

Planning application: 24/00756/FP  
**Hertfordshire Highways Comments**

**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:

The proposed access arrangement as shown in the proposed plan (Ref- PL200 Rev-C) will not be acceptable.

- The access arrangement as shown the drawing (Ref- PL200 Rev-C) is substandard in terms of its width to accommodate emergency vehicles.
- The application has failed to demonstrate how the emergency vehicles (such as ambulances, delivery vans, fire service vehicles) will enter and exit the site in forward gears.
- The application has failed to provide overhead clearance (height of the gate) to accommodate emergency vehicles.
- The application has failed to provide sufficient turning area for emergency vehicles within the site.
- No information is provided for the service road which is appeared substandard in terms of its width to pass vehicles each other.

**Comments:**

This is a full planning application for erection of five 2-bed dwellings, retention of office use class to main front building, provision of 9 parking spaces and bin storage. It also include the removal of existing archway gates and installation of new sliding gates.

Key policy documents used to assess the application are.

- National Planning Policy Framework (Dec 2023).
- Hertfordshire County Council's (HCC) Local Transport Plan-4 [2018-2031, May2018]
- HCC's Place & Movement Planning Design Guidance adopted in March 2024
- North Herts Local Planning policy [2011-2031]

**1. Highway Impacts**

**1.1. Access:**

The application site can be accessed via an undercroft exiting access off Hitchin Street. Hitchin Street is a numbered classified road (B-656) and provides secondary distributor functions to the road hierarchy. The speed limit is 30mph along this section of Hitchin Street. The submitted drawing (Ref-PI200 Rev-C) shows the access width about 2.5m wide which is substandard to accommodate emergency vehicles such as fire engines, ambulances, and deliverer vans. A minimum width of 3.7m should be provided to allow emergency vehicles (fire and ambulance) and delivery vans to serve the development.

**1.2. Deliver and Service Plan**

The applicant has failed to demonstrate how the new development will be served by the service and delivery vehicles (e.g., supermarket delivery vans at circa 6.5 meters width, larger white goods delivery vehicles etc.). The application does not consider how these vehicles will safely and conveniently access the site. Overall, the applicant should provide a Delivery & Servicing Plan, which audits the private road approaches (widths, overhead) and proposes any improvements necessary.

This would also need to include tracking diagrams of service vehicles into and out of the private road network, and any turning that they need to undertake within this network.

In the absence of delivery & service plan, the Highway Authority has concern that parking up outside the site on this stretch of highway or reversing out of such delivery vehicles onto a busy road will adversely affect the free and safe flow of public highway users.

**2. Headroom:**

The application has failed to provide the headroom for the existing access which raise significant concerns to the Highway Authority. The current guidelines and policy recommend that to accommodate mid-sized service vehicles such as supermarket delivery vans and ambulance service vehicles, which should be as high as 3.7 meters to accommodate emergency vehicles. The Highway Authority has considered that such service vehicles are highly likely to visit the site on a reasonably regular basis and will be unable to enter the side and will have to stop outside onto Hitchin Street which affect the free and safe flow of public highway users. Also, if service

and emergency vehicles do stop onto the public footway, pedestrians will be forced to stop or walk onto main carriageway which is not acceptable.

**3. Turning Area:**

The proposed plan (Ref- PI200, Rev-C) shows vehicle tracking for only cars and failed to provide such for emergency vehicles. The applicant needs to provide sufficient turning area/ circle for emergency vehicles (Fire engine, Ambulance and Vans) in accordance with the current policy and guidance such Manual for Street (MFS) and Town and Country Planning Act Response Guide for Fire safety.

**4. Conclusion:**

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 highway safety, sustainability, and convenience.

Having said that, the Highway Authority has no real issue with the broad principle of this development in the context of sustainability. The highway is concerned with the Emergency Access and Service & Deliver Plan. If the applicant can resolve the access issues for emergency vehicles which would not affect the free flow of traffics onto this segment of Hitchin Street, I am more than happy to reconsider the proposal. To conclude, refusal is recommended at this stage for the reasons given at the start of this report.

**Signed**

Shamsul Huda

3 May 2024

## Applicant responses:

### Comments:

This development is for the conversion to 5 no. 2 bedroom units – not the erection of 5no. 2 bedroom dwellings as stated in the initial sentence of the comment. If the site were not part of a Listed building or within a conservation area, then permitted development rights would apply and planning permission would not be required for this conversion development.

### Highways impacts:

In general, Highways impact points 1-4 are based on the same apparent issue – that of Access/egress for emergency and delivery vehicles. While these points would be of concern to a new development, or to a site of higher occupancy, highways have not taken the following into account when assessing the application:

**1. Listed Buildings and Conservation area:**

It would seem that highways have not considered the listed nature of the historic frontage, and its inherent restrictions of height and width. Furthermore they seem to think that the access is a “service road”, rather than a private driveway proposed for residents and office users.

As existing, this private entrance serviced approx. 16 office units, and did not need to be constructed of 2 lanes as they now seem to require.

NPPF-2023 para 116 (d) is referring to development sites (can this site be classified thus, or would we be deemed conversion?), but Highways have not read this in conjunction with para’s of **Considering potential impacts**, especially 214. *Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.*

**2. Emergency Vehicles:**

A fire tender would also NOT be required to enter site, we have accounted for sprinklers to

the final block (4 & 5), this being the only part of the development that would fall outside the 45m max distance required for Fire brigade hose distance from tender to the further part of the conversion.

Standard practice from the Fire Brigade is to stop at the roadside rather than entering private driveways/sites, hence the 45m max hose distance and sprinkler system implementation to meet current building regulations.

Fire Brigade access/approval would usually be dealt with through the Building Control process.

3. *Previous and recent applications:*

*Several conversion applications have been approved within the local vicinity, that are similar in either occupancy, off-street layout or associated with Listed buildings (all are within the Conservation area).*

**File Ref: 18/00524/FP**

Date: 22/02/2018

Address: 8 Whitehorse Street, Baldock, Hertfordshire, SG7 6QN

Subject: Alterations and Conversion of Grade II listed Hotel and Public House to form 5 residential units, resizing of existing commercial space and construction of associated cycle and refuse storage within car park. Demolition of existing steel stair/gantry and single storey side extension. (Amended plans received 30/04/18, 30/05/18 and 10/09/18).

**File Ref: 18/00525/LBC**

Date: 22/02/2018

Address: 8 Whitehorse Street, Baldock, Hertfordshire, SG7 6QN,

Subject: Internal and external alterations including the demolition of existing steel stair/gantry and single storey side extension, to facilitate resizing of existing commercial space and part conversion of Hotel/Public House to 5no. residential units. (Amended plans received 30/05/18 and 10/09/18).

**File Ref: 22/02180/FP**

Date: 24/08/2022

Address: 9 - 15 Hitchin Street, Baldock, Hertfordshire, SG7 6AL,

Subject: Change of use of existing office building into seven 1-bed and one 2-bed flats comprising a first floor rear extension, insertion of rooflights to existing front and dormer to existing rear roof slopes to facilitate conversion of loftspace into habitable accommodation, insertion of a rear external staircase and amendments to existing doors and windows.

**File Ref: 23/00389/FP & 23/00461/LBC**

Date: 18/05/2023

Address: Monitor House, 6A Hitchin Street, Baldock, Hertfordshire SG7 6AE

Subject: Conversion of existing gallery into two 2 bed dwellings together with external alterations (FP) External and internal alterations to facilitate conversion into two 2 bed dwellings (LBC)

Please note that application **24/00537/FP** has also now been approved (highways consultation made at the same time), with no adverse comments from highways – and no mention of ambulance, delivery and refuse vehicle issues, even through there is rearward vehicle parking via a historic archway!!

These applications have been approved with little to no comment from Hertfordshire Highways, even though all applications are off-street and share similar vehicular access restrictions. For some reason we do seem to be receiving differential treatment from the other developments along Hitchin Street.

**4. Existing Conditions:**

Due to the nature of the historic street and restricted access to the rear of the residential units, it is not possible for off-street deliveries to Hitchin street. Imposing a policy as outlined by Hertfordshire Highways in this location, for all Emergency vehicles and deliveries to be made off-street would be impossible.

None of the existing access points, or those to the latest applications are suitable for deliveries or emergency vehicles.

All of the buildings to the Northern side of Hitchin street, from The Gardens to Church Street are Listed buildings, all but 3 on the Southern side (please see map below).

With the above comments in mind regarding access to off-street locations, it is apparent that roadside deliveries are already used (please see photos below), if Highways were to insist on off-street deliveries and emergency access only, how would any regulation be enforced?

**Conclusion:**

Given the existing street conditions, historic architectural constraints and recent similar approvals, we would hope that the Planning Committee would look past the Highways comments, and look more to:

*NPPF-2023 para 214 **Considering potential impacts**, Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.*

*As mentioned in previous communications, we have tried to retain a sufficient volume of office space to the main frontage, however the rear units are no longer sustainable for this use class and location. As a result it would seem most appropriate for a residential use to be employed to the remaining areas of the application site, to complement the residential dwellings, flats and garden spaces that bound on all sides.*



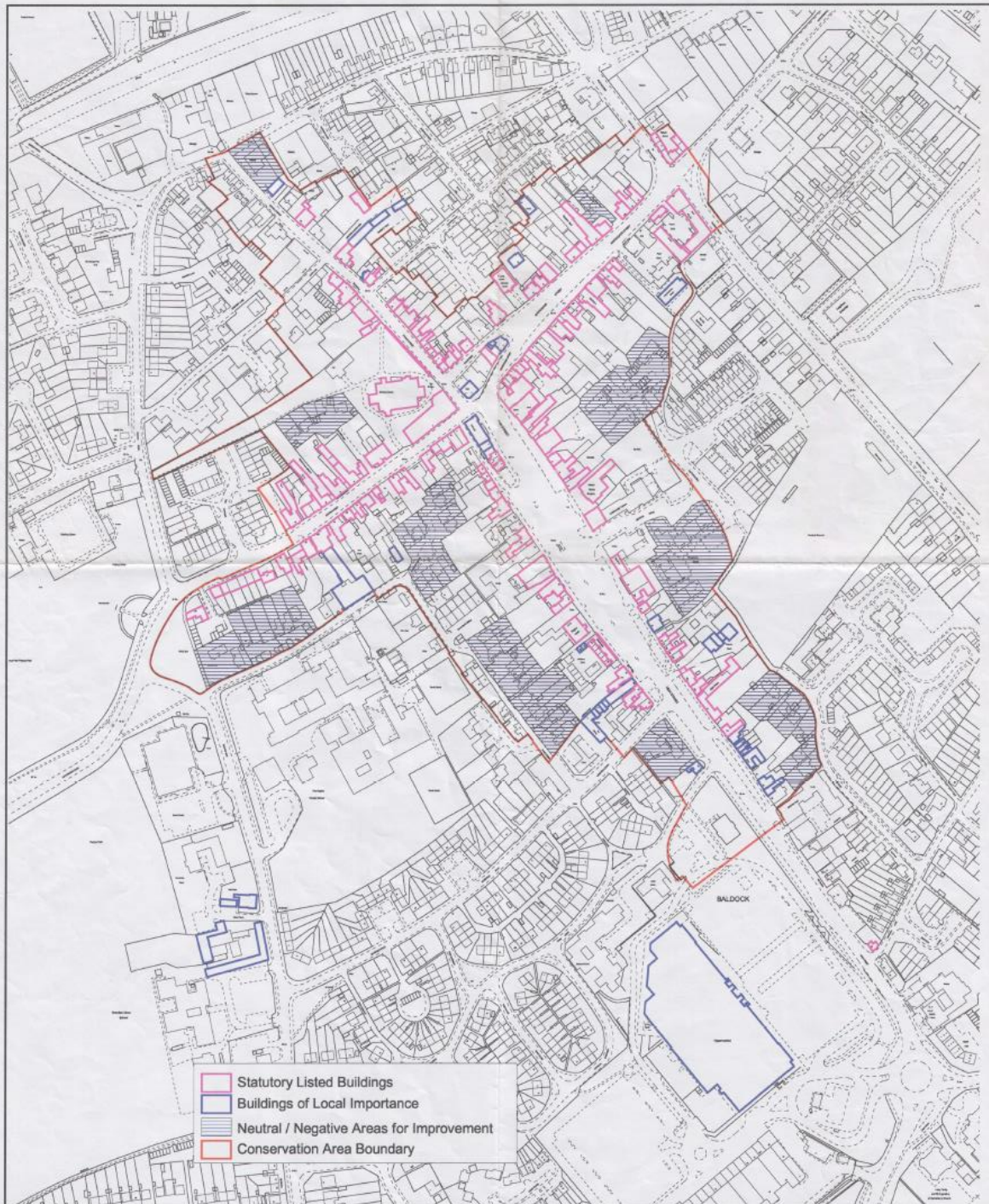




NORTH HERTFORDSHIRE DISTRICT COUNCIL

**Baldock Conservation Area  
Designation Amendments**

17th June 2003



Scale 1 : 2000  
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To be used to view the amended Baldock Conservation Area  
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