Royal HaskoningDHV
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Note / Memo

HaskoningDHV UK Ltd.
Transport & Planning

To:	North Hertfordshire District Council
From:	Phil Marshall
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Our reference:	PC1534-RHD-NT-0001-NT-0001
Classification:	Project related
Checked by	Phil Marshall

Subject: **Planning Application Ref: 20/00744/OP - Review of Transport Assessment**

Introduction

Royal HaskoningDHV (RHDHV) has been appointed to provide transport and highways advice to Royston Says No To Gladman. This note has been produced following a review of a recent outline planning application for proposed residential development of up to 99 dwellings on land off Echo Hill, Royston (the site). The planning application submitted to North Hertfordshire District Council (Ref: 20/00744/OP) is supported by way of a Transport Assessment (TA), produced by Ashley Helme Associates. The following sections of this memo provide commentary on the technical weaknesses within the TA.

Site Sustainability

Fundamentally, the site is very poorly located in relation to access to services, the TA aims to disguise this issue at 5.1.4.3 by referencing CIHT guidance, however omits most of the salient information. Whilst 2,000m is the maximum commuting walk distance, the column "Elsewhere" is most relevant for shopping and leisure trips. By the "Elsewhere" measure, the maximum walking distance should be 1,200m, with an acceptable distance classed as 800m. It is notable that these distances do not account for gradient, which would reduce the acceptable walk distances.

By the applicant's own omission at Table 5.1, the nearest facility site is a public house at 955m, with all other facilities 1,020m or more away. Furthermore the closest primary school is at least 1,270m away.

It is notable that these measurements appear to be from near the site access (i.e. the closest part of the site). Given the site is c. 300m in length, it is apparent that many residents would be considerably further from services than suggested in Table 5.1 of the TA. Thus many of the facilities listed would be outside the maximum walking distance of site residents, especially given the gradient of the walk back to the site.

Given the distances and gradients involved, it is unlikely new residents would walk to access local facilities, and would thus be car dependent, contrary to planning policy.

The TA states that some sections of the existing Sun Hill footways would be widened as part of the proposed mitigation for the scheme, as set out in Drawing No 1517/23. Whilst any measures to improve pedestrian routes must be applauded, it is apparent that the route would remain significantly below standards, and again the standards have been incorrectly presented.

Paragraph 6.3.22 of Manual for Streets (MfS) is clear that footways should have a minimum unobstructed width of 2m. Whilst it is acknowledged that Figure 6.8 of MfS shows widths of different street users, this

does not take account of any space between users passing each other. Notably, Drawing 001220-JPL-ZZ-XX-DR-D-2001 in the TA, shows the site access including the standard 2.0m wide footways typically expected.

Drawing No 1517/23 in the TA quantifies the proportions of the Sun Hill footway that meets various width criteria, before and after the proposed works. From the information, it is unclear whether any of the improved footway meets or exceeds 2m width. It is however clear that less than half (46.9%) of the route would be 1.8m wide after it has been "improved". Even these figures must be taken with a degree of sceptism given the consultants have included sections of footway not on residents natural walking route, and have not accounted for any impacts of narrowings required to retain existing street trees.

It is noted that the Sun Hill route provides the most direct route to the town centre from the site, however Briary Lane provides the most direct route to the nearest primary school, Tannery Drift First School. Whilst Drawing 1517/14 suggests dropped kerbs and tactile paving at the Briary Lane / Sun Hill / Stake Piece Road junction, that is the only improvement of the route proposed. 5.1.8.3 of the TA states *"This represents a good walking route for school children."*

No reference is made to the narrow footways along Briary Lane. Insert 1 shows a typical section of the footway, which is charitably 1m wide. Thus any parents walking to school would not be able to walk alongside their children, and were they to meet someone walking the other way, one party would have to step into the carriageway. It is not credible to state that Briary Lane is a good walking route for school children.

Insert 1 – Briary Lane

It is also noted that the applicant intends to use Bridleway BW R013 as a secondary access point, to be restricted to walking, cycling and emergency access. At present the Bridleway is poorly surfaced, unlit and would not meet current design standards, especially in terms of permissible gradients for access by the mobility impaired. Pedestrians would also be expected to share the bridleway with vehicles. Insert 2 shows the northern end of the bridleway, looking south from Briary Lane. No drawings have been provided to demonstrate that the applicant could suitably improve the Bridleway, furthermore it is unclear whether the applicant has the right to make any improvements.

Insert 2 – Bridleway 13

Cycling

There is a general lack of consideration for the potential for cycling trips to/from the development. The TA states at 5.2.2.2 *"It is considered that both the Briary Lane and Sun Hill routes are environments conducive to cycling."*
Considering the narrow nature of Briary Lane and Sun Hill, this is not a suitable environment for all cyclists. Both routes are effectively one lane wide for long stretches due to parked cars. In such situations if cyclists are travelling against traffic, invariably they will have to give way to drivers. Likewise if cyclists have vehicles behind them there are limited opportunities for drivers to pass cyclists safely. There is no mention of dedicated cycle infrastructure through the site. A full review of existing routes surrounding the site would also be expected.

Public Transport

It is noted that section 6.2.1.1 quotes the bus station being 750m away from the site, contradicting Table 5.1 which states 1,030m. It is expected that the 1,030m distance is more accurate, however this does not

reflect the length of the site. As such the nearest residents of the site would be over a kilometre from a bus stop and the furthest likely to be nearer 1.5km. This is in direct contravention of the expectation that new residents should be within 400m walk of a bus stop, a standard that has been established since the then Department of Environment Circular 82/73 from 1973.

Whilst Table 6.1 provides some information regarding frequency of service, it is careful not to state the number of buses in a typical or peak hour. At 6.2.2.7 the TA states: *"The existing bus services operating in the vicinity of the Site offer a good level of frequency and a range of destinations."*

The statement at 6.2.2.7 is very much contested. Typically a good level of service would be considered to be a bus every 15 minutes, whereby passengers begin not to rely on a timetable. In this instance, the most frequent service is every 45 minutes.

It is understandable that it would not be viable to divert a bus service to the site given the access constraints. However this demonstrates that the site is therefore inherrently unsustainable, with very limited potential for new residents to use public transport.

Overall, it is clear the site is not sustainably located, and this fundamental issue is not resolved by the limited measures proposed.

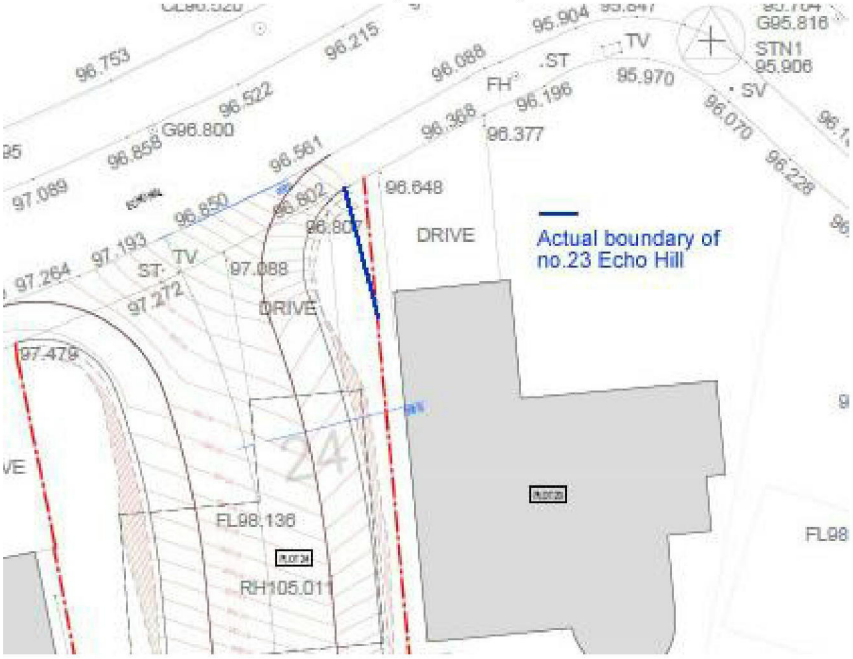
Access Design

It is proposed to achieve a vehicular access to the site by acquiring and demolishing no 24 Echo Hill. Drawing 001220-JPL-ZZ-XX-DR-D-2001 from the TA shows the proposed alignment of the new access road into the site. Review of the drawing reveals a number of concerning issues with design, including:

- Delivery of the access appears to require access to the rear gardens of no.s 23 and 25 Echo Hill in order to install the proposed retaining walls (see section at chainage 35m);
- The red line also includes part of the front garden of no. 23 Echo Hill (see Insert 3);
- The access road would enter the site below grade. No evidence has been provided how the internal roads could meet design standard;
- No details are provided regarding the proposed drainage of the access road. Given the access is lower than the on site drainage features it is expected that the existing highway drains on Echo Hill will be used. It is unknown whether the Echo Hill drains have spare capacity;
- No dimension is shown of the Echo Hill carriageway where it meets the proposed access road;
- No dimension is shown of the distance between the proposed access road and the adjacent junction providing access to no.s 10 to 22 Echo Hill
- The driveways of no.s 23 and 25 are immediately adjacent to the tie in to the proposed junction, reducing visibility;
- No visibility splays are shown on the drawing;
- No line markings are proposed to restrict parking in vicinity of the junction; and
- No swept path analysis has been undertaken to demonstrate the access can accommodate the largest anticipated vehicles.

It is understood that neither no.23 or 25 Echo Hill are owned by the applicant. Neither household has agreed to allow access to their land. In this situation the applicant has no way of delivering the proposed access; the proposals are fundamentally undeliverable.

Insert 3 – Correct Land Ownership Boundary



Note – use of Drawing 001220-JPL-ZZ-XX-DR-D-2001 for clarity only. No liability taken for accuracy of base drawing.

It is noted that no design is provided regarding the proposed emergency vehicular access from Bridleway 13. For clarity, the Bridleway is not part of the public highway network, and the site does not benefit from any existing vehicular access rights from the Bridleway. If this route were to be relied upon as a secondary access, then it would be expected that the applicant could provide adequate information to demonstrate the access could be achieved in a legal and safe manner.

Furthermore, it is understood that four Affinity Water pipes run beneath Bridleway 13. These services would need to be protected and would constrain the potential to alter levels of the Bridleway to achieve reasonable gradients. The ability to install further utilities for the site in Bridleway 13 would also be constrained by the existing services.

Design Standards

The limited plans provided demonstrate that the proposed access arrangements would not comply with the standards required by the Roads in Hertfordshire: Highway Design Guide "the Guide".

Echo Hill currently provides access to 54 dwellings, which equates to a requirement for a Minor Access Road in the context of Table 4.1.1.1 in the Guide. Inclusion of the proposed 99 dwellings would result in Echo Hill serving 153 dwellings, requiring a Major Access Road type.

It is clear that the applicant has not demonstrated the suitability of Echo Hill to become a Major Access Road, because it is not possible. Examples of noncompliance include:

- The 4.8m width of Echo Hill at the proposed site access;
- The junction spacing between the access to no.s 10 to 22 Echo Hill being much less than 33m from the proposed site access;
- The winding, hilly nature of Echo Hill limiting forward visibility; and

- On street parking restricting the effective carriageway width.

Tellingly, no swept path analysis has been undertaken of Echo Hill; any such assessment would demonstrate the number of instances where two vehicles would struggle to pass each other. Likewise no tracking has been undertaken to demonstrate an emergency vehicle could physically enter the site via the Bridleway, irrespective of whether the applicant could legally achieve such an access. Insert 4 shows a large vehicle exiting Echo Hill onto Sun Hill, overrunning the footway; this clearly demonstrates the constrained nature of the road.

Insert 4 – Large vehicle exiting Echo Hill onto Sun Hill

Overall, it is apparent that Echo Hill was not designed to accommodate a substantial increase in the number of houses it currently serves. It is therefore not an appropriate route to serve a new development.

Likewise, Sun Hill and Briary Lane were not designed to current standards, and accommodate considerable stretches of parked vehicles, reducing the carriageway width such that only one vehicle can pass at a time. Increasing the traffic flows using these roads will inevitably increase delays as drivers wait for others to pass. Sight lines at the Sun Hill / Briary Lane junction are very limited at c. 10m from Briary Lane onto Sun Hill. Insert 5 shows Sun Hill on the approach to the the Briary Lane junction, with evidence of kerb overrunning due to constrained carriageway.

Insert 5 – Sun Hill

Based on these observations, it is apparent that neither Sun Hill or Briary Lane are appropriate routes for additional traffic.

Highway Authority

RHDHV note a Hertfordshire County Council consultation response which recommends refusal on various themes, broadly in line with those discussed above.

Conclusion

Based on the information reviewed, the planning application should be refused on highway and transport grounds, namely:

- The fundamentally unsustainable location of the site;
- The constrained access route to the local primary school;
- The undeliverable proposed site access; and
- The constrained nature of the highway network in Echo Hill, Sun Hill and Briary Lane.

Based on these issues, the site must be judged to be contrary to paragraphs 108, 109 and 110 of the National Planning Policy Framework.