REPORT

Review of Planning Application 25/01708/OP

Transport Review

Client:	Royston say no to Gladman
Reference:	PC7908-RHD-XX-ZZ-RP-R-0001
Status:	Final/1
Date:	15 August 2025

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Your reference	Royston
Status:	Final/1
Date:	15 August 2025
Project name:	Royston
Project number:	PC7908
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Date:	15 August 2025
Approved by:	PM
Date:	15 August 2025
Classification:	Project related

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1 Scope of Transport Objection

1.1 Introduction

1.1.1 An outline planning application (the planning application) was submitted to North Hertfordshire Council (Reference: 25/01708/OP) on behalf of Gladman Developments Limited. The proposed development comprises up to 84 dwellings with public open space, landscaping and sustainable drainage system, following demolition of No. 24 Echo Hill to facilitate access to the land opposite Heath Farm, Briary Lane, Royston Hertfordshire. All matters are reserved, save for access.

1.1.2 The planning application was supported by a Transport Assessment (TA) and Travel Plan (TP), prepared by GTA Civil and Transport Consultants. The TA concluded that the proposed development scheme is consistent with relevant transport planning policy guidance and will not give rise to any material transport related impacts, in accordance with the National Planning Policy Framework (NPPF).

1.1.3 This Technical Note (TN) has been prepared by Haskoning following a review of the planning application. Commentary is provided where there are technical weaknesses with the transport submission and where it fails in being policy compliant. Most notably in respect of the potential highway safety issues with the proposed new access arrangement, and the unsustainable nature of the development. These issues were already raised with the two previous outline planning applications for the same site, (ref:18/00747/OP and 20/00744/OP both of which were refused planning permission).

1.1.4 The TN concludes the development proposal would have an unacceptable impact on the local highway network, and therefore North Herts Council are respectfully requested to raise an objection to the planning application on the grounds of highway safety in addition to any objections put forward by Hertfordshire County Council (HCC), as Highway Authority.

1.2 Report Structure

1.2.1 The remainder of this note is structured as follows:

- Section 2 presents the key deficiencies with the TA
- Section 3 presents the key issues with the RSA
- Section 4 provides a summary and conclusion

2 KEY ISSUES

2.1 Background

2.1.1 This section provides a critique of the TA prepared by GTA in support of the planning application relating to the design of the proposed access and methodology for considering the sustainability of the site. The following sections provide a level of commentary on where Haskoning support the conclusions reached by the County Highway Authority and highlight the technical weaknesses within the supporting transport documents.

2.1.2 As has been stated by HCC, Haskoning reiterate that UK planning and transport policies are increasingly emphasising and promoting the importance of public transport accessibility as a means to reduce car dependency, meet emissions targets, and improve public health and safety.

2.1.3 A number of concerns and issues relating to sustainability were raised regarding the previous application 20/00744/OP, however HCC raised no objections, subject to a Section 106 contribution to bus services. However, as detailed by HCC, planning policies, guidance, and design requirements are not static, and over time these are all continually evolving to be commensurate with current thinking, technology, priorities, etc. In the past five years priorities in local and national policies have changed and these now give even greater weighting to ensuring developments are accessible by sustainable forms of transport such as walking cycling and in particular public transport in new developments.

2.1.4 The current application seems to have adopted a position that as the overall development proposal has not substantially changed from previous submissions, despite both previous outline applications being refused, then a transport refusal should not be considered in this current application. However, this position fails to acknowledge the fact that the transport remains a material planning consideration and any refusal on these grounds would not be new to this application site as policies and guidance change.

2.2 Planning Policy Considerations

2.2.1 The current planning submission does not comply with the latest adopted transport policies and design guidance in place for this site.

2.2.2 Within the TA, a number of statements have been made suggesting that a transport reason for refusal would not be justified. However, the polices and guidance documents being referred to justify this stance have been superseded. This is a key point to highlight as the overarching National Planning Policy Framework (NPPF) is clear that proposals should accord with up-to-date plans.

2.2.3 The applicant relies upon both Planning Policy Guidance 13 (PPG13) and the Hertfordshire County Council Highway Design Guide, 3rd edition. Both of these documents have been withdrawn and superseded with newer more up-to-date policies:

- PPG13 was withdrawn in 2013 and replaced by the NPPF. The NPPF focuses on promoting sustainable transport to deliver well-designed, sustainable and popular places.
- HCC Highway Design Guide,3rd Edition dated 2011, was withdrawn in 2024 replaced by the Place and Movement Planning and Design Guidance for Hertfordshire, adopted in March 2024.

2.2.4 As such, any reference to these documents within the TA to support the application cannot be considered as meeting the NPPF requirement.

2.2.5 In addition, to the applicant's use of withdrawn policy documents, there are other references to documents that are not relevant to this area or are older documents that have been updated with more up-to-date considerations.

2.2.6 This is most notable in relation to the documents being reference in the TA to justify why 400m to a bus-stop is not a valid 'transport reason for refusal' on this distance. Firstly, the applicant has sought to use Transport for London (TfL) guidance, this is not an adopted policy document outside of London. As well as failing to consider the much more relevant up-to-date Place and Movement Planning and Design Guidance for Hertfordshire.

2.2.7 The following sections of the TN provide a greater level of detail on where the reliance on out-of-date polices and older guidance documents, clearly demonstrates and supports the conclusion that the proposed development is not policy compliant.

2.3 Proposed Site Access Arrangement Design Standards

2.3.1 A fundamental technical weakness of the proposed site access is the reliance on the HCC Highway Design Guide,3rd Edition 2011, as noted in the TA on p17. The Place and Movement Planning and Design Guidance for Hertfordshire was officially adopted by Cabinet Members in March 2024. The adoption was significantly prior to the submission of this latest application, which was submitted in June 2025.

2.3.2 As such the design guidance stated to be the basis of the access design holds no status. This omission is a serious technical flaw as the access design does not accord with a number of fundamental design requirements required by HCC when considering an access for an outline planning application.

2.3.3 Using the 2024 adopted design guidance, HCC adopts a place and matrix approach to road function, which can be seen in Figure 2-1. Using this matrix approach the proposed new access would be classified as P2/M1 – predominantly a residential street.

Figure 2-1: HCC Place and Movement matrix

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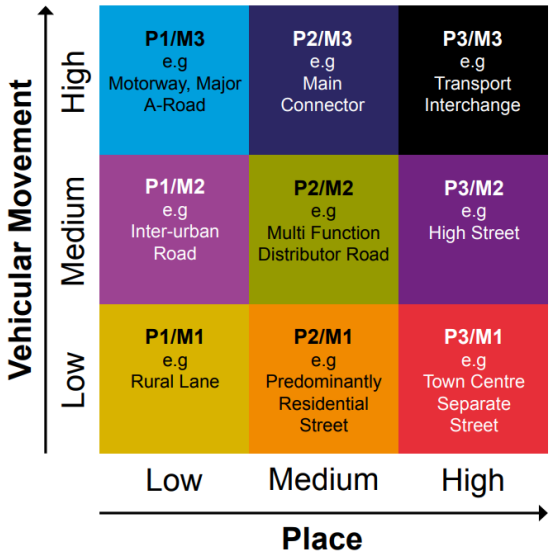
Hertfordshire's Place & Movement matrix



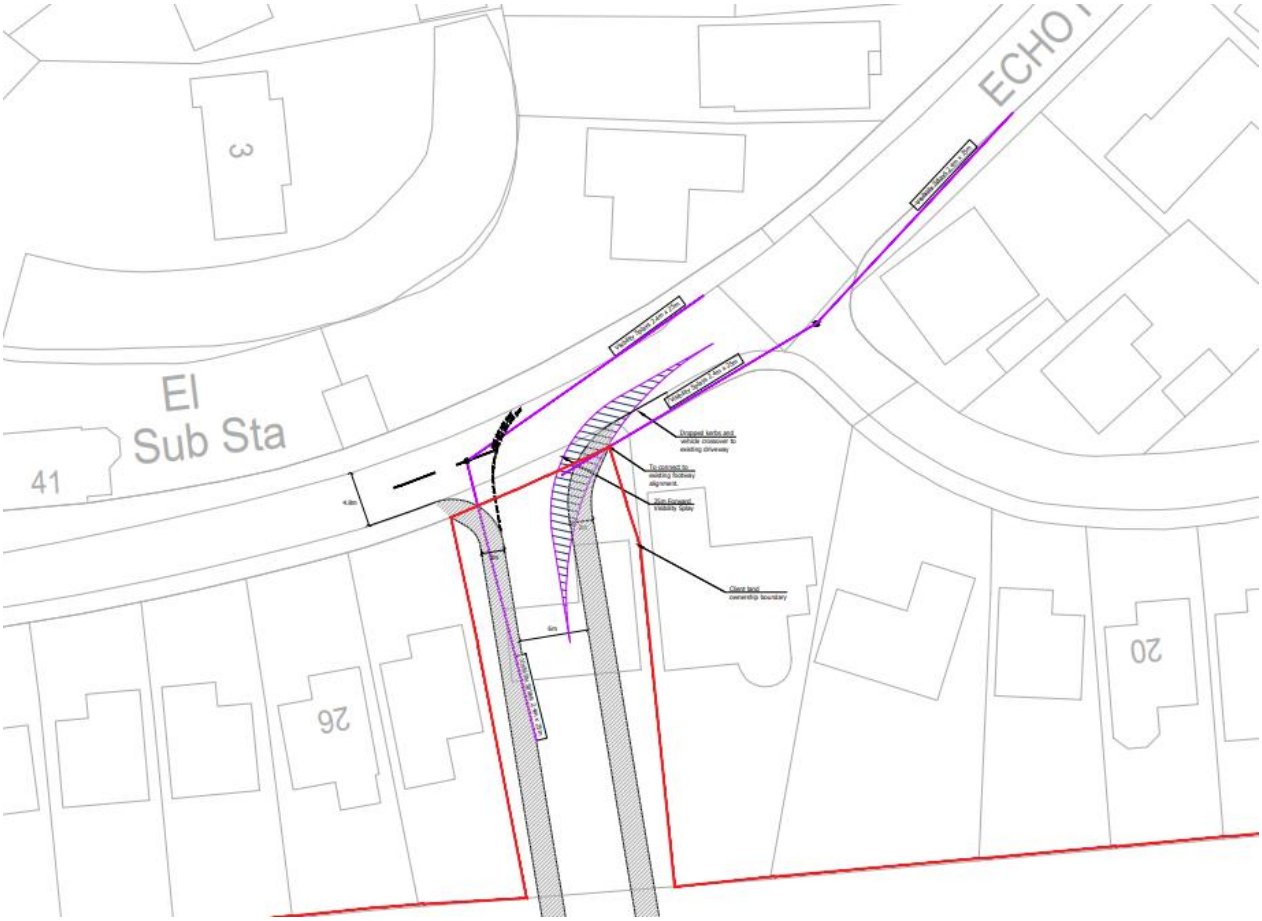
Source: Place and Movement Planning and Design Guidance for Hertfordshire, Part 3, Chapter 1

2.3.4 From a review of this up-to-date design guidance, significant areas can be highlighted where the proposed access arrangement does not conform to the required design standards. These areas include carriageway long-fall gradient, visibility splays and junction spacing; details regarding these issues are set out below

Proposed Access Layout

2.3.5 The TA includes a design for the proposed site access in the General Arrangement Drawing 13378/2101 P2 prepared by GTA Civil & Transport Consultants. Extracts of the GA Plan in connection to the site access can be seen in Figure 2-2 and the indicative section in Figure 2-3.

Figure 2-2: Extract of Proposed Access from 24 Echo Hill



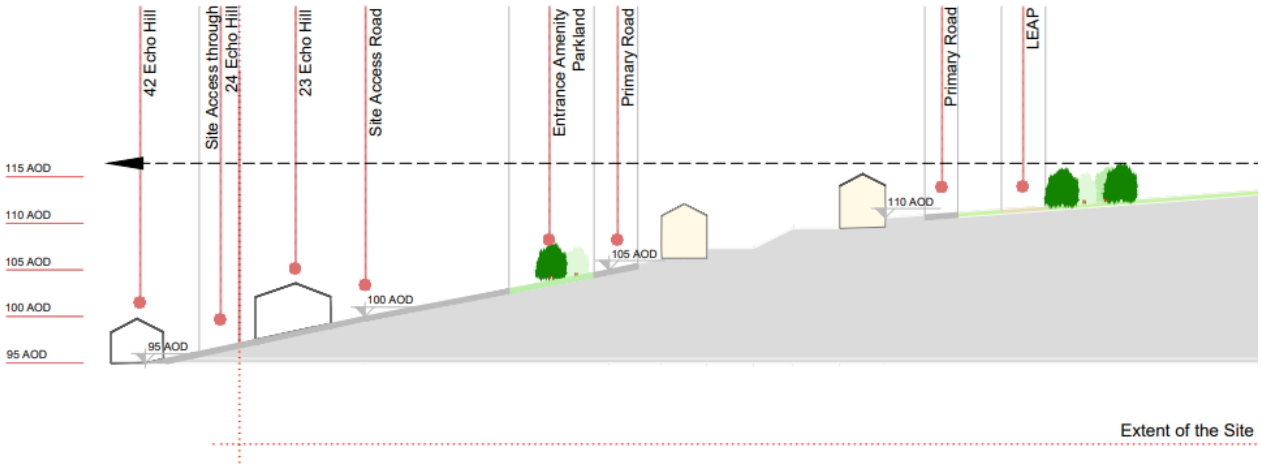
Source: General Arrangement Drawing 13378/2101 P2 prepared by GTA Civil & Transport Consultants

Carriageway Long-fall (Gradient)

2.3.6 A fundamental flaw with the proposed access arrangement is the lack of detailed information to inform whether the access meets the sustainability requirements in terms of gradient. Set out within the Active Travel England design guidance, there is a section that details topography is a key requirement to support and promote sustainable travel. This position is also defined by HCC in the latest design guidance, which requires long-fall carriageway gradients to be between 1% and 5%.

2.3.7 Whilst no detail has been submitted by the applicant in relation to the vertical alignment of the access road, the Design and Access Statement has been reviewed to identify an indicative cross section, seen in Figure 2-3.

Figure 2-3: Extract from Design and Access Statement p36 (Figure 31 – Indicative Section)



36 **Fig.31: Indicative Section**

2.3.8 The gradient between the new proposed access on Echo Hill to the proposed Primary Access Road within the site can be calculated from the cross section. This identifies that the site rises a total of c.8m over a distance of 60m, representing a 1:7.5 gradient or a 13.3% gradient.

2.3.9 To understand how gradients can significantly influence sustainable travel, such as pedestrian movements, gradients can be expressed as follows:

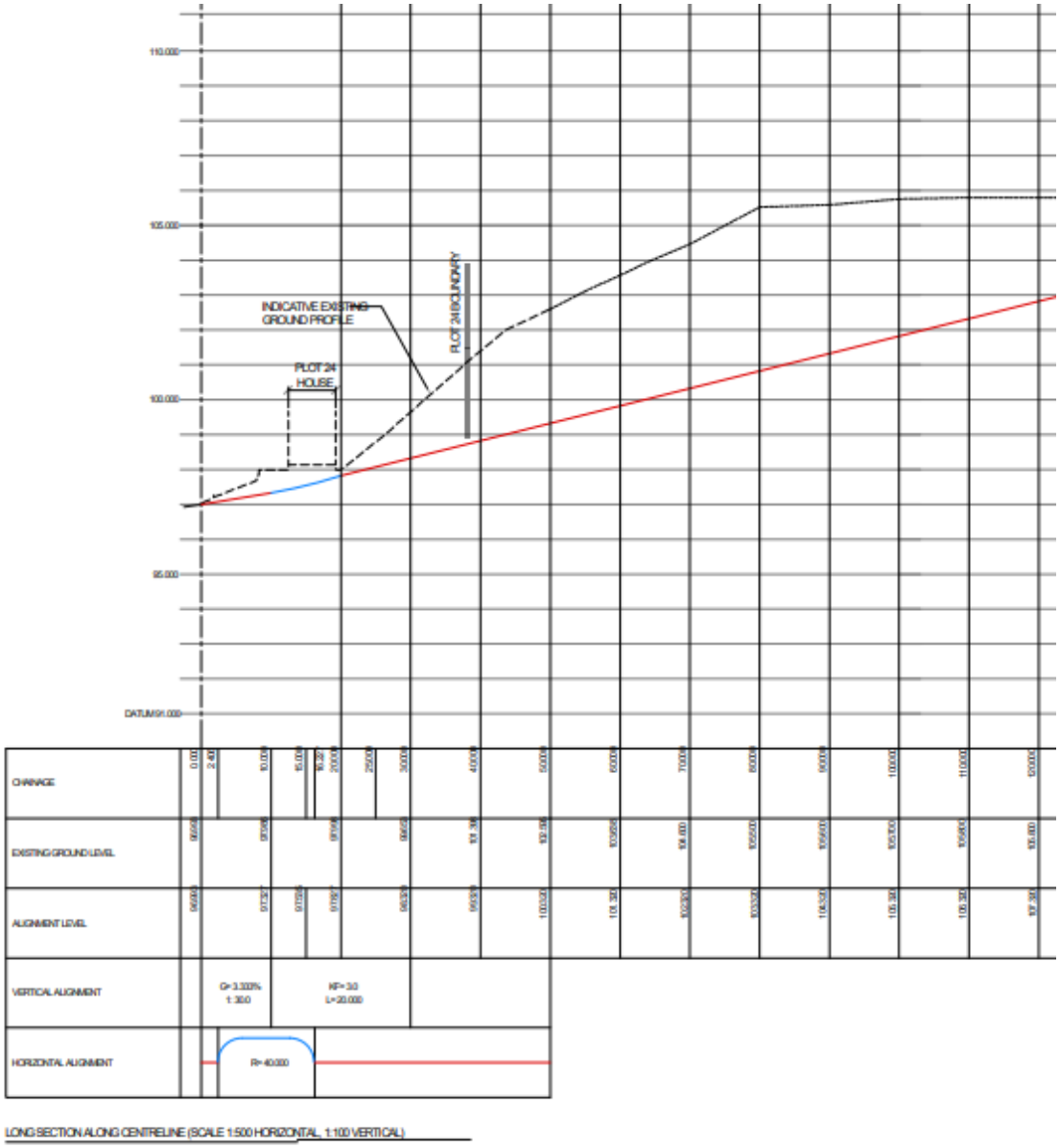
- **0-5%** (1 in 20) – very gentle and ideal for all pedestrians. Ideal for long distances and inclusive design.
- **5-8%** (1 in 25) – acceptable for most people, but may be tiring over longer distances. May require rest areas or handrails for accessibility.
- **8-10%** (1 in 10) Steep for walking, especially for older adults or those with mobility impairments. Should be avoided for general pedestrian routes unless necessary.
- **> 10%** - considered steep and potentially unsafe or inaccessible. May require steps, ramps or alternative routes.

2.3.10 The HCC guidance requires a gradient between 1% and 5% long-fall to facilitate movement for all pedestrians. Given the steep gradient of the proposed access road, it cannot be concluded that this supports or promotes a sustainable development location, as new residents are unlikely to consider walking (or even cycling) and would simply be car dependent in accessing the site, contrary to National, Regional and Local planning policies.

2.3.11 Haskoning undertook a comparison of the gradient of a compliant access road against the existing site levels, as shown in **Appendix A**. The exercise was undertaken utilising the topographic survey contained within the Flood Risk Assessment and Surface Drainage Strategy that accompanied the refused 20/00744/OP application. Given existing site levels remain consistent then the previous topographic survey is the most robust starting point.

2.3.12 Figure 2-4 summarises the review, with the black line showing existing ground levels whilst the red line shows an indicative vertical alignment of the 10% carriageway long-fall proposed for the refused 20/00744/OP application.

Figure 2-4: Visual representation of existing site levels and potential site access road



2.3.13 From Figure 2-4, it is apparent that substantial earthworks would be required to achieve even a non-compliant 10% gradient for the site access road. It is calculated there would be approximately 2.5m height difference between the level of the access road and the existing rear boundary of No. 24. No indication has been made of the substantial structures required to retain the adjacent properties in the design of the access road as part of the current submission.

2.3.14 Based on the assessment undertaken, substantial information is lacking from the current submission to prove that a viable development access can be achieved. The proposed 16% gradient is certainly not suitable. Delivery of a compliant 5% gradient would require extensive earthworks and retaining structures, that have not been included within the application.

2.3.15 Furthermore, whilst the site is located above the existing Echo Hill, no account appears to have been taken of the drainage of the access road. It would be expected that extensive measures would be necessary to avoid the run off from the new access road inundating the existing highway drainage in Echo Hill.

Visibility Splays

2.3.16 In terms of visibility splays, the proposed access does not provide the required minimum visibility splay of 33m set out in the latest HCC guidance, The proposed access has been designed to a lower 25m which does not afford sufficient or suitable visibility splays. Given the critical nature of visibility, it is surprising that this was not shown using a topographic survey rather than the OS base.

2.3.17 Vehicular swept path analysis contained within an appendix of the TA demonstrates that large vehicles would require most of the carriageway width to manoeuvre through the site access junction. Given the proposed steep gradient of the access, it is questionable whether sufficient or suitable inter-visibility could be provided to allow opposing vehicles to anticipate and stop whilst such overrunning manoeuvres occurred. In the absence of adequate visibility, the risk of collisions significantly increases, with vehicles regularly required to reverse in the vicinity of the site access.

2.3.18 No details are provided regarding pedestrian crossing points at the proposed access, as highlighted by the Road Safety Audit accompanying the TA. Pedestrian crossing points must be shown on the drawings, and including visibility splays to demonstrate existing Echo Hill residents can safely cross the proposed access.

2.3.19 Further drawings should also be provided, demonstrating the adequacy (or otherwise) of visibility for movements East to West and West to East along Echo Hill. Drawings establishing the necessary parking control measures are also required, given the scheme would be require no vehicles to be parked in the vicinity of the junctions.

Junction Spacing

2.3.20 The proposed access has also been reviewed in respect of the junction spacing requirements as defined in the latest HCC design guidance, and this has not been met with the location of the proposed access. The adopted design guidance stipulates that adjacent junction spacing should be a minimum of 33m, the distance between the access to No.s 10 to 22 Echo Hill and the proposed development access is below this minimum, measured to the centre line, of 26m.

2.3.21 The inadequate junction spacing would inevitably compromise highway safety. Furthermore No.23 Echo Hill would be positioned between the access junctions, with limited visibility, inevitably reducing the safety of manouevres into and out of the driveway.

2.4 Summary of Design Standards

2.4.1 The limited plans provided demonstrate that the proposed access arrangements would not comply with the standards required by HCC.

2.4.2 It is clear that the applicant has chosen not to detail the suitability of Echo Hill to serve the proposed development site, considered a requirement of an Outline Application that includes Access, as it is not possible. Examples of noncompliance include:

- The carriageway long-fall being over 13%, significantly above the 5% HCC design standard;
- Non-compliant visibility splay, below the minimum 33m required for a residential street;
- 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 intervisibility to enable on-coming vehicle straddling the centre line to be seen; and
- On street parking restricting the effective carriageway width.

2.4.3 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.

2.4.4 Overall, it is apparent that Echo Hill was not designed to accommodate a substantial increase in the number of dwellings it currently serves. There are currently 51 dwellings being served from the cul-de-sac of Echo Hill, which would more than double to 134 dwellings with the proposed development, increasing the risk of conflict being served from one access. It is therefore not an appropriate route to serve a new development.

2.4.5 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. This has been demonstrated with a number of the resident objections, who have included photographic images showing the existing constraints.

2.5 Site Accessibility

2.5.1 A key part of the NPPF states at paragraph 110 "*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health*".

2.5.2 Active Travel England (ATE), provides Government guidance around designing active places in accordance with the current NPPF. ATE provides a number of design assistance tools, including documents to assist councils and design professionals on what constitutes high-quality design with safe active travel infrastructure.

2.5.3 One ATE document under the masterplan heading provides site wide considerations for planning such places and under the sub-heading of 'Transport and Facilities' the following can be referenced:

> "ATE Extract from Transport and facilities:
>
> *Public transport services and facilities should be well located and accessible via walking, wheeling or cycling, ensuring easy onward interchange with public transport.* ***Bus stops should ideally be located so that nobody needs to walk more than 400 metres from their home****.*
>
> *The ease of movement for people around a place is important within the site, but the movement network must make connections to destinations, places, and communities beyond the site boundaries. The internal active travel network must connect to and enhance off-site routes, rather than create indirect routes of poor quality.*
>
> *Proposals for new places should be created around a network of high-quality, well-integrated active travel routes.* ***These routes should be of suitable width, surface and topography****, and connect to surrounding areas.*
>
> *Pedestrians and cyclists should be given priority when moving across a site. This will help create routes that are coherent, direct, safe, comfortable, and attractive. Active travel networks should form a continuous and connected grid in a development, reflecting desire lines of where people want to travel.*
>
> *Active travel infrastructure, public transport services and community facilities should be delivered early in large-scale developments to ensure walking, wheeling and cycling habits are formed as the development takes shape".* (*ATE Designing inclusion active travel schemes, 'Planning for active places' design documents for professionals, Site wide considerations – website: Site-wide considerations | Active Travel England*)

2.5.4 Haskoning have highlighted sections in bold within the above ATE guidance extract where the site wide objectives would need to be met by the application to be considered as a sustainable location.

2.5.5 The gradient is a key consideration in the ATE guidance as well as many of the withdrawn guidance documents referred to in the TA. ATE refers specifically to topography and MfS refers to areas being accessed comfortably by foot. This is a key consideration that has been overlooked in the analysis set out in the TA.

2.5.6 Furthermore, section 3.2 of the TA references PPG13 guidance, which was withdrawn in 2013 and replaced by the NPPF. The NPPF focuses on promoting sustainable transport to deliver well-designed, sustainable and popular places.

2.5.7 The TA seeks to use the upper 2km distance within withdrawn PPG13 guidance as justification to support site as a sustainable location but fails to acknowledge or include the distances that future occupiers would have to walk just to exit the site on Echo Hill. Figure 3.1 in the TA refers to a 9min walk time to Royston High Street, this takes no account of the additional time taken for future occupiers to exit the location. Even from the centre of the site, this is an additional 150m walk distance or another 2mins (if on a level gradient, which it has already been established is not provided).

2.5.8 Notably, the TA omits the wider context of commentary, where Manual for Streets states at section 4.4.1: "*Walkable neighbourhoods are typically characterised by having a **range of facilities** within 10 minutes' (up to about 800 m) walking distance of residential areas which residents **may access comfortably on foot…….** MfS encourages a reduction in the need to travel by car through the creation of mixed-use neighbourhoods with interconnected street patterns, where daily needs are within walking distance of most residents*." (the elements highlighted in bold are by Haskoning).

2.5.9 In a review of the wider area, Haskoning highlight that 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. Thus, many essential day-to-day facilities would be beyond a comfortable walking distance of 800m for all future site residents, especially given the gradient of the site, which is located at the highest point of Royston, residents would be required to walk back up to the site.

2.5.10 The applicant's position on transport matters set out in the TA misinterprets the consideration of what a sustainable development means. From a transport perspective sustainable development means creating transportation systems that are environmentally friendly, socially inclusive, and economically viable over the long term. It aims to reduce negative impacts like pollution and congestion while improving accessibility, safety, and efficiency. None of the key markers for a sustainable development can be achieved or met with the proposed development.

2.5.11 Fundamentally, the application site is very poorly located in relation to accessing essential day-to-day services.

2.6 Wider Network Connectivity

2.6.1 In a revised strategy from earlier applications, the submitted TA does not assess any existing sections of the wider network, such as Echo Hill or Sun Hill in terms of pedestrian movements. A comment is made at 3.6 of the TA:

"The streets in the area all have good quality footways with street lighting. Echo Hill and Sun Hill are both pleasant streets to use on foot, with a system of street lighting and footways both sides."

2.6.2 It is notable that no off-site improvements are set out in this latest application for any improvements to footways, cycleways, bridleways or bus services.

2.6.3 No reference is made to the narrow footways along Briary Lane, Sun Hill or Echo Hill. Instead, the TA at section 3.12 '*the walking environment along Echo Hill and Sun Hill is a pleasant route'*. This statement does not reflect the existing situation, as many of the footways are c. 1m wide, for example Briary Lane north of Sun Hill as shown in Figure 2-5. 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 these are pleasant routes if people are required to step into the carriageway.

Figure 2-5: Briary Lane looking south to Sun Hill junction and Bridleway 13

2.6.4 It is also noted that the applicant makes reference to providing connections to bridleway BW R013, as a means to offer some form of secondary access points, to be restricted to walking and cycling. 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. 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.

Cycling

2.6.5 There is a general lack of consideration for the potential for cycling trips to/from the development. In fact the TA provides not analysis or commentary on cycling in relation to the proposed development, beyond section 3.3, where is simply the site is within "reasonable" walking and cycling distances.

2.6.6 Considering the narrow nature of a number of the surrounding streets, such as Briary Lane and Sun Hill, Haskoning do not consider it to be a suitable environment for all cyclists.

2.6.7 Given the steep gradient of Echo Hill to access the development site and in recognition that the surrounding routes are effectively one lane wide for long stretches due to parked cars, there is limited opportunity to promote or encourage cycling. If future occupiers were to cycle, once on the wider network cyclists are likely to be 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. It would be expected that a full review was undertaken of existing cycle routes serving the site.

Public Transport

2.6.8 In previous planning application submissions, HCC has stated that a site location is considered unsustainable where the distance to the closest bus stop is beyond 400m. This 400m requirement is clearly stated in Part 2, Chapter 4, Section 9.19 of HCC's latest design guide:

"All occupied parts of development shall be within 400m walking distance of a bus stop or transport hub measured along the public walking route."

2.6.9 The current TA states at 3.12 there would be a 800m walking distance from the centre of the site to the nearest bus stop, double the HCC requirement. The stated 800m takes no account of the topography of the area, which would make the walk considerably less attractive. Indeed, access routes within the site may need to be considerably more circuitous to achieve the necessary 5% gradient.

2.6.10 The description in Section 3.10 of the TA of '*the short walking distance between the nearby bus stops and the site means that travel by bus is a sustainable mode of choice for residents of the site*" is clearly disingenuous.

2.6.11 Whilst Table 4.1 of the TA provides some information regarding frequency of service, it is careful not to state the number of buses in a typical or peak hour. The TA does not expand on this, instead seeking to take the stance that as the site is well located to the town centre, it would not be reliant on the bus services; this is a key weakness of the TA.

2.6.12 Furthermore, the available bus services are of a low frequency and do not present a good level of service, which 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, unlikely to be an attractive alternative to use of the private car.

2.6.13 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 inherently unsustainable, with very limited potential for new residents to use public transport.

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

2.7 Travel Plan

2.7.1 The Travel Plan submitted reflects the unsustainable nature of the development, providing only a minimal 5% mode shift from private car, but providing no significant measures by which this could be achieved. It is also highlighted that this is below the minimum 10% mode shift that North Herts require from a Travel Plan and more notable, Gladman have provide no commitment to achieving even the minimum requirements on modal shift. If there is no target or commitment to even meet the minimum mode shift, then this underpins the continued position, that the proposed site is NOT a sustainable development and cannot be made to be a sustainable development location.

2.8 Hertfordshire Highway Authority

2.8.1 It is noted that HCC's consultation response recommends refusal on sustainability grounds, broadly in line with those discussed above.

2.9 Summary

2.9.1 The TA sets out the following: "*In summary the site has a good level of accessibility and can be categorised as a 'walkable neighbourhood', being within 800metres of various key daily shops and services. Public transport services are accessible within a short walk to the bus station or a cycle ride to the railway station. This is consistent with NPPF paragraph 110, which states 'Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes*".

2.9.2 Taking into account the excessive distances to essential day-to-day services, the significant gradients to negotiate in accessing these services and the relatively poor standard of footways connecting the essential services, future occupiers are more than likely to be reliant on private car use over any sustainable mode of travel. This is the direct opposite of the conditions the NPPF is seeking sustainable development to achieve.

2.9.3 Overall, it is clear the site is not sustainably located, and the applicant has not presented any measures to address this fundamental issue.

3 ROAD SAFETY AUDIT – STAGE 1 ACCESS DESIGN

3.1.1 In addition to the TA and TP, the applicant has submitted a Stage One Road Safety Audit (RSA), undertaken by EC Road Safety Limited. In a review of the RSA, it is questioned as to whether this have followed the statutory requirements detailed in GG119 Road safety audit v2.01.

3.1.2 GG119 is commonly adopted by local highway authorities as good practice, even if they do not have their own specific RSA procedures. All RSAs within the UK (outside London) should be undertaken in accordance with GG119. The Standard provides a structured process to identify potential safety problems in highway schemes and suggest ways to mitigate them. The latest version 2.0.1 of GG119 was issued in April 2025.

3.1.3 Although an RSA has been submitted, it has not been demonstrated that the Overseeing Organisation, HCC as the Highway Authority, has either approved the CVs of the audit team, or the RSA brief. The RSA cannot be considered as undertaken in accordance with GG119 if these essential criteria have not been adhered to.

3.1.4 A key criteria of GG119 is that a site visit is undertaken by the audit team to inform the RSA. However, there is no evidence within the RSA such as recent site photographs to validate a site visit was undertaken. As shown by Figures 3-1 and 3-2, the image used on the front cover of the document has clearly been taken from Google Streetview imagery from April 2023. Evidence of consistency of image is given by the skip positioned on the driveway of No.23 Echo Hill and the maturity of the trees in the front garden.

3.1.5 If the RSA audit team and brief have not been approved by HCC as highway authority, and there is no evidence of a site visit, the RSA cannot be considered to meet the statutory GG119 requirements.

Figure 3-1: Extract of RSA Front Cover

Stage 1 Road Safety Audit

Report No. EC/2025/06/GTA2

June 2025

Figure 3-2: Google Streetview screenshot, April 2023

Source: Google Streetview, viewed 15 August 2025

4 SUMMARY AND CONCLUSION

4.1.1 This TN has been prepared by Haskoning reviewing the proposed development to the south of 24 Echo Hill, seeking outline planning permission for 84 residential dwellings.

4.1.2 Through consideration of the information presented in the TA, TP and RSA submitted with the planning application, the following concerns and technical weaknesses are raised:

1. Access Design Flaws

- **Gradient**: Proposed access road would have a steep 13.3% gradient, far exceeding the 5% maximum required by HCC, making it unsuitable for pedestrians and potentially unsuitable for all vehicles.
- **Visibility & Junction Spacing**: Visibility splays fall short of the required 33m; junction spacing is only 26m, below the minimum standard.
- **Undeliverability**: Access has the potential to rely on land not owned by the applicant (Nos. 23 & 25 Echo Hill), making the proposal potentially undeliverable.
- **Drainage & Design Details**: Lack of clarity on drainage, swept path analysis, and access to adjacent properties and Public Rights of Way.

2. Sustainability Concerns

- **Distance to Services**: Most essential services (schools, shops, bus stops) are well beyond the recommended 800m walking distance, with some over 1km away.
- **Topography**: Steep terrain discourages walking and cycling, increasing car dependency.
- **Public Transport**: Bus services are infrequent (every 45 minutes), and stops are too far from the site being well beyond the recommended 400m.
- **Cycling Infrastructure**: No dedicated cycle routes; surrounding roads are narrow and unsuitable for safe cycling.

3. Policy Non-Compliance

- **Outdated References**: The applicant's Transport Assessment (TA) relies on withdrawn documents (e.g., PPG13, HCC Design Guide 2011), and ignores current policies and standards like the NPPF and HCC guidance from 2024.

4.2 Conclusion

4.2.1 Based on the review undertaken of the submitted transport documents, it can be concluded that the proposed development is:

- **Unsustainable** due to poor access to services and reliance on private vehicles.
- **Unsafe** due to flawed access design and steep gradients.
- **Non-compliant** with current planning and transport policies.

4.2.2 In light of the above, North Herts Council are respectfully requested to raise an objection to the planning application on the grounds of the unsustainable nature of the development site and highway safety.

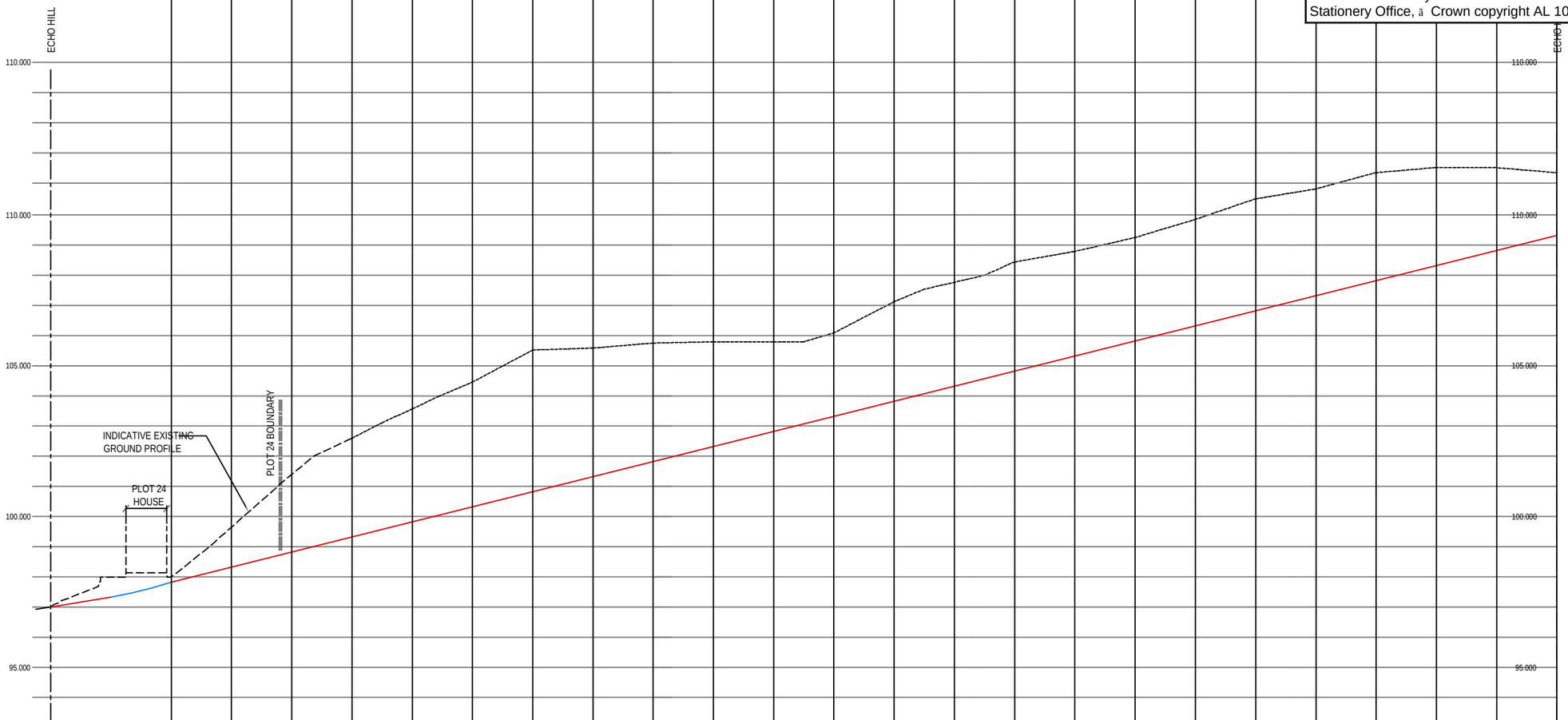
Appendix A

Proposed Development Access Road

Review of Vertical Alignment

Haskoning
Enhancing Society Together

DO NOT SCALE



CHAINAGE	0.000	2.406	10.000	15.000	16.227	20.000	25.000	30.000	40.000	50.000	60.000	70.000	80.000	90.000	100.000	110.000	120.000	130.000	140.000	150.000	160.000	170.000	180.000	190.000	200.000	210.000	220.000	230.000	240.000	250.000
EXISTING GROUND LEVEL	96.993		97.986		97.998		99.653		101.386	102.585	103.638	104.600	105.500	105.600	105.700	105.800	105.900	106.100	107.100	107.740	108.400	108.852	109.300	109.800	110.448	110.800	111.329	111.500	111.500	111.390
ALIGNMENT LEVEL	96.993		97.327	97.535	97.827		98.320		99.320	100.320	101.320	102.320	103.320	104.320	105.320	106.320	107.320	108.320	109.320	110.320	111.320	112.320	113.320	114.320	115.320	116.320	117.320	118.320	119.320	120.320
VERTICAL ALIGNMENT			G= 3.333% 1: 30.0				KF= 3.0 L= 20.000																							
HORIZONTAL ALIGNMENT				R= 40.000																										

LONG SECTION ALONG CENTRELINE (SCALE 1:500 HORIZONTAL, 1:100 VERTICAL)

TITLE	PROJECT					
CROSS-SECTION ALIGNMENT	ECHO HILL, ROYSTON					
		JOB No. PC1534	DRAWN KM	CHECKED PM	PASSED PM	
		DATE 07.12.20	REV P01	AUTOCAD REF. PC1534-0002		
		SCALE 1:500	SUIT S3	DRG No. PC1534-RHD-GE-SW-DR-R-0002		

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