wholesale review and update to produce a second iteration.

It should be stressed that the inclusion of the suggested interventions in the list below is not an indication that NHDC has formed a predetermined view on any extant or future planning application. The intention here is only to fulfil the duty shared by the planning and transport/highway authorities to be fully *prepared* with plans that incorporate appropriate supporting infrastructure and mitigations for any development that does in fact proceed.

Proposed additions to the LCWIP

1. The intervention along the A10 southwards in Royston should be extended to Shrubbery Grove. This would of course serve existing residents of that neighbourhood. But there is also a live planning application for development west of Barkway Rd. For some new residents, a convenient walking route to the town centre would be via Shrubbery Grove. There is also a possibility that it may form part of a new cycling route.
2. The intervention along Old North Road (B1198) north out of Royston requires a safe crossing of the A505, ideally grade-separated. This would mainly serve South Cambridgeshire residents in Kneesworth, Bassingbourn, Bassingbourn Barracks and Whaddon. As this will be an expensive piece of infrastructure, the cost of which will need to be shared with Cambridgeshire authorities, it is important that the need for it is identified in this plan, along with an approximate cost.
3. Detail is needed on the potential route to link Ashwell with Ashwell & Morden railway station. This has long been identified as a need, and therefore a plan is urgently needed (as recommended in §6.5.2).
4. A safe cycling route from Little Wymondley into Stevenage will be of critical importance for the site allocation in the village (WY1) to meet sustainable travel objectives. The route through the A1 interchange will be unattractive even if each crossing is signal-controlled, as suggested in the North Herts LCWIP. Furthermore, the Stevenage LCWIP (which is the one that applies here) proposes no improvements to the A1 interchange. Therefore, it is important that we audit alternative routes via Blakemore End Road or Chantry Lane, and thence via Stevenage Road (the one south of the A602), Fishers Green Road and Julians Road; or, to reach the Lister Hospital more directly, via the Sheringham Avenue and the footbridge over the railway to Herne Road. The Stevenage LCWIP will need to be updated with detail on the Stevenage elements of whichever routes are included in the North Herts LCWIP.
5. NCN12 is potentially an important route between Stevenage and Letchworth/Baldock, as it runs close to new developments to the north of Stevenage and the Lister hospital, the largest employer in Stevenage. This should be audited with Sustrans as soon as possible, with a view to incorporating it into an interim update to the North Herts and Stevenage LCWIPs (as recommended in §6.5.2).

Second iteration of the LCWIP

NHDC and HCC have agreed to work together on finding further resources to produce a second iteration of the North Herts LCWIP within two years of adopting this iteration (i.e. by mid 2025). NHDC would like to meet and agree with HCC a process for scoping a second iteration of the LCWIP, starting with the locations listed in §7.10.2, so that we can quantify the necessary resources, and ensure that this is adequately budgeted for by both authorities. We will need to start that work by the middle of 2023 so that we can feed into the budget setting process for 2024/25.

Yours sincerely,



Ian Fullstone
Service Director, Regulatory