



**BOROUGH OF
BROXBOURNE**

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Draft Transport Strategy Representations

**Public Consultation
8 November-21 December 2018**

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Introduction

Consultation on the Draft Transport Strategy and the Draft Local Cycling and Walking Infrastructure Plan (LCWIP) was undertaken alongside the Pre-Submission Local Plan but falls outside the scope of the Local Planning Regulations.

Details of the publicity for the consultation are set out in the Regulation 22 Consultation Statement (March 2018) which sits alongside this document. The consultee list and the publicity were identical to that for the Pre-Submission Local Plan.

A summary of the representations is presented below, followed by the full set of representations from a) individuals and b) bodies, both in alphabetical order, followed by a full set of representations. The majority of representations did not refer to paragraph numbers and therefore representations are presented in the order in which they were submitted, rather than in document order.

The representations from Hertfordshire County Council and Highways England as the transport authorities are included within this document. Hertfordshire County Council's representations are included in full here, but primarily address Local Plan transport policies and are therefore also included in the full set of Local Plan representations submitted under Regulation 22. The County Council was heavily involved in the preparation of the Transport Strategy and did not submit separate representations on the strategy alone.

Individuals and bodies who responded to the consultation

24 individuals responded as follows:

Edward Beaton, G Blythe, Mark Chaplin, Gordon Cooper, Robert Fielden, Robert Henbest, Elizabeth Kavanagh, Graham Knight, Alan Langford, Janet Lodge, Jeffrey Marr, Theo and Nicola Nicolau, Terry Pearson, Mrs Jenny Pierce, Dave Rudland, Lisa Smith, Dr David Storey, Costas Stylianides, Laurence Taylor, Andrew Turiw, Scott Ward, Lynn Winter, Michael Zannetou.

14 bodies submitted representations as follows:

Bayfordbury Estates, Brookfield Property Unit Trust, Canal & Rivers Trust, East Herts Council, Enfield Council, Greater London Authority, Goffs Oak Community Association, Hertfordshire County Council – Environment Department, Hertfordshire County Council – Public Health, Highways England, Historic England, Kings Arms and Cheshunt Angling Society, Transport for London.

The representations submitted by each of the above are included within this document.

Summary of Representations

No.	Name	Comment
1	Dr David Storey Goffs Oak Community Association Janet Lodge Andrew Turiw Scott Ward Hertfordshire County Council – Public Health Greater London Authority Mrs Jenny Pierce Historic England Elizabeth Kavanagh	General comments a. Strategy not supported by detail b. Cars and vans are the only realistic option for those who work outside the borough c. No provision for bridleways d. Inadequate publicity for the consultation e. Overpopulation must be addressed f. Refer to Healthy Streets Approach g. Funding highly uncertain h. Should take account of impacts on setting of historic assets i. Do not remove Old Pond fountain/flowers j. Impacts on Air Quality Management Areas from funnelling of traffic
2.	Kings Arms and Cheshunt Angling Society Ben Johnson Laurence Taylor Graham Knight Canal & Rivers Trust Enfield Council	Walking and cycling a. Safety concerns around shared paths b. Narrow roads make cyclists vulnerable to frustrated motorists c. Conflict between cyclists and anglers on Cheshunt North Reservoir banks d. Urgent need to improve muddy Broxbourne station path and extend south e. St James' Road unsafe for cyclists f. Seek developer contributions to planned improvements to Lee Navigation towpath g. Consider cycle improvements on A10 north of M25 J25
3.	Elizabeth Kavanagh Lisa Smith Transport for London	Rail a. Noise and vibration from more trains b. Plans of the proposed new Turnford station should be included for certainty. c. Station access proposals welcomed – continue to work with TfL d. Clarify that new stations are aspirations and feasibility work & business case are needed and should involve TfL e. Crossrail 2 should be referenced alongside 4-tracking under PT0.1 (Appendix A).
4.	Terry Pearson Goffs Oak Community Association Transport for London Mrs Jenny Pierce	Bus a. Divert the 310 to Broxbourne station b. Bus plans for Rosedale Park inadequate c. TfL needs to be involved in any future plans for Waltham Cross bus station d. New 'town' service should provide convenient interchange with Cheshunt station e. Funnelling of traffic on A1170/B168 due to right turn bans on A10 will delay buses f. Lack of detail illustrates that bus priority on the A1170/B168 cannot be achieved
5.	East Herts Council	Transport Modelling

No.	Name	Comment
	Mrs Jenny Pierce Scott Ward Brookfield Property Unit Trusts	<ul style="list-style-type: none"> a. Unclear why 2013 was selected as base year for modelling when Hertfordshire County Council 2014 base year data is available b. More recent surveys should be conducted c. Insufficient traffic count data in the area d. Table 11.1 (Table A) does not indicate comparative times on the A1170/Waltham Cross route e. PM peak outside webtag guidelines f. Base model journey times in Table 11.1 (Table A) does not reflect actual travel times
6.	Kings Arms and Cheshunt Angling Society Robert Fielden Michael Zannetou Mrs Jenny Pierce Costas Stylianides G Blythe Theo & Nicola Nicolau East Herts Council Scott Ward Mark Chaplin	<p>College Road and Church Lane right- turn bans</p> <ul style="list-style-type: none"> a. Inconvenience to local residents b. Increased traffic noise c. Funnelling of traffic onto A1170 via Winston Churchill Way undermines multi-modal corridor aspirations d. Safety concerns due to queueing on A10 at Park Plaza as more traffic loads onto Winston Churchill Way e. A10 congestion diverts traffic to A414 f. Other at-grade options not considered e.g. right turns with extended slips g. Emergency vehicles can't get through h. Exacerbated problems on Blindmans Lane – which has not been modelled i. Loss of existing pedestrian A10 crossings j. Carterhatch Lane and Southbury Road in Enfield work fine without right-turn bans k. High cost of modifying College Road pedestrian footbridge
7.	Gordon Cooper Alan Langford Hertfordshire County Council	<p>20mph speed limits on Old A10</p> <ul style="list-style-type: none"> a. Will make area less attractive for business b. Extend A1170 20mph zone along Ware Road c. Restore traffic posts on Hoddesdon High Street to shut alternative to 20mph bypass d. Will increase congestion e. Incompatible with HCC speed management strategy
8.	Dr David Storey Goffs Oak Community Association Robert Henbest Jeffrey Marr	<p>Goffs Oak</p> <ul style="list-style-type: none"> a. No solution to the Cuffley bottleneck b. Traffic light at Goffs Oak inadequate/will make matters worse c. No capacity to upgrade east-west transport links serving Goffs Oak d. Goffs Oak will be cut off due to congestion at both Cuffley and Lieutenant Ellis Way. e. Lacks detail on proposals for Goffs Oak village centre
9.	Goffs Oak Community Association	<p>Rosedale Park</p> <ul style="list-style-type: none"> a. Development (e.g. Rosedale Park) in 'rural' rather than urban areas makes no sense b. Already congested roads in Goffs Oak area cannot cope with Rosedale Park development proposals

No.	Name	Comment
10.	Dr David Storey Enfield Council	Park Plaza/M25 Junction 25 a. Does not take account of flows in Enfield b. Unlikely that additional development would have no impact – further discussion welcome
11.	Brookfield Property Unit Trusts	Brookfield a. Proposed interventions insufficient to accommodate proposed level of growth b. Rat-running via Whitefields Road c. 2033 scenario worse at key junctions with mitigations than no mitigations d. Does not prioritise sustainable transport
12.	Laurence Taylor Edward Beaton Dave Rudland Scott Ward	Cheshunt Lakeside a. No plan to accommodate extra traffic b. Windmill Lane and Old Pond junction already congested c. No plans to improve vehicular access from development to the A10 d. Make Windmill Lane/Cadmore Lane into a 1-way system via Delamare Road

Representations from individuals, in alphabetical order

Submitted by	Comments - individuals
Edward Beaton	<p>I would make the following comments on your strategy which does not seem to have taken into account the proposed Lakeside development of 1750 new homes at the old Tesco HQ area.</p> <p>There is no provision for improved road links via Cadmore lane or windmill lane to provide exits from lakeside and access to other routes A10 in particular. Traffic is already bad from windmill lane trying to get onto the old A10 at the pond roundabout and is often backed up down windmill lane for some distance. A revised junction is needed as the present traffic lights do not work satisfactorily now let alone if 1750 new drivers try to get out from lakeside at the weekends. Windmill lane needs to link directly to the Pond roundabout to provide a continual flow of traffic from Windmill Lane.</p>
Edward Beaton	<p>The proposed right turn restrictions on the A10 will mean any traffic from Enfield trying to get back to Lakeside will have to either exit at Lieutenant Ellis way roundabout and go into the Waltham cross roundabout to go along the old A10 (proposed 20mph route) or continue along the A10 to the Brookfield farm exit and work its way round to Halfhide lane. The old A10 is already gridlocked in rush hours and will not be able to cope. The proposed right turn ban at college road should be dropped or maybe have a new roundabout there.</p>
G Blythe	<p>I have been reading the Borough's transport strategy plan and as far as I can see it has a major flaw. You intend to ban right turns off the A10 coming from London and into College Road. How therefore are vehicles heading for the station and hundred and new homes planned for Delamare Road going to gain access. The only routes I can see are from the Turnford turn off or straight along the High Road from Waltham Cross. Surely this is going to overload that lower road considerably [with] traffic going along it where at present this is not necessary. Bearing in mind you intend to put a 20mph limit on this road to improve safety this new proposal makes a mockery of that plan. Please look again at your proposal for as far as I can see your proposal makes no sense at all.</p>
Mark Chaplin	<p>The proposals to prevent right hand turns onto the north bound A10 at both central Cheshunt junctions, College Road and Church Lane would be cause unreasonable difficulties to north bound travellers without significantly reducing local congestion.</p> <p>This traffic from the central area of Cheshunt would be funnelled along the high street towards Turnford overloading an already congested street and is likely to increase the risk of traffic gridlock in the Old Pond area during peak periods.</p>
Gordon Cooper	<p>I wish to suggest that 20 mph speed limit on old A10 is wrong. Cost far too much time for travel, make area less popular because of inconvenience leading to bankrupt businesses, more unemployment and less business rates.</p> <p>30 mph limit is fine.</p> <p>The A designation states it is a main road, not suitable for a 20 mph limit</p>
Robert Fielden	<p>I wish to register my concerns (objections) to the proposed changes to the College Road/A10 junction ref HS 05. This is a major junction used to access Cheshunt (Old Pond area) and West Cheshunt (Churchgate area). The proposed banning of right hand turns at this junction have not</p>

Submitted by	Comments - individuals
	<p>considered the traffic chaos caused by the local traffic re-routing created by banned turns at this and other junctions namely Church Lane/A10 junction ref HS 06. There is also a high cost of modifying the pedestrian bridge at this junction and on the provisional drawing the changes will affect the bridge users. This bridge is well used particularly by school children from the school in College Road. Please will you send me information on any decisions resulting from this consultation.</p>
Robert Henbest	<p>Cuffley Hill/Goffs Lane (B156 Corridor) – paras 8.3.11/12</p> <p>This road is a key part of the main east/west route in the south of the Borough - B156, B 190 and A121 into Essex and westwards to the A1000 at Potters Bar. Housing proposals in the Broxbourne Local Plan are for some 1,000 houses in the immediate vicinity of this route and there are prospectively some 500 or more on the Cuffley stretch. It is extremely busy for the two hour morning and evening rush hours, with many snarl ups. It beggars belief that all that is proposed to meet this potential increase in traffic is a traffic light in the centre of Goffs Oak!</p>
Ben Johnson	<p>I think the overall development strategy and transport plan overall is very forward thinking.</p> <p>It would be good if the new section of path from St Catherine for the station could be extended down to the park on Meadway as it's in poor condition and pools water at the bottom of the gate. A lot of mums use it to get to school. When is the work to the path likely to start?</p>
Elizabeth Kavanagh	<p>As a resident on Thomas Rochford estate my concern- albeit a selfish one- is the increase in train traffic. If I am reading figure 6.1 correctly there will be a n increase from 8 to 22 trains per hour. What are you planning to do to protect our homes from even more vibration and noise?</p> <p>Very concerned that you have yet to decide where to place Turnford station. When a definite decision is made how will residents be informed?</p> <p>The old pond may be quaint but it is so wonderful to have a water feature in the centre of town plus the beautiful flower displays. Please do not use redevelopment as an excuse to remove the pond water feature.</p>
Graham Knight	<p>I have looked at the Draft Local Cycling and Walking, Infrastructure Plan mainly from the point of view of a regular and experienced cyclist and have been concerned mainly with how the plan would facilitate utility cycling by adults.</p> <p>I note that the aim is to "provide a network of priority cycle corridors to make cycling a safe and convenient alternative to the car for local trips to key destinations". I support this aim. However, the key word is "convenient". Too often cycling "facilities" serve only to kick cyclists of the convenient road route and leave them bouncing up and down kerbs and giving way at every junction.</p> <p>The key thing to remember is that cyclists and pedestrians do not mix! Pedestrians do not expect to maintain lane discipline, when walking in groups they expect to use all the space available to them (and to their dogs). They are not in the habit of monitoring the path behind them in case a bike is approaching. I don't blame them for this - it is exactly how I behave when I am a pedestrian.</p>

Submitted by	Comments - individuals
	<p>Cyclists, on the other hand, tend to travel a consistent course maintaining a roughly constant distant from the edge of the carriageway and a steady speed. They are much less manoeuvrable than pedestrians; they need time to stop and space to turn. Bikes take time and effort to get up to speed and "convenience" depends on their being able to roll along at that speed for as long as possible. Having to slow or stop to negotiate pedestrians is the very opposite of convenient. The same goes for having to concede right-of-way at every junction.</p> <p>Pedestrians tend to travel at around 3 mph. Cyclists travel at 10 mph and upwards - some can cruise comfortably at 20 mph. In an urban area bike speeds are closer to car speeds than they are to walking speeds. I notice you foresee an increase in cycling with the introduction of electric-assist bikes. You may well be right - but can you imagine the feelings of someone who has forked out £1000 for an e-bike (capable, as you say, of an easy 15 mph) only to discover that Broxbourne expects them to dawdle along at 3 mph whilst politely waiting for a pedestrian to regain control of her dog?</p> <p>Unfortunately, a large proportion of your proposed cycling routes are designated as "foot/cycleway". It is extremely that cyclists who simply want to get from A to B as quickly as possible (especially those on e-bikes) will not use these. This will lead to aggression from some motorists who feel that cyclists should be off the road and using what has been provided for them - an aggression I have frequently encountered myself. Council Tax payers will not thank you for spending money on facilities that are not used.</p> <p>Unfortunately, to encourage utility cycling you need to make it attractive and convenient for cyclists to follow the existing road routes. On-road cycle lanes can certainly help here but:</p> <ul style="list-style-type: none"> • They must be continuous; • They must have the same right-of-way privileges as the roads they follow; • They must be wide enough. <p>On page 46 you show pictures from Enfield which shows the sort of thing that is needed. However, the Enfield scheme also includes some seriously bad ideas:</p> <ul style="list-style-type: none"> • Crazy schemes directing cyclists between buses and bus shelters • "Armadillos" along the edge of cycle lanes (negotiating these whilst trying to move into the main traffic stream - looking behind and signalling at the same time - is a nightmare). <p>Finally, you mention the use of narrow roads to calm traffic. This is a very bad idea from the cyclist's point-of-view. It leads to frustration from motorists who cannot pass a cyclist because there isn't room and dangerous overtaking from motorists who do so despite there not being room. If you want to calm traffic use cameras. Don't expect vulnerable road</p>

Submitted by	Comments - individuals
	users to do the job.
Alan Langford	<p>1. As a result of the 20mph scheme along the A1170, some localised re-routeing is observed in Hoddesdon.</p> <p>There are some places in the report where the human response to previous changes in road layout is mentioned. Many complex and expensive mathematical tools have been used to generate this plan, but nowhere do we see a tool being used to predict the traffic flow changes in response to typical human behaviour arising from the changes. A real example of this is seen in the Hoddesdon town centre and its traffic bypass route.</p> <p>To get traffic out of the shopping centre high road in front of the library, moveable traffic posts were placed in the high street and a bypass was built to allow traffic to flow past Sainburys with an added incentive of a 40mph speed limit. This worked fine. Then for some inexplicable reason, the speed limit was dropped to 30mph on a section of the bypass and the traffic posts were lowered permanently. I put in a complaint about the resultant enormous increase in traffic through the town past the library and through an essentially pedestrianised area. The response was an official observer visited ... on a market day ... so he said his observation was not typical.....really ?. No follow-up has been received which confirms my observations are correct. This morning my wife was almost hit by a speeding boy racer charging past the library as he took his short cut from the Golden Lion to the Sun roundabout. And now the plan is to make an even greater incentive to this behaviour by reducing the speed limit on the bypass to 25mph and leave the limit through the town centre at 30mph. How crazy is that. Section 6.2.5 of the report does not even mention this ... report writer's 'blind spot'.</p> <p>2. Speed reductions on the old A10 (A1170 and B176) between Hoddesdon and Waltham Cross, and creation of a more pleasant environment for pedestrians and cyclists.</p> <p>There is no mention of the impact of a new roundabout - for the new housing estate - in the link road from the Sun roundabout and the A10. This is bound to be an incentive for northbound drivers to avoid the link road and continue up the A1170 to the Amwell roundabout and join the A10 there. Thus increasing traffic density on the Ware Road. The Ware Road north towards the Amwell roundabout is not shown as in your 20mph scheme as being reduced to 20mph, yet...</p> <ol style="list-style-type: none"> a. There is already 'fast' traffic [>30mph] using this road, b. I often miss an approaching bus as the traffic is so heavy and fast on the Ware Road, I can't get across in time. c. The Roseland school has found it necessary to put their own signs on this road. <p>The 20mph zone should be extended along the A1170 to the speed boundary just past the St Margarets Road.</p> <p>4. Speed limits.</p>

Submitted by	Comments - individuals
	<p>A lot of credence has been put on a speed reduction from 30mph to 20mph on the A1170. Here is a simple example to explain how speed limits work. The actual time a vehicle is occupying a particular stretch of road is $\text{Time} = \text{Distance}/\text{Speed}$.</p> <p>As the number of vehicles on the road at any particular time is fixed, then <u>doubling</u> the vehicle speed, halves the time the vehicle is on that stretch of road, and so halves the traffic density. Job done.</p> <p>Conversely, <u>halving</u> the speed, doubles the traffic density on that bit of road. The report proposes to reduce the speed limit on the A1170 to 20mph with predictable results.</p> <p>In general, traffic will find its own optimum or maximum based on traffic and weather and visibility conditions and not just displayed speed limits. Each road will have its own optimum speed for minimum traffic density. Has this been calculated? In spite of all the tools available, suspect not.</p>
Janet Lodge	<p>I notice there is no mention of bridleways and safe routes for horse riders carriage drivers being created.</p> <p>Please can this be looked at for a multi access track through the developments especially brookfield development and the new plantation Woods and cheshunt park candlestick lane and the boundary around cheshunt park a super bridleway could be created around there.</p> <p>It is so dangerous on the roads now so it would be fabulous if the council could create some spectacular bridleway routes to enhance the housing developments and increase recreation opportunities.</p>
Jeffrey Marr	<p><u>Page 106, para 7.6.4</u></p> <p>I notice in the documents at Goffs Oak library that page 106, par 7.6.4 proposes 'the removal of the existing mini roundabout and service road, and replacement with a signalised junction and improved public realm.'</p> <p>Can you please advise</p> <ol style="list-style-type: none"> a) which service road this refers to? b) the timeframe for such changes to be made? c) if and when local residents and businesses are likely to be consulted on the proposed changes?
Theo and Nicola Nicolaou	<p>Overall we are excited to hear about the plans and we believe that it will no doubt benefit Cheshunt, Theobald's Grove and the wider area. However, we do have some major concerns about specific parts of the plans which we wanted to raise:</p> <ol style="list-style-type: none"> 1. No right turn on/off the A10 - this is the biggest concern for us. Having lived in the area for the last 18 months we have seen that when there is traffic on the A10, the local roads around Cheshunt, the Pond, Theobald's Grove and surrounding areas become very congested. Our concern is that banning any right turns on/off the A10 will have a huge impact on traffic in the surrounding areas and will make getting in and out of Cheshunt very difficult and time-consuming. We urge you to reconsider this proposal. 2. With the increase in homes, it is surprising that there is no mention in the strategy about new doctors' surgeries, hospitals or schools to

Submitted by	Comments - individuals
	<p>accommodate for the increase in the number of people living in the Cheshunt/Theobald's Grove area. We are requesting further open communication about this aspect of the plans.</p>
Terry Pearson	<p>Congratulations on the comprehensive document. One comment on the bus strategy. The 310 bus service transverses the Borough north to south and vice versa but calls at only one railway station- Theobalds Grove. This service should be diverted to call at Broxbourne Station in both directions. This would replace many car journeys to the station and be a positive contribution to an integrated transport policy. Calling at Cheshunt station would also help but there are no turning facilities there at present. I hope this is a positive suggestion to your consultation.</p>
Mrs Jenny Pierce	<p>I am writing to object to the Broxbourne Transport Strategy.</p> <p>I have read with interest the proposed Transport Strategy and had high hope that it would contain well-considered proposals to deal with issues involving congestion in the Borough. Unfortunately I do not believe that the Strategy nor its evidence is sound.</p> <p>The baseline assumptions underpinning the Strategy are fundamentally flawed. The Transport Strategy uses a 2013 baseline despite more up to date data being available. The Transport Strategy states (Table A) that the base year southbound journey between the Dinant Link Road and Junction 25 of the M25 in the morning peak takes 9 minutes 32 seconds. I challenge you to travel at peak time between the Dinant Link Road junction and the M25 and do it in only 9 minutes and 32 seconds. This is completely inaccurate and unfortunately undermines the validity of the assessment as a whole. Using this route every single day both at peak and off-peak times, the time taken to do this journey is actually nearer the 20 minute mark (off-peak) and sometimes 40 minutes if not more during the am peak. The 2033 local plan growth without mitigation time of 25 minutes is therefore a gross underestimation and the local plan growth with mitigation option of 12 minutes will never be achieved unless all signal junctions are removed and the speed limit increased to 70mph for the entire distance.</p> <p>This is confirmed by the COMET report (Broxbourne Transport Strategy & Local Plan Mitigation Assessment, Aecom, 2.2.3) which states that the southbound am peak model is not webTAG compliant, is not validated and the delays are under estimated. It also says (section 3 and 4.1.2) that the COMET report has been manipulated to be consistent with the WYG Report which uses inaccurate data using a SATURN model. The fact that the County Council model has been changed to be consistent with an inaccurate model that is not webTAG compliant calls into question the validity of the COMET model as a whole. The COMET model should be completely independent otherwise it undermines the role the model has in assessing local plan growth across the County as a whole.</p> <p>Regardless of this, the Strategy appears to be focussed on the single intention of increasing flow on the A10. This will have the effect of</p>

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	<p>releasing latent demand for this route and will increase the attraction of this route for through-journeys.</p> <p>The Technical Study explains how alternative scenarios to the proposed strategy have been assessed. Unfortunately the scenarios tested are extremely limited in that the strategy has tested only two options for junction changes: an underpass option or the banned right turns. The strategy should also have tested improvements which include making proper right turn lanes with extended slip roads. There appears to be enough road width to increase the north-south arms to three and four arms, yet no option was tested which increased the length of the current right hand turns. On the east-west axis, again, there is sufficient road width to have two lanes entering Church Lane and College Road. Why was there no design which considered using one of these lanes as a dedicated right turn lane? This would actually improve the flow of vehicles exiting these roads onto and across the A10 as these vehicles currently get held up behind the cars waiting to turn right. At Church Lane for example only three cars need to be waiting to turn right and the rest of the traffic is held behind it, causing congestion which frequently backs up to the mini-roundabout on the High Street/ Church Lane junction. Instead of having a two into one entrance to this road, one of these lanes could be a right turn lane to enable cars to access the A10 easily.</p> <p>Having discounted easily the more expensive option of a flyover or underpass, alternative junction designs at grade should then have been tested. Normally an engineer would have suggested this. It is therefore strange that the Council have decided that the banned right turns was the only approach to be tested. The Strategy states that the only negative impact arising from the banned right turns from College Road and Church Lane will be slightly longer journeys for those living in these roads. This is a gross understatement illustrating a complete lack of understanding of the role these roads have in the network as a whole.</p> <p>I have spent hours poring over the modelling that sits behind the strategy. Each and every model scenario showing the 'do something' options shows a significant increase in vehicles being re-routed to minor roads on either side of the A10 (the High Road/A1170 and the B156/B198). One of the roads also detrimentally impacted is Blindmans Lane. This road contains access to hundreds of homes as well as a large primary school and two nurseries. If there is a problem on the A10 and or the High Road through Cheshunt, Blindmans Lane is used as a cut through. During peak times this road is reduced to one lane due to parked cars and the ensuing chaos has already resulted in injured children, damaged vehicles and daily road-rage incidents not to mention poor air quality and an unsafe walking environment as cars mount the kerb to pass. The increase in cars using the local road network as a result of not being able to access the A10 will make these situations untenable.</p> <p>Unfortunately, the Transport Strategy makes no reference to this situation as it states upfront that these routes have not been assessed and the COMET model run says that despite visually apparent evidence, local road flows will be improved because of the introduction of a 20 mph zone along</p>

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	<p>the high street. Yet section 6.2 of the COMET report states that the banned right turns will cause re-routing of traffic onto alternative routes, including through Nazeing and Waltham Abbey, in Essex, which is a considerable detour, with more vehicles trying to avoid the A1170 as a result of the resultant delays caused by the junction proposals. How is this acceptable? Again, there are too many inconsistencies between the evidence reports which undermines the legitimacy of the Strategy as a whole.</p> <p>There have been several incidents in the last year which serve to illustrate how the closure of even one of the right turns on to the A10 has an extremely significant impact on the rest of the local road network. Frequent road works and crashes at the junctions have caused gridlock on all routes in Cheshunt. This is by no means an exaggerated use of the word. I am not talking about having to wait for 30 seconds behind a parked car or at a junction. The lack of yellow boxes or 'keep clear' markings on other junctions means that the inherent selfishness of drivers exacerbates any such situation so that nothing moves. Just two weeks ago the whole of Blindmans Lane and the Cheshunt High Street was solid for the whole day as a result of one set of road work traffic lights on the high street.</p> <p>The Strategy makes provision for improved pedestrian crossing points at Church Lane. This would require phased red lights in order to enable the safe crossing for pedestrians. It is unclear why the junction cannot be designed and modelled to test how improved right hand turns could operate with the phased red lights for pedestrians. This solution would be no more expensive than the current proposal, yet would solve issues related to the diversion of vehicles along the A1170 and B156/B198).</p> <p>There is sufficient road width to increase the number of lanes at the College Road and Church Lane / A10 junctions both northbound and southbound. If one of these lanes designed to provide for a right hand turn this would have the beneficial effect of distributing the number of vehicles which currently have to leave at College Road over two junctions. This would also reduce vehicle traffic using the A1170, making the walking and cycling strategy and proposed bus priority proposals more likely to succeed.</p> <p>The current proposals which ban right turns from the A10 will force all Cheshunt residents on both the east and west of the A10 to have to leave the A10 at only the Park Plaza roundabout and travel along the A1170 or B198. Frequently these routes are heavily congested at peak times, with traffic backing up the entire length of both Winston Churchill Way and Lieutenant Ellis Way. In the pm peak traffic heading east along Winston Churchill Way frequently queues back to the Park Plaza roundabout as a result of congestion in Waltham Cross and the A1170. On many occasions this this also queues back to Junction 25 of the M25. Traffic light control at this junction has been changed to try to prevent congestion on the Jct 25 roundabout itself and to prevent vehicles from queuing on the slip roads. However, with the installation of a dedicated northbound slip road from the M25 onto the A10 which is designed to</p>

Submitted by	Comments - individuals
	<p>prevent highway safety issues on the M25, there will be no means of controlling the flow of vehicles heading northbound until the proposed 'hamburger' at Park Plaza. The modelling shows that traffic flows will be increased significantly on this route as a result of the banned right turn at College Road. I fear this will increase the frequency of queuing back to the M25 which will have a severe impact in terms of highway safety.</p> <p>The Strategy aims to increase modal shift onto buses and trains. The Strategy therefore tests how long it will take to drive between high destination locations such as Park Plaza and Cheshunt Train Station. This seems odd. If you are travelling by train you would not be able to drive to your destination and there are no bus routes proposed that would make this route. The Strategy has not tested the time it takes to travel along the secondary north-south routes of the A1170 and B168/B198. There should have been an appraisal of the impact of the proposals on the journey between Waltham Cross and Hoddesdon using only the High Road. I assume this obvious alternative route has not been tested because it would highlight the detrimental impacts that will arise from the proposed junction changes.</p> <p>The Strategy makes much ado about the increase in bus priority along the A1170, yet fails to show diagrammatically how or where this will be achieved, or how this will be funded. There is insufficient carriageway width along this route to enable cycle routes, bus lanes and normal vehicular lanes. Indeed, there is insufficient carriageway width to install cycle lanes along much of this route. The lack of detail illustrates that bus priority cannot actually be achieved. In fact the increased volume of traffic being forced to use this route will only serve to delay buses, thereby undermining any attempt at increasing patronage. I know people that already walk between Cheshunt and Waltham Cross rather than get the bus as it is quicker than when there is congestion.</p> <p>With the increased level of traffic comes the propensity for congestion. Congestion results in standing, idling traffic which worsens air quality in the vicinity of the road. There are seven AQMAs in the borough, several of which are by schools and where large numbers of pedestrian activity occurs. The Strategy provides a high level consideration of the benefits of the proposals on a number of ambitions, ne of which includes air quality. Interestingly the only proposals that improve air quality are the creation of the new rail stations and bus priority schemes, neither of which have been designed, costed or the source of funds identified. It is important to highlight that none of the junction proposals listed in the Strategy is considered to have a beneficial impact on air quality. The Council is required by law to address air quality issues yet surprisingly there is absolutely nothing in the strategy which provides evidence to suggest that AQMA conditions will be maintained or improved. This is a serious failing.</p> <p>The Strategy also makes much ado about increasing connectivity between residents east and west of the A10. This is why new crossing points are proposed at the junctions for pedestrians. The Aecom Report (January 2017) however, highlights that the proposed junction changes at Church Lane and College Road will increase east-west severance caused by the</p>

Submitted by	Comments - individuals
	<p>A10. Yet this is ignored by the Transport Strategy which says that all east-west movement is improved with decreased severance. This apparent inconsistency between the expert reports that are supposed to form the basis of the strategy is very worrying and again leads to the conclusion that the strategy is fundamentally flawed and has ignored the basic evidence.</p> <p>I am very concerned that the proposals at College Road will require the demolition of the pedestrian bridge. Even if this is to be replaced there will be a significant period of time during which no safe pedestrian crossing is available at this location. This bridge serves Cheshunt Churchgate and Goffs Secondary Schools as well as all other east-west pedestrian movement at this junction. The Strategy should detail how safe access will be provided should changes to the bridge be required.</p> <p>As a main arterial road, the A10 should be the road that takes the bulk of the traffic. Why does the Strategy seek to prevent vehicles from accessing this route? The Strategy is a very expensive Strategy which is designed to alleviate flows during only two period of the day. There are only three locations which cause delay on the A10 north of the M25. North of Church Lane the A10 is free of any at grade junction until it reaches Buntingford and there are no signalised controls until Royston. Yet this Strategy seeks to spend over a £130 million to reduce journey times by a few minutes at peak times at these three junctions at the expense of all other routes in the Borough. The banning or right turns will result in vehicles needing to circumnavigate local roads in order to access the A10, which will result in congestion throughout the entirety of the day. Is this justified expenditure when the detrimental impacts will be severe?</p> <p>The Strategy seeks to widen the A10 at the junctions but there is no carriageway width available beyond the junctions which result in the need to merge three lanes into two or four lanes into three. These merge points heading northbound coincide with a well-used signalised pedestrian crossing point and access to a petrol station. Southbound, the merge south of College Road coincides with an access point for a residential estate. I have serious concerns that the interaction of all these elements will result in collisions and further delays. One only has to look to the A10 in Enfield where there are many three into two junctions to see that this does not improve flow through the junction as the action of merging actually slows vehicles down and causes a backing up of vehicles through the junctions themselves.</p> <p>There is a significant deficit between the funds secured for this Strategy and the total anticipated costs involved. The restrictions on pooling of financial contributions will prevent sufficient funds being gained from development. There is no CIL in place and the Plan states that strategic development sites will be expected to provide S106 contributions rather than CIL even if CIL is adopted by the Council. There are strict rules set out in Circular 5/05 which state that contributions can only be used to make the development acceptable in planning terms. Each of the strategic sites will be required to pay for significant infrastructure on-site and in the immediate vicinity. They will not be able, nor could the Council expect</p>

Submitted by	Comments - individuals
	<p>them to contribute towards the junction schemes as they are not directly related to these developments. There is therefore serious doubt that the Strategy can be funded through development and there is no agreement from Highways England, Transport for London, the Local Enterprise Partnership or the County Council to fund any of the schemes.</p> <p>To conclude, the Transport Strategy is based on flawed, inadequate evidence. It is driven by the ambition of making improvement only to north-south journeys on the A10 to the detriment of all other routes, which have not been considered appropriately in the testing. This will undermine the ability of other strategies which aim to increase modal shift to non-motorised means.</p> <p>It is not clear how the Strategy is to be taken forward. Where do these comments go and how and when are they considered? Are they included in the package of documents that you submit to the Planning Inspectorate as this is the proposed strategy which underpins the mitigation required to make the Plan sound? If they are not then the Inspector will not have full disclosure over the issues raised about this strategy. I do not have an issue with the planned growth proposed in the Local Plan and I support aims to increase patronage of passenger transport networks. However, there is a significant lack of proper assessment of the impacts of growth, including background growth. There are significant inaccuracies and inconsistencies between the many disparate pieces of evidence that feed into the Strategy. Therefore the Strategy is not a sound, effective or justified piece of evidence. By definition, if the mitigation will not achieve what it intends, the Plan must also be found unsound.</p>
Dave Rudland	<p>Don't know if this suggestion will get through, but here goes. With all the future building work going on at Cheshunt Lakeside. Can I suggest that Cadmore Lane be made 1 way down to Delamare Road. Delamare Road be made 1 way to Windmill Lane & Windmill Lane be made 1 way to the Pond roundabout. There would be no right turn into Windmill Lane from the Pond. Windmill Lane would be 2 way down to the car parks at Lora Trot Center with Access only to Moxom Avenue with no left turn from there into Windmill Lane.</p> <p>No Right turn into Forest Road & No Right turn out of Forest Road.</p> <p>Cadmore Lane for the most part usually works out to one direction single line traffic most of the time, it just alternates. With standing traffic queuing at each end of the squeeze points. So if it was to be 1 way, the traffic would move all of the time. Could even have a cycle Path. The right turn from the pond into Windmill just slows up the traffic. You could put in a mini roundabout joining Turners Hill & Windmill Lane & reduce the Turners hill roadway from the pond roundabout to one lane with No right turn into Windmill Lane. As far as lights then you would only need a pedestrian phase.</p>
Lisa Smith	<p>I am a resident of Turnford and I see that a new station is proposed in our town. I have looked at the maps on the website and it isn't clear where it is proposed to be. I would be most grateful if you could send me exact details of where it is proposed, and also how it will be accessed. This is so that I can make an informed response to the proposals locally.</p>

Submitted by	Comments - individuals
Dr David Storey	<p><u>Transport (Roads)</u></p> <p>There appears to be a lack of an integrated approach in the Transport Strategy as this does not link up with neighbouring boroughs, specifically Enfield (the A10 south bound bottleneck immediately to the south of the M25) and Welwyn & Hatfield (the Cuffley Hill / Goffs Lane bottleneck caused by Cuffley Village itself).</p> <p>A. A10 / M25 J25 roundabout system: A key component of the strategy to support the overall growth of the borough, which needs to be actioned first, is the desperate need to improve the traffic flow at the A10 / M25 J25 roundabout system. This has been identified in the Local Plan as the largest bottleneck in the whole borough (as shown in your Figure 4.3). But while this has been designated as item “HS.01” in the Transport Plan and has the support of the Highway’s Agency the proposed changes to the A10 / M25 J25 roundabout system seem to be limited to only</p> <ol style="list-style-type: none"> 1. Slip road from M25 east bound onto northbound carriageway of the A10 2. Slip road from the southbound carriageway of the A10 onto the east bound M25 <p>Hence the planned improvements seem to fall far short of what has been proposed in your Figure 6.7 “M25 J25 Capacity Improvement Scheme” – see attached pdf above.</p> <p>With the planned increase in housing and the new business centre at Park Plaza it is clear that the AECOM modelling of the increased A10 traffic needs to be updated to take into account the changes needed around the A10 / M25 J25 roundabout system. The AECOM Report entitled “A10 Corridor Potential Transport Interventions Design Investigation Report” specifically excludes this J25 bottleneck hotspot as highlighted in Figure 1 of this report and it only addresses areas to the north of this M25 intersection. There is no mention of any assumptions around changes in traffic flow at this M25 junction which is currently the rate limiting bottleneck to the southbound traffic on the A10 with stationary traffic queued every morning north of the Brookfield Centre all the way down to the J25 junction on the M25. The AECOM modelling seems to ignore the J25 area altogether.</p> <ul style="list-style-type: none"> • The report specifically mentions this flaw in the modelling by stating in Section 4 in italic font <i>“It should be noted that as part of future consideration of all, or any options, additional local and area wide strategic modelling will be required. It is recommended that this is based around a package of interventions within the borough to ensure that cumulative impact is considered and allow an integrated traffic management strategy to be developed”</i>. <p>A prime concern with the proposed HS.01 scheme (and eventual modelling of traffic flow around the J25 10 roundabout) is that it does not address the principle problem which is the A10 bottleneck immediately on and to the south of the M25. Two key areas which have <u>not</u> been addressed as part of the HS.01 modifications to the Junction 25 roundabout lie within the Enfield borough / M25 interchange. Without these two areas (highlighted below) being addressed I fail to</p>

Submitted by	Comments - individuals
	<p>see how the congestion on the A10 Southbound carriageway (which stretches all the way from north of the Brookfield Centre to the M25 junction and beyond) can be ameliorated since all the proposed changes to the A10 between Brookfield and Park Plaza will simply exacerbate the bottleneck on the roundabout above the M25.</p> <ol style="list-style-type: none"> 1. Area 1: Traffic southbound on the A10 turning right at the A10 / M25 J25 roundabout onto the M25 west bound carriage way blocks the A10 southbound exit of this roundabout and reduces the exit from 3 down to 2 lanes. This is because there is only one lane on the slip road to the M25 westbound carriageway, which forces traffic into the single outside lane of the carriageway on the roundabout leading to the traffic lights controlling the flow of traffic northbound on the A10 onto this roundabout. Figure 6.7: M25 J25 Capacity Improvement Scheme makes no mention of any solutions to this problem which appears to have been completely ignored. See attached pdf above of Figure 6.7: M25 J25 Capacity Improvement Scheme with annotations in red ink. Having experienced this specific bottleneck, even at the weekends, I fail to see why this is not being addressed by the Highway's Agency / being pushed by the BBC into another borough to resolve when the impact is in the Broxbourne Borough <u>today</u> let alone in 2033. 2. Area 2: This has been recognized as an issue in the Broxbourne Borough Council Transport Strategy in section 11.5.7 Enfield (i.e where the A10 and A1010 meet Bullsmoor Road), but this bottleneck in turn extends to the 2 lane stretch of the A10 on the Great Cambridge Road immediately south of Bullsmoor Lane, where three lanes merge into two. Yet there are no plans to ameliorate this bottleneck which also contributes to the backup of traffic on the southbound carriageway of the A10 in Beoxbourne. <p>B. Cuffley Hill/ Newgatestreet Road / Goffs Lane 3-way Junction The morning rush hour traffic, from about 07:00am onwards, travelling west down Cuffley Hill to Cuffley gets backed up all the way from Cuffley, up Cuffley Hill to the Goffs Oak mini roundabout and back further into both Newgatestreet Road and Goffs Lane. Hence the proposal to place a 3-way traffic light control instead of the mini roundabout in the centre of Goffs Oak village does not address the prime problem which is the bottleneck created in Cuffley village itself and highlights the Broxbourne Borough Council lack of understanding of local traffic issues. This problem will only be exacerbated IF the approximately 1000 new homes proposed to be completed in the vicinity of Rosedale / Goffs Oak / Cuffley Hill go ahead. If the traffic cannot flow away from this 3-way junction due to the bottleneck in Cuffley (Welwyn and Hatfield borough) adding a set of lights is not going to solve anything. There is no solution to Cuffley bottleneck (it is a busy village with many shops open at 7:30am with parking lay-bys on both sides of Station Road in Cuffley . Do not make the congestion in both Goffs Oak and Cuffley any worse than it already is. The only way forward is (1) NOT to build any new houses in the immediate vicinity of Goffs Oak and (2) to simply leave the existing mini roundabout and pedestrian crossing in front of Boots as is.</p>

Submitted by	Comments - individuals
	<p>In summary, when do the Broxbourne Borough intend to produce a fully integrated Transport Plan (as proposed in the preliminary AECOM modelling report), showing which road schemes will be completed when, as a function of time, relative to the planned increased housing and other building works to demonstrate that there will actually be a continued improvement in traffic flow ? i.e that it will not become progressively worse over the next 5 – 10 year horizon before there is any improvement over today's gridlocked areas.</p>
<p>Dr David Storey</p>	<p><u>Local Cycling and Walking Infrastructure Plan – proposed Cycle route down St James Road, Goffs Oak</u></p> <p>There is a lack of appreciation by the Broxbourne Borough Council of the volume and speed of traffic travelling west along St James Road during the morning rush hour (by vehicles trying to bypass the traffic build up going west on Goffs Lane towards Cuffley). There are no traffic speed signs on St James Road, which has been designated by the Broxbourne Borough Council as a “country road”, and traffic has very limited visibility due to the many blind curves along its length. In addition there are several areas where the road is too narrow for two cars to pass safely in opposite directions, not to mention the short length of road with a single file width restriction with one-way priority. GPS enabled “black boxes” fitted to cars to monitor driving reveal St James Road has speed limits of 30mph and 60mph on different sections. Having used St James Road virtually every day for the past 18 years I can safely say I have never seen anyone foolish enough to use this road for commuting by bicycle. If the Broxbourne Borough Council wishes to promote St James Road as part of the local cycling infrastructure then some very significant changes to traffic flow / speed / behaviour will be required. Avoiding increasing the level of housing in Goffs Oak village and the immediate surrounds (including Tudor Nurseries and Rosedale) will certainly be an important component of seeking to enable the safety of cyclists using this country road.</p>
<p>Costas Stylianides</p>	<p>After reading about your proposed plans for enlarging Lieutenants way, I am obliged to tell you that I would be strongly against these plans. I live in Grovedale Close which and have lived here for 10 years. When we first moved in, there was barely any traffic from this road and little noise. 10 years later we can hear cars day and night with little protection from our housing to the main road. These developments will increase the traffic 10 fold which will mean more noise and pollution. What will you do to safeguard our way of life?</p>
<p>Laurence Taylor</p>	<p>With regard to the proposals for schemes 3A and 3B where access to College Road from the A10 will be blocked can you please explain how traffic will navigate into Cheshunt (east) as you are effectively blocking access here and also at Church Road.</p> <p>In addition to that, if you are also proposing to develop Cheshunt Lakes off Windmill Lane there will be a massive increase in traffic that needs to get to/from the A10 and it's not clear from this document or the Transport Strategy how this is being planned.</p> <p>As part of this it seems you are proposing to reduce the width of Windmill Lane which is non-sensical if the area of Tesco old offices is being developed.</p>

Submitted by	Comments - individuals
	<p>Also, on page 54 of the Cycling & Walking Plan you state: -</p> <p>'Funding and detailed plans and permissions are already in place for the implementation of an all-weather surface along the New River from St. Catherine's Road. This connection will provide local access on foot and potentially access from the majority of Hoddesdon by bicycle. The Lee Valley Park offers good routes to the south. Station Road appears to have sufficient width that, subject to feasibility study, may have the potential for segregated cycle lanes.'</p> <p>Please clarify when this is supposed to happen as for years this path becomes a muddy, puddle ridden mess to walk along in the winter. It used to be maintained but has not been for a number of years and it is intensely annoying having to negotiate this path in the dark and wet in work shoes and clothes.</p>
Anonymous	<p>I am writing in response to your Transport Strategy consultation document.</p> <p>Whilst I agree that improvements need to be made to improve traffic flow into and around the area, I completely DISAGREE with you banning right hand turns INTO college road (B198) for the following reasons:</p> <ol style="list-style-type: none"> 1. You are simply diverting traffic and funnelling it elsewhere onto smaller residential roads such as the B198 towards Bury Green/Goffs oak. There is a school here and traffic is already poor around this area due to the number of traffic lights. Increasing traffic high will pose a higher risk to children 2. You will also funnel traffic down Winston Churchill Way towards Theobald's grove railway station. This area is already congested due to the high street, traffic lights and speed bumps. Adding traffic here will make the situation far worse. 3. By banning right hand turns, the same volume of traffic will be in a smaller are and therefore more congested. If you are adding more lanes, this will compensate for a right hand turn. 4. How will residents and shop owners who live and work on the right hand side access their properties / places of work? If we cannot turn right into college road or church lane, then how do you suggest we get home or get to work? <p>I travel in rush hour from my home in college road to and from St Albans on a daily basis. This is a 37 mile round trip and banning the right hand turn will add a significant delay to my journey home.</p> <p>Also, if you look at the traffic in real life, rather than through the use of computer modelling, you will quickly and rapidly see that the northbound congestion starts AFTER college road. Traffic is often stationary from College Road up to Church Lane. This is due to the traffic lights and the BP petrol station. In fact, if it wasn't for people turning right then the traffic would be more stationary. The right hand turn eases the flow of traffic; there is a slow but steady and consistent pace from the Winston Churchill</p>

Submitted by	Comments - individuals
	<p>Way roundabout all the way to college road. It is AFTER his point, there is a problem. I agree that banning right hand turns into CHURCH lane is fine as this is a small residential road.</p> <p>By funnelling traffic into residential areas you will introduce more stop/start traffic, increase carbon emissions and make it nosier. Surely the idea is to keep traffic on the main roads? The A10 southbound into London is far more congested than the Hertfordshire region yet they have retained their left and right hand turns with no problem (i.e. caterhatch lane, southbury road).</p> <p>Finally, what about the emergency vehicles? Banning right hand turns will cause obstructions as they too won't be able to access the roads as easily.</p>
Andrew Turiw	<p>I have recently received 'Broxbourne Life' and read through the transport proposals through to 2033.</p> <p>Many of these 'improvements' are merely sticking plasters over a long term and impossibly difficult situation which cannot be effectively tackled without looking at the one big issue that is the cause, namely over population. Without addressing the huge population growth in Greater London and the surrounding counties, we will never be able to solve the infrastructure challenges facing Hertfordshire. Building new roads, laying more train lines, building countless new homes will serve only to facilitate the unsustainable increase in the population.</p> <p>In my lifetime, and especially since the New Labour years, I have seen a considerable decrease in quality of life caused predominantly by unsustainable population growth.</p> <p>Cheshunt and Waltham Cross have gone from being quiet and pleasant towns to now being London overspill, with huge traffic jams, anti-social behaviour and crime increasingly blighting these areas. I fear that this situation will only get worse and our children and their children will pay the price due to politicians in Westminster and in local government burying their heads in the sand with regards to the huge challenges that have been created by past administrations. Reduce the population and these challenges will diminish.</p>
Scott Ward	<p>Re: Broxbourne Transport Strategy (Please find letter attached – and see below).</p> <p>It isn't often I am moved to make comment on council proposals however, as this has such a huge impact to Cheshunt as a whole, I would like to raise a few concerns regarding the proposed changes to the A10 corridor.</p> <ol style="list-style-type: none"> 1. Firstly, I am more than aggrieved that as a directly impacted resident, no prior consultation notice has been received at this residence to date and that my first insight as to the proposed strategy has been through the November 2017 issue of Broxbourne Life (provided by my son's school). Surely more impacted residents should have had better notification? 2. I'd like to bring into question the modelling data used and the fact that this is now 4 years out of date and not representative of the traffic or current peaks (which, actually begin prior to 8am and 5pm). I travel the route myself both North and Southbound and

Submitted by	Comments - individuals
	<p>would question whether these values were just lifted from Google Maps based on distance and speed calculations. I'm sure that should you physically travel the routes yourself during these windows this would be evidenced.</p> <ol style="list-style-type: none"> <li data-bbox="453 461 1382 734">3. The modelled routes are specific to 5 key routes and do not appear to consider Cheshunt High Street nor the B156 in considerable detail. Should the proposal of a no right turn be introduced the traffic flow will be increased from drivers attempting to exit left from the A10 at both College Rd and Church Lane resulting in a reduced flow for East and West traffic. Any exiting traffic will also attempt to turn at the first available point (or receive priority at roundabouts) to the detriment of drivers on East/West routes. <li data-bbox="453 797 1382 1039">4. East/West traffic under the proposed no right turn will be unable to access the A10 corridor directly and will be forced to join Cheshunt High Street or the B156 until they can access the A10 corridor with a left turn. Whilst I appreciate you will be aware of this impact I would like to point out 2 into 1 rarely works and again, flow will be dramatically reduced on any route other than the A10 corridor. How is this justified? <li data-bbox="453 1102 1382 1308">5. With the introduction of @1750 additional dwellings in the Cheshunt Lakeside/Delamare Roads vicinities there would be (by your own tables - 41% multiple car households) some addition of @2600 vehicles vying for access to Cheshunt High Street and the B156. Has this been effectively modelled and tested in your scenarios? <li data-bbox="453 1370 1382 1576">6. Air quality issues – The A10 corridor may be unimpacted with the reduced stand time however, I believe this will be transferred to the surrounding minor routes. This carries a greater risk due to the increased pedestrian activity, residential access and more importantly local schooling at these peak times. What mitigation has there been to justify this impact to children and adults? <li data-bbox="453 1639 1382 2016">7. Pedestrian crossings on the A10 – Whilst I appreciate the 2 crossings at College Rd and Church Lane allowing pedestrians to cross the A10 there are 2 further crossing points on the A10 between these roads. Are these to be removed with the proposed increase in lanes? The crossing solutions in figures 6.9 and 6.10 of your documentation do not appear to clearly detail the crossing points for traversing College Rd (near Goffs School) or Church Lane (near Hatton Rd), with the increased flow from the A10 safety needs to be met. Have the correct crossing times been modelled and evidenced as these routes are predominately used by school children? Do these crossing times give scope to a right turn?

Submitted by	Comments - individuals
	<p>8. Pedestrian safety to the East/West of the A10 corridor – 48% of children walk to and from schools in Broxbourne.</p> <p>In summary I believe the Broxbourne Transport Strategy is focussed solely on the A10 (North/South) corridor and the movement of vehicles upon it. The local transport links, health, safety and wellbeing of residents are secondary and, the 'Liveable Streets' (Ref: 4.4.9) scenario could not be realised. This in turn will drive additional severance between the East and West adjoining communities.</p> <p>I am not a qualified Planner but would question many of the proposals in this document (as should you – I assume someone who doesn't live or drive in the borough?!) as unjustified, ineffective, unevidenced, wholly unsound and undeliverable.</p>
Lynn Winter	<p>The Broxbourne Life magazine states that one of the main changes to the Local Plan is to increase the number of homes at Cheshunt Lakeside by 75%. Based on the cars per household figures contained in Table 2.1 of the transport strategy this will mean 2,415 extra cars in Delamare Road but I cannot find any mention in the strategy document of how these numbers will be accommodated. Admittedly, it is a long document so if it is there please advise what section I should refer to.</p>
Michael Zannetou	<p>I have reviewed Scheme 3B regarding the changes to College Road and I strongly object to the banning of right turns at this junction. This will cause a great inconvenience to the residents of Cheshunt and make it much more difficult to return from London and to drive to the Brookfield Retail park, especially as Scheme 3A also suggests banning of right turns at this junction. I believe this will cause massively increased congestion & increased pollution within Cheshunt & Waltham Cross itself as normal traffic will be diverted through much narrower town roads instead of the easy right-turn run-offs. Please reconsider your strategy.</p>

Representations from bodies, in alphabetical order

Body	Comments - bodies
Bayfordbury Estates	<p>We have undertaken a review of the Broxbourne draft Transport Strategy, dated September 2017. We consider that this document represents a comprehensive and robust strategy, successfully mitigating planned development for the borough, whilst ensuring that sustainable modes of transport are widely encouraged.</p> <p>There are areas where more detailed assessment of mitigation options needs to be undertaken as it is recognised that the studies carried out so far in support of the Strategy have by necessity examined those options as broad concepts. With transport schemes, more detailed studies often reveal further options.</p> <p>With this in mind, we would strongly request that a flexible approach to strategic transport planning for the borough is encouraged, responding directly to the nature and phasing of the development brought forward. We note there are a number of alternative / additional options available to</p>

Body	Comments - bodies
	the Council so as to ensure a comprehensive approach to infrastructure and transport planning over the plan period.
Brookfield Property Unit Trusts Ltd	<p><u>Methodology within the Transport Assessment</u></p> <p>20. The Regulation 19 draft Local Plan promotes the Broxbourne Transport Strategy, and sets out the proposed amendments to the road infrastructure. WSP's principal observations are that junctions in the vicinity of Brookfield Retail Park exceed capacity with the proposed mitigation and the draft Local Plan proposals, and at some junctions traffic conditions are worse than without the mitigation. Secondly, the data and models used are not sufficiently robust to reliably test the impacts of the Brookfield Riverside proposals. The highways amendments proposed by the Council are considered to be insufficient to accommodate the development growth proposed in the draft Local Plan without significant degradation in network conditions. The proposals do not provide viable infrastructure necessary to support sustainable development in line with the NPPF.</p> <p>21. WSP note that the Transport Strategy has relied upon the 2013 base year model prepared by JMP. The survey data collected by JMP Consultants Ltd to build the model is almost five years out of date. It is considered that more recent surveys should be conducted in order to ensure that a robust and realistic analysis is undertaken. WSP therefore have serious concerns about the reliance on this data given the changes in traffic flows over the period, as well as developments and highways alterations in and around Broxbourne that are likely to have affected traffic flows.</p> <p>22. Furthermore, WSP state in their report that it is not possible to tell from the data and reports provided by the Council whether the base year model is an accurate reflection of traffic flows near to the proposed Brookfield Riverside. It is considered that there are insufficient traffic counts in this area to quantify the extent to which the base model reflects the 2013 observed traffic flows, and therefore the reliability of the future year traffic conditions forecasts.</p>
Brookfield Property Unit Trusts Ltd	<p><u>Impact on the transport network</u></p> <p>23. Notwithstanding our concerns about the methodology, WSP has analysed the WYG highway modelling which supported the draft Transport Strategy. WSP has raised concerns about the inadequate transport modelling, and the lack of proposed significant public transport improvements given the assessments are based on drawing people in to Brookfield Riverside from across the whole borough.</p> <p>24. From reviewing the model against Department for Transport (DfT) guidance (WebTAG), it is evident that validation of the link flow falls just outside of the DfT AM peak criteria, whereas the PM peak is a long way from satisfying the criteria. In addition, it is noted that the model does not test weekend peak periods, which is considered to be unusual in the context of the retail-led development, where the highest trip rates are generally on Saturdays.</p> <p>25. WSP has analysed the forecast year models provided by JMP and is concerned that the traffic growth factored into the modelling had previously been over-estimated. In addition, WSP has concerns relating</p>

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	<p>to the lack of forecast traffic to and from Brookfield Retail Park via The Links. The 2013 base year model assumes a significant amount of “rat-running trips” occurring via Whitefields Road, with 15% of Brookfield Retail Park traffic using the route during the AM peak. In reality however, this should not be a competing route with the A10.</p> <p>26. WSP has also raised concerns relating to the performance of the junctions in the Brookfield Retail Park area. The percentage volume over capacity (% of total junction capacity used up) of each of the junctions is shown in WSP’s note which demonstrates that even with no mitigation, four major junctions used by Brookfield Retail Park traffic are already over-capacity. WSP also note that some of the junctions near Brookfield Retail Park perform worse in the 2033 With Mitigation model compared to the No Mitigation model.</p> <p>27. In light of the above, it is very clear that there are serious concerns regarding the robustness of the Council’s conclusions, and the ability for the proposed infrastructure to cope with the significant new floorspace proposed at Brookfield Riverside.</p> <p>28. For this reason, it is considered that the draft Transport Strategy is not sound.</p>
Brookfield Property Unit Trusts Ltd	<p><u>Sustainable Transport</u></p> <p>29. In addition to the key technical transport concerns set out above, it is important to assess the proposal’s sustainable credentials in light of the strategic objectives set out within national planning guidance.</p> <p>30. One of the key objectives of the NPPF is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. It is considered that the proposals do not prioritise the use of public transport, walking and cycling, and they are not balanced in favour of sustainable transport modes, in line with the requirements set out within the NPPF.</p> <p>31. The Inspector in his report dated 7 December 2011, when assessing the Council’s draft Core Strategy, considered that “the proposal would function primarily as a retail and leisure stand-alone development, with a limited walk-in catchment.1” The Inspector continued to state:</p> <p>“...Although the increased size of the retail centre would support potential improvements to public transport, the transport modelling shows that a large proportion of shoppers would travel by car. The location is not inherently sustainable, in contrast to the Borough’s town centres, where a robust strategy to encourage investment would accord much more closely with government policy objectives to promote sustainable development2” (emphasis our own).</p> <p>32. It is considered that Broxbourne Borough Council has not adequately addressed the above comments made by the Inspector in 2011 in the latest Regulation 19 draft of the Local Plan. The proposals remain focused on trips taken by the private car.</p>

Body	Comments - bodies
	<p>33. Paragraph 29 of the NPPF states that “the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.” Paragraph 30 states that “in preparing Local Plans, local planning authorities should support a pattern of development which, where reasonable to do, facilitates the use of sustainable modes of transport.” WSP have noted that Brookfield Riverside is a retail-led development, with no major public transportation nodes, and WSP consider that in its current guise, the proposal would remain a primarily car-borne destination. Whilst there may be a modal shift within the Borough, this shift is likely to be around trips associated with major public transport hubs such as bus terminals and train stations.</p> <p>34. The critical mass of new retail floorspace would draw significantly increased numbers to the local area, and it is strongly considered that the immediate area could not function successfully with the increased volume of traffic. The proposals are not located in a location where the need to travel will be minimised and the use of sustainable transport modes can be maximised, in line with the NPPF.</p> <p>35. In light of the above, it is considered that the draft Transport Strategy is not sound.</p> <p>1 Inspector’s Report to Broxbourne Borough Council dated 7 December 2011, page 16, paragraph 58 2 Inspector’s Report to Broxbourne Borough Council dated 7 December 2011, page 17, paragraph 59</p>
Canal and River Trust	<p>We note that there is no reference to the Lee Navigation within this document, but only potential improvements to the New River for walking and cycling. This does not recognise the potential for walking and cycling benefits of the Lee Navigation, which provides a connection along the length of the Lee Valley Regional Park, and down to the River Thames at Limehouse. The Trust is working with TfL and other relevant partners to improve the Lee Navigation towpath for walking and cycling, and would welcome S106 and CIL support from developers to deliver, and link in with local development and cycling and walking networks.</p>
Canal and River Trust	<p><u>Local Cycling and Walking Infrastructure Plan</u></p> <p>As above, for the Transport Strategy, we note that there is no reference to the Lee Navigation within this document, but only potential improvements to the New River for walking and cycling. This does not recognise the potential for walking and cycling benefits of the Lee Navigation, which provides a connection along the length of the Lee Valley Regional Park, and down to the River Thames at Limehouse. The Trust is working with TfL and other relevant partners to improve the Lee Navigation towpath, and would welcome S106 and CIL support from developers to deliver, and link in with local development and cycling and walking networks.</p>
East Herts Council	<p>Re: Draft Broxbourne Transport Strategy: Response on behalf of East Herts Council</p> <p>In respect of the consultation on the Draft Broxbourne Transport Strategy, East Herts Council submits the following as its response:</p>

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	<p>1. East Herts Council supports the commissioning of transport evidence to underpin its Local Plan development strategy, and is encouraged by proposals seeking to increase passenger transport uptake, walking and cycling schemes.</p> <p>2. However, the Council has particular concerns about both the methodology utilised in the report and its conclusions.</p> <p>3. Firstly, it is questioned why 2013 was selected for use as the base year, when Hertfordshire County Council's (HCC) 2014 Base Year data is readily available to provide a more recent benchmark that would better reflect existing traffic conditions.</p> <p>4. Secondly, a fundamental concern arises around the selection of routes for journey time comparisons. Of the five routes selected, four of these are east-west oriented, with only the A10 between the M25, J25 and A1170 (Dinant Link Road) Hoddesdon as a north-south measure. Given that the study proposes measures that would result in the diversion of large volumes of traffic through the A1170 in the Waltham Cross and Cheshunt areas, it is not transparent what the full impact on the route would be in journey time terms and it therefore seems particularly remiss that the route was not included as an alternative north-south artery for comparison purposes.</p> <p>5. In respect of the prevention of right turn movements at College Road and Church Lane, although it is detailed that various options were considered before these interventions were determined to be the most appropriate, the study does not detail what such other options, beyond grade separated junctions, were. In terms of the impact of the cessation of right turn movements, the draft Strategy contains insufficient information as to where the traffic that would currently turn right would be re-routed to. It is inevitable that this would result in a significant increase of traffic on side roads, which are not currently designed to accommodate such movements and which already experience congestion, especially at peak times. It is unclear whether the necessary additional capacity needed on these routes has been satisfactorily modelled or whether any tailing back to the A10 would be likely to occur as a result of an increase in movements at College Road, Church Lane, or Winston Churchill Way.</p> <p>6. It would also be helpful to understand if the retention of right turn movements at one of the two junctions at College Road and Church Lane has been considered and whether the impact of that potential measure on flows along the A10 corridor and wider local road network has been analysed.</p> <p>7. However, currently, the Study proposes the cessation of right turn movements at both College Road and Church Lane junctions. In respect of promoting modal shift, the A1170 corridor is key to enabling the delivery of bus provision as a sustainable alternative to the private motorised vehicle, and several initiatives are included under the PT schemes that would utilise this route. However, it is difficult to perceive how this would become an attractive option to users when significantly higher numbers of vehicles would inevitably lengthen journey times (including some routes which serve East Herts) and where existing</p>

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	<p>carriageway constraints would limit the potential to introduce bus priority measures. In this respect, while plans of road layouts are included in the Strategy, there is no indication about how or where such bus priority measures would be introduced. Also, there appear to be no modelling outputs available to demonstrate related improvements on the wider road network. It is also considered that the added congestion along this route would be likely to make it less attractive to cyclists if the potential to introduce off-road provision is limited.</p> <p>8. Furthermore, the additional trips would undoubtedly have a negative impact on air quality along the A1170 on this stretch, which encompasses areas where, due to the location of shops and services (including nearby Cheshunt Hospital, which serves East Herts residents), higher numbers of pedestrians are more likely to be impacted than by the current queuing arrangements on the A10 at the College Road and Church Lane junctions. Likewise, roads in the College Road/Churchgate/Church Lane area would also experience degradation in environmental quality, where residential properties lie in close proximity to the affected roads, due to significantly increased trip movements and emissions from the inevitable queuing traffic.</p> <p>9. Moreover, this approach would appear to be at odds with the statement of Key measures included at paragraph xxv. of the Executive Summary which states, under Highway Schemes:</p> <p>□ A10 Capacity Improvements: A series of junction capacity enhancements from the M25 in the south through to Hoddesdon in the north, designed to improve the flow of both north-south and east-west traffic movements, and reduce severance through the provision of new and improved pedestrian and cycling crossing facilities [emphasis added].</p> <p>10. Given the above, and the fact that the traffic on the A10 would need to be held to allow the increased pedestrian crossing movements across the route, it is suggested that further examination should be given into allowing right turn movements, in conjunction with such pedestrian phasing, for at least one of the junctions. This would reduce the additional journey lengths that would be necessitated by the current planned strategy (which would involve significant additional circulating traffic around Churchgate or High Street routes to make an east-west movement) not only for local traffic, but also for those trips of longer nature e.g. from A10 southbound towards Cuffley/Goffs Oak utilising the B156, or northbound trips wishing to access the Old Pond without needing to travel through Winston Churchill Way/A1170 via Waltham Cross.</p> <p>11. As a separate issue, paragraph xx of the Executive Summary details that the capacity improvements “will not draw in additional trips from other strategic north-south links such as the A1(M) and M11”. However, there is a concern that the non-ability to perform right turn movements at College Road and Church Lane junctions would result in significantly higher levels of traffic needing to utilise Winston Churchill Way to access Cheshunt (via the A1170 at Waltham Cross) when approaching from the south. Not only is East Herts Council unconvinced that this would not cause queuing back to the M25 (which would potentially lead to severe impact on the strategic</p>

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	<p>road network) due to additional traffic utilising already congested roads at peak time, but it is also concerned that such congestion may actually have the direct opposite of an attracting effect, whereby trips wishing to access Hertford (and beyond) from the M25 could divert to the A414, which is already heavily constrained.</p> <p>12. The Council is generally supportive of the suggested inclusion of additional rail stations at both Turnford and Park Plaza, provided that the introduction of these would not negatively affect the provision of West Anglia services to stations in East Herts, particularly in relation to frequency of service on the Hertford East branch line.</p> <p>Other Issues</p> <p>13. Beyond the matters discussed above, a series of more minor issues has also been identified, which should be addressed in the final document:</p> <p>a) As a general comment, some of the figures and tables are partly illegible/presented in too small a font e.g Figs 4.2; 6.7; 12.2; and Appendix B.</p> <p>b) p37 – Table 4.3 – typo – under Operator for Burford Street, this should either read ‘BBC’ or if it is ‘BBB’, as stated, this should be defined in the key;</p> <p>c) p60 – The reference to Crossrail 2 should be caveated as the full funding of this scheme has yet to be confirmed;</p> <p>d) Various references to ‘Crossrail’ are made throughout the document and these should be amended to read ‘Crossrail 2’ to avoid any ambiguity with the actual Crossrail scheme/Elizabeth Line; in particular: Figs 7.3; 7.4; and 7.9;</p> <p>e) p111 – Fig 7.7 – for consistency, this should also detail ‘Crossrail 2 & Four Tracking’;</p> <p>f) p136 – Paragraph 11.5.6 – typo – should read ‘in fact’.</p>
Enfield Council	<p>General: Enfield strongly supports the provision of sustainable modes of transport in reducing the reliance on car-based journeys. The borough is keen to play a prominent role in helping London and the Wider South East in achieving environmental objectives. As a response to this, we are committed to the Cycle Enfield programme, which is a comprehensive network of high quality cycle ways that will be key to delivering sustainable transport in outer London. This will decrease levels of road congestion, which in turn will reduce levels of pollution and improve air quality. This will have significant benefits for public health. We would value working with you on developing this as part of a strategic approach.</p> <p>M25 Enfield Council welcomes and values the importance of a cooperative/partnership approach, through the various established officer and member working groups, in the planning for strategic and local road</p>

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	<p>network infrastructure to deliver future sustainable growth in Enfield, Broxbourne and the wider Hertfordshire sub-region.</p> <p>The planned Highways England - Road Investment Strategy (RIS) 2 improvement project at M25 J25 will benefit in part network capacity enhancements within the timeframe of the Broxbourne Local Plan (para 6.6.7), reducing congestion and delays along north - south routes between Broxbourne and Enfield.</p> <p>As mentioned before, Enfield strongly supports the provision of sustainable modes of transport in order to reduce the reliance on car-based journeys. The Council notes the technical evidence relating to significant reliance on car-based journeys (para 11.6.6) and very low usage of cycling in Broxbourne (para 11.6.69) and therefore welcomes the approach for sustainable modes of travel. Reducing car based journeys will have a positive impact for network through Enfield as well as Broxbourne and reduce congestion at key junctions, including M25 J25.</p> <p><u>A10</u></p> <p>Enfield Council welcomes improvements to the A10's junction capacity in Broxbourne through a co-ordinated package of measures to improve north-south capacity. However, it is highlighted in the transport work that delays are expected to be experienced on the road network in 2031, with or without Broxbourne related growth, where the A10 and A1010 meet at Bullsmoor Lane. It states that new developments in Park Plaza and Waltham Cross will not be the cause of congestion. With the Park Plaza development in close proximity to an already busy M25 J25, the Council suggests that it is unlikely that additional traffic associated with new development in Broxbourne would have no impact on the transport network. Enfield would welcome further discussions on dealing with strategic and long-term network infrastructure improvements aligned with respective future growth strategies.</p> <p><u>Cycling</u></p> <p>The proposed cycle lane improvements to the A10 is welcomed and will relate well with Enfield's proposed cycle lane improvements for the Hertford Road A1010 corridor. It is suggested Broxbourne Council also considers, in partnership with relevant bodies including Transport for London (TfL) and Enfield Council, cycle network improvements on the A10 - north of the M25 J25, which will tie in well with existing A10 cycle routes south of the M25 in Enfield.</p> <p><u>Rail Infrastructure</u></p> <p>Enfield Council strongly supports the potential early four-tracking of the West Anglia Mainline and the arrival of Crossrail 2 services in Broxbourne from 2033 onwards and the opportunities that these present to Broxbourne. Our specific response is detailed in the Local Plan response. Enfield also notes the delivery of two new rail stations – Turnford and Park Plaza – which are planned to provide further accessibility to the borough from London in particular, whilst also providing higher capacity and attractive links for commuters into London. Whilst these are an opportunity to encourage modal shift from road to rail, thus relieving pressure M25 J25 and the A10 in Broxbourne and Enfield, this could have a detrimental impact on frequency and journey times on rail routes for residents. Nevertheless, the Council acknowledges that these new</p>

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	stations will provide Enfield residents with greater connectivity to the Brookfield and Park Plaza developments.
Goffs Oak Community Association	<p>1. Urban v Rural</p> <p>Both the Hertfordshire and Broxbourne Plans are totally open that they are almost solely focused for the future on Urban movements, problems and promoting costed solutions to overcome these urban problems. This is obvious as only in urban areas can you provide a variety of transport modes which will be financially viable. Future demand is measurable and anticipatable directly reflecting increases in dwellings and jobs. Major infrastructure projects like Crossrail 2 can be allowed for as well.</p> <p>Rural areas as a whole do not have transport issues in the same way that urban areas do, so why try to fix rural issues when they do not need it? Goffs Oak is an exception as we will explain. In rural Broxbourne the only investment proposed in any rural areas is a single set of; as yet, unfunded traffic lights and we have no problem with that miniscule scale of potential investment.</p> <p>The proposed lights are in Goffs Oak, which currently has identified traffic problems and where significant serious additional problems will occur if Draft Local Plan housing proposals are not changed and massively reduced in number. We have no criticism of this reasonable oversight of the Strategy as Urban matters must take priority.</p>
Goffs Oak Community Association	<p>2. North-South versus east west connectivity</p> <p>Urban Broxbourne areas are North-South orientated and are located to the East of the A10 and the Plans accommodate and recognise that fact. Roads, railways, bus services, cycle routes and their orientations are also North-South as a result and they adequately serve this urban area as a consequence.</p> <p>Rural Broxbourne areas are solely East-West orientated and are almost exclusively on the west side of the A10. (Brookfield Centre is unique and technically West of the A10). As a result of this there is no capability or capacity to improve any of the rural transport communications with the urban areas of Broxbourne (or any other adjacent Boroughs for that matter either). Only impractical and unjustified costs could possibly overcome this problem of connectivity in practice. Transport demand is comparatively limited due to very low density housing, virtually no large scale employers existing, or any that would ever consider locating in these rural areas, with little or at best substandard and inadequate communications. Equally there is little economic argument for large scale developments in the future to justify infrastructure investment when compared to the immediate demands of the Borough's urban areas as the Strategy recognises and with which we wholeheartedly agree.</p>
Goffs Oak Community Association	<p>3. Roads in Goffs Oak are due to be gridlocked in the future</p> <p>Figure 11.1 is most illuminating and is provided by an independent source looking at Goffs Oak in a county wide context. From that research it identified that there are two problematic roads that leave Goffs Oak to the West in the Peak AM, being firstly Goffs Lane, leading into Cuffley Hill and secondly Darnicle Hill. The independent Hertfordshire Research</p>

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	<p>document that looked at Hertfordshire wide development proposals and the roads that would be overcapacity as a result stated that both these roads would become overcapacity. Their measure of overcapacity was quite simple as it was the volume (demand) of traffic against the capacity of the roads (supply) to meet those demands. Their conclusion that volume could not cope with capacity on these roads means that in practice the roads in question could not provide any reasonable means of leaving the village in the AM Peak or returning to the village in the evening peak.</p> <p>This matter is exceptionally serious, vital to existing residents and proof that there is insufficient road infrastructure to cope with nearly another 1000 houses in our village. Boringly we repeat that this is independent research. In addition, and it gets worse, the research stated that the route from Goffs Oak to get to Enfield and other parts of North London via Cuffley also has an identical problem. East Lodge Lane, the road linking Cattlegate Lane to the Enfield Ridgeway has to be added to the shortlist of overcapacity roads as well even if you have managed to get through Cuffley. So that will no longer be a viable route to access North London from Goffs Oak. Going East at Peak AM, there are no surplus parking facilities at Cheshunt Station, or any spare cycle storage and no bus services within 750 metres of the station. So that isn't an option. The proposed new bus service on Delamere Road is great for the urban areas of Broxbourne as it reinforces North South movements but is of no assistance to Goffs Oak residents as it will connect Waltham Cross with Hertford Regional College.</p> <p>So if you cannot leave to the West or East according to independent research what about going South into London? Sadly no prospect there either! Access due South is along Lieutenant Ellis Way. Currently queues are about half a mile long and can take a very long time. Then having got to the A10 you join the queues going south down the A10 towards London. Let's say 10 minutes of crawling traffic on a good day. Then hit Junction 25 of the M25 Highways England went through a short public consultation earlier this year and chose their Option 2 to work up into a detailed scheme. They define it as a Major Scheme and with a budget of £25 to £50 Million. The scheme will need planning and statutory approvals and is planned for completion by 2023. They state their "aim" is to start the project in March 2020 and complete it by 2023. There are an awful lot of ifs in this project proposal even ignoring three years of road works and added congestion during that period.</p> <p>How the junction will cope without major investment with a 12-14% natural increase in traffic, even ignoring the Goffs Oak proposed developments, is anybody's guess but it simply will not cope in our view and increasing the traffic flows from Goffs Oak will hardly help. As the residents will not be able to go West they will have to go South as there is no other option.</p>
Goffs Oak Community Association	<p>4. Plans depend on massive central government investment</p> <p>The plan claims funds have already been allocated to improve Junction 25 of the M25 but in the next decade. That is a sum of £27m out of a total budget of £130m but that sum has now been estimated as being as much as £50 million for the latest proposed scheme. In addition the plan relies</p>

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	<p>upon the junctions of the A10 with Park Plaza, Lieutenant Ellis Way and Winston Churchill Way being implemented and massively improved at a cost of £9 million. That amounts to £36m for the two changes or more than a quarter of all transport spending in the plan. Development proposed in Goffs Oak will have to rely on these projects proceeding if Local Plan housing proposals are to be viable in traffic terms alone as there will be no other way of getting out of our village at Peak AM times. What if neither happens? Politically it is quite likely neither will happen. Even less likely, if Labour gets in to power, or if we have a hard Brexit. Road budgets will be cut for many reasons but almost inevitably road budgets get lost almost immediately historically under budgetary pressures. They certainly disappear well before the NHS, education and defence budgets are touched. The needs of a wealthy Conservative Borough in the South East won't produce much sympathy politically; let's face it, let alone £60 Million.</p> <p>The suggested strategy admits that additional finance of £88.8 m is required, with only £44m secured to date, to meet schemes listed in the £130 m wish list. Potentially removing two schemes costing potentially nearly £60 m from the wish list will obviously make the strategy more achievable. Accountants from the Treasury will no doubt point this out in due course. Any strategy that assumes these two major improvements to the A10 and Junction 25 are certain to happen must be deeply flawed with respect. The Strategy document must state what will happen in the event neither or only one of these major improvements happen during the plan period. Importantly the strategy must explain what will happen if they do not get constructed.</p>
Goffs Oak Community Association	<p>5. The Nature of current journeys in Broxbourne as a whole</p> <p>The plan states that 70% of all journeys in Broxbourne as a whole are made by car overall. This % is much higher in rural areas than urban areas for the obvious reason there is no public transport to speak of. Only 5% of journeys are made by either bus or train (again much lower in rural areas like Goffs Oak). 82% of homes in Broxbourne have at least one car or van and 85% of over 17 year olds hold a full driving license. There is absolutely no reason to believe that the 1000 houses proposed in the Goffs Oak Green Belt will be different materially to these averages. That is a hell of a lot of extra traffic on already congested roads.</p>
Goffs Oak Community Association	<p>6. Additional housing in the wrong place leads to traffic overcapacity</p> <p>Without any additional housing development in Goffs Oak at all, the Plan states that traffic is forecast to grow by 12 to 14%. Whilst we find the Tudor Nursery traffic report somewhat debateable but it seems to suggest local traffic will also increase by 12-14% at peak times. Their Report claims and assumes Burton Lane has a capacity for one traffic movement every 2 seconds, or 1700 movements per hour. It claims that the traffic generation from the development of 360 houses on that site alone will be negligible. Then they say the scheme needs traffic improvements on the A10 which they do not want to pay for. The additional traffic cannot possibly be negligible-the definition of that word: insignificant and not worth considering. We strongly disagree and significantly disruptive might</p>

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	<p>be closer to a fair definition and this strategy document does not assuage our fears and concerns in any way on these massive proposed additional developments. We also do not accept Burton Lane can possibly accommodate 2 vehicle movements per second on average over one hour when maximum peak traffic movements are currently less than 90. It is just not credible.</p> <p>We have not seen a traffic report on Rosedale North (possibly another 10% increase in peak time traffic) or, indeed, a combined traffic report for the two schemes as one, or indeed any study of the 125 houses in the North of Goffs Lane and South of Goffs Lane scheme proposals (another 5% increase possibly), we think the indication was that the traffic generated by the new schemes will be at least another 12 to 14% at peak times on top of the 12-14% natural increases to the anticipated traffic growth without the developments.</p> <p>Our road infrastructure simply cannot possibly cope with that scale of increase and there is no practical solution to overcome the issue of the additional traffic offered by the Strategy document. We do not think that there is any solution and are therefore hardly surprised by that conclusion.</p>
Goffs Oak Community Association	<p>7. Current and Proposed Road journeys</p> <p>In the rural area of Broxbourne it is interesting to note that there is currently only one identified location of congestion. Coming in at 4th equal on the chart for the whole Borough, is Goffs Oak, also being the only location highlighted to the West of the A10. The reason for Goffs Oak congestion is massively simple and that is the large scale developments in our village from Borough Plans in recent years and the increased demand to use an East-West road route by the general public and commercial traffic with no additional infrastructure. The major issue in the morning is getting down Cuffley Hill or returning up Cuffley Hill in the evening. A set of proposed traffic lights will be absolutely like a chocolate fire guard, useless. The plan states that there is "little demand for buses in Broxbourne" but it also states that 70% of people living in the Borough do not actually work in the Borough and hence need to leave and return, in all likelihood, at peak times. Rural areas are no doubt an even higher percentage because cars and vans are their only option of travelling. Only 5% of all journeys to work were by bus and that includes urban journeys. At 2 cars on average per household in any new Goffs Oak housing development this will generate at least 1400 new traffic movements at peak times on a conservative basis. As the independent report states the roads in Goffs Oak cannot cope with this scale of increase. Neither can other essential local infrastructure cope in our view.</p>
Goffs Oak Community Association	<p>8. Public transport is not an option for proposed Goffs Oak expansion</p> <p>Modifying one existing infrequent and substandard bus route is proposed as the means of coping with the massive proposed additional housing development in Goffs Oak when only 5% of journeys use this means of transport in any event. 1% of journeys are by bike, so plans for cycle paths are not going to have any impact either. We strongly disagree that</p>

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	<p>this is a solution but note the observation.</p> <p>The plan recognises that there is no scope in rural areas to add bus lanes for the roads are too narrow. So any new bus service will be stuck in the same jams as all cars and vans and that is hardly a solution as a means of alternative public transport. It also accepts that the proposed bus route does not even connect to any other meaningful bus routes. Sorry but public transport is simply not an option to serve the scale of new housing proposed.</p>
Goffs Oak Community Association	<p>9. Mixed developments are not an option in rural areas.</p> <p>The plan states that Mixed Development could be one key to reducing the increase in traffic generated from new schemes where people can work where they live. It has to be accepted unequivocally that mixed schemes in Goffs Oak are a complete non starter as any means of trying to cope with the massive increase in traffic generation.</p>
Goffs Oak Community Association	<p>10. Mitigation is not an option in Goffs Oak</p> <p>Appendix C reasonably states that mitigation is another way of limiting traffic increases caused by new development. It concludes that new development should be located on sustainable transport corridors and that further capacity should be created by “connectivity improvements”. We totally agree but would point out there are no transport corridors in Goffs Oak, let alone sustainable ones, and that there are absolutely no opportunities for connectivity improvements to reduce the increase in traffic generated by additional development because of its East-West limitations.</p>
Goffs Oak Community Association	<p>11. Infrastructure Crisis if Goffs Oak schemes happen</p> <p>Proposed developments of the scale envisaged in the draft Local Plan for Goffs Oak are unsustainable in terms of infrastructure and this plan and Herts Plan and Herts Research come up with no solutions to the fact there is no road capacity to cater for this scale of proposed new housing and that public transport offers no alternative solution. It is noted that all the Goffs Oak developments are anticipated to happen in the first 10 years of the plan. Looking at the largest developments in our village in particular the latest Lichfield “Illustrative Masterplan” for Tudor Nursery, (not stated as being for identification purpose only please note) put on the Broxbourne portal on 27 September 2017, shows the proposed new access traffic points for Rosedale Park as it is known. There is no connection by road from Rosedale North to Tudor Nursery and the only physical link is one solitary footpath. Therefore all Rosedale North traffic must be using the small Goffs Oak lanes for access and egress, essentially having to use Burton Lane, and all Tudor Nursery traffic must be using Burton Lane or Goffs Lane by definition. Other proposed developments on Goffs Lane and Cuffley Hill would purely be adding traffic to a road which is defined as becoming overcapacity. No modified bus route or even a set of traffic lights will resolve this manufactured crisis created by the draft Local Plan new housing proposals.</p>
Goffs Oak Community Association	<p>12. Implications of additional mass housing development in Goffs Oak</p>

Body	Comments - bodies
	<p>The details contained within the Strategy document, together with the other plans and research documents it refers to, proves unequivocally that to site up to 1000 new dwellings in the rural area of Broxbourne, to the East of the A10 in Goffs Oak village is nonsensical and fallacious particularly as the area is already recognised to have congestion problems under the current 2005 plan. It is obvious that, in addition to a lack of educational and healthcare facilities, the whole road infrastructure would be gridlocked all too soon if further mass housing is constructed, as planned for implementation and construction at the earliest possible opportunity in the Local Plan.</p> <p>We are also most concerned with Hertfordshire County Council's formal objection to the Tudor Nursery proposal on the grounds of the risk of flooding. Flooding has never been a problem that we are aware of in Goffs Oak historically. We would like to keep it that way please.</p>
Goffs Oak Community Association	<p>13. All traffic solutions are urban – none are rural</p> <p>It is acknowledged that whatever steps are taken road traffic will dramatically increase in the Borough, with the planned increased housing and employment development. Mixed development, mitigation in urban areas and improved public transport are solely urban solutions that are available as explained in the strategy. None of those are solutions for Goffs Oak, as it is a rural area, with an East West orientation, and hence building even more houses in the area is illogical. Other than an acceptance for all residents in our village that roads will grind to a halt, no buses will solve the problem and there is no immediate access to train travel, how can large scale housing development in the Goffs Oak Green Belt make any sense? The answer is it doesn't, we believe as it is just not the right place for the large scale development proposed.</p>
Goffs Oak Community Association	<p>14. Conclusion</p> <p>We cannot think of a more inappropriate location in Broxbourne to propose around 1000 more houses than the village of Goffs Oak and its environs that has already seen major housing development under the current local plan. This Transport Strategy, the draft Hertfordshire LTP, the Hertfordshire independent traffic Research document, the Hertfordshire CC Flooding objections of 3 October 2017, the objections from local residents, the CPRE objections and our evidence that local educational and health infrastructure just cannot cope with the increase in people, let alone the major traffic issues add up to a consensus in our view. All the transport information provided in the three documents, we are commenting on, prove in our view that no mass new development should be contemplated or included in the Local Plan in Goffs Oak or our immediate environs.</p>
Hertfordshire County Council Environment Department	<p>It is not clear what status the TS will have and at this stage it would be entirely possible for the TS to be re-written in a way materially affecting the agreed approach. The core principles of the TS need to be enshrined in Policy INF2 i.e. hierarchical approach to mitigation, identified programme/packages of multimodal interventions need to be delivered in their totality and as packages rather than individual schemes. This in turn</p>

Body	Comments - bodies
	will provide some context to the later policies on Roads, Buses, Walking & Cycling etc
Public Health Department Hertfordshire County Council	<p><u>Section 3</u></p> <p>Public Health supports and agrees the vision and purpose of the Transport Strategy. There is some scope however to articulate more explicitly the role of transport in health improvement in section 3 of the Strategy, in particular points 3.2.4 and 3.2.5; in doing so this will link back to the new health and wellbeing objective as set out in the Local Plan. This could be supported further in the outlined Issues (obesity and physical inactivity), Opportunities (to improve physical health and mental wellbeing) and Policy Context (Broxbourne's Health and Wellbeing Strategy).</p> <p>With regards the detail and commentary for scheme specifics, we defer to County Highways colleagues. However, with respect to implementation of the Transport Strategy and LCWIP, we draw your attention to The Healthy Streets Approach. Developed through London-based research into the health impacts of transport, public realm and urban planning, Healthy Streets is a means to encourage designers to think about the multiple ways that streets influence health (noise, air pollution, social interaction, walking/cycling, public transport, safety) and to systematically design streets to promote health. See https://healthystreets.com/home/healthy-streets-in-policy/ for its application in policy and https://healthystreetscom.files.wordpress.com/2017/11/guide-to-the-healthy-streets-indicators.pdf for further information.</p>
Highways England	<p><u>Broxbourne Transport Strategy</u></p> <p>A key issue for Highways England in September 2016 was the lack of transport related evidence, therefore the submission of this Transport Strategy is welcomed. The Transport Strategy includes the junction improvements at M25 Junction 25. Currently Highways England is working closely with Broxbourne Borough Council to develop the preferred option and ensuring it complements other highway improvements in the area. A public exhibition will take place in early 2018.</p> <p>We will continue our discussions with Broxbourne on the Transport Strategy.</p> <p><u>Local Walking and Cycling Infrastructure Plan</u></p> <p>Highways England support the promotion of active and sustainable travel and we have no comments to make on this document at this time.</p> <p>After looking through the documents you have provided, we have no further comments to make at this time and are content with the information included within the reports. As you have mentioned, we will continue working with you on your Local Plan and evidence base.</p>
Historic England	<p>We support the provision of a Transport Strategy and Walking and Cycling Infrastructure Plan which seek to improve transport issues within the Borough and encourage alternative means of transport. The Transport Strategy is a high level document which outlines the broad intentions and areas of focus within the Borough in order to deal with</p>

Body	Comments - bodies
	<p>increased demands upon the existing transport network. It paints a useful picture of the current transport situation using a review of current data and trends whilst outlining possible future directions. The Transport Strategy and Walking and Cycling Infrastructure Plan link to the Local Plan objective of protecting and enhancing the historic environment which is welcomed but make no specific reference to the historic environment in the discussion of potential options. All options being considered must be progressed with the need to conserve or enhance the historic environment in mind.</p> <p>There are a number of major transport infrastructure projects and options discussed within the consultation documents. These are large projects, the details of which cannot be adequately considered here. We support a cross boundary strategic level consideration of transport infrastructure and look forward to being involved in specific proposals as they progress. We do not have a preference for any transport growth option at present until further information and analysis has been carried out with regards to potential heritage impacts. We are keen to ensure that growth and development conserves and enhances the significance of Borough's heritage assets. All proposed infrastructure schemes and route options should take into consideration their impacts on heritage assets and their setting alongside archaeological potential.</p> <p>New roads, cycle paths and associated infrastructure, including signage and hard standings for example, will result in impacts on landscape and townscape as such Historic England would want to be reassured that matters of siting, location and design will conserve the historic environment of the area. Therefore, it is important to ensure that transport appraisals properly assess all potential impacts on the historic environment to an appropriate level of detail. We have not considered archaeological issues in this response but would refer you to the HER held by the County Council who should be able to advise in this regard. Consideration should be given to the impact of the proposals upon the setting of both the designated and non-designated assets together with the potential for unknown archaeology.</p> <p>We would recommend that Historic England is listed as a stakeholder in table 10.1 of the Transport Strategy. Close engagement with Historic England and the Conservation team within the County and Borough Councils will be required in order to ensure the historic environment is appropriately considered in the development process.</p> <p>We would recommend that an assessment of impacts upon townscape, historic landscape and historic assets is included in any future assessment of route and infrastructure options.</p> <p>We would refer you to our website and pages concerning Transport and the Historic Environment https://historicengland.org.uk/advice/planning/infrastructure/planning-and-transport/. These pages set out the principles that Historic England will follow when discussing national transport policy and major transport development.</p> <p>We would also draw your attention to Streets for All – East of England https://historicengland.org.uk/images-books/publications/streets-for-all-east-of-england/. The manual offers guidance on the way our streets are managed. Specifically of includes advice on traffic management, signage, lighting, ground surfaces and verges etc. This document is in the process of being updated but the concepts are still relevant.</p>

Body	Comments - bodies
	<p>We hope that the above comments are of assistance. Please let me know if you have any queries. We look forward to further engagement on this scheme.</p> <p>Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we</p>
Greater London Authority	<p>We welcome Broxbourne's support for the implementation of Crossrail 2/four tracking of the West Anglia railway. The intention to work with Transport for London (TfL) and the rail authorities is also welcomed. Broxbourne is adjacent to our 'Crossrail 2 North' Opportunity Areas.</p> <p>We would also be grateful, if the council would consider extending some of the mayor's strategic transport policy objectives set out in the draft Mayo's Transport Strategy to the borough – including the promotion of Healthy Streets, rebalancing the transport system towards walking, cycling and public transport, improving air quality and reducing road danger. These objectives could be reflected in both the council's local plan and Transport Strategy.</p> <p>Finally, we continue to work with the Council on the London-Stanstead-Cambridge consortium promoting the benefits of development and investment across the corridor, which aligns with the draft London Plan's 'West Anglia Mainline Crossrail 2 North' Strategic Infrastructure Priority (see Policy SD3 and Fig. 2.15)</p>
Kings Arms and Cheshunt Angling Society	<p>A) Removal of Right turns on A10 - As we meet up at the Wolsey Hall Car park prior to on our frequent fishing trips, setting off to whatever venue we are going to, this would have an impact on some when arriving from South and all if going subsequently North. If going North we would have to travel up to Turnford prior to accessing A10, circumnavigating the Pond Roundabout, for members coming from South, they would have to traverse the two 20mph zones at Waltham Cross and Cheshunt Pond plus various junctions en route. Admittedly these journeys will take place off-peak on Sunday mornings, so traffic s/be at a low volume, but diversions due to reduced access to A10, can only increase amount of vehicle and noise pollution in a residential area engendered as a result.</p>
Kings Arms and Cheshunt Angling Society	<p>B) Combined Cycle and Walking routes - From my own and other members experiences with cyclists whilst fishing or out walking, there seems to be a small group of totally inconsiderate cyclists who will treat these as solely for their use and will race about giving no heed to other users and pose a serious safety risk to the public, so we are very strongly against this concept as it stands, unless speed reduction barriers are erected at regular intervals so they can't go too fast for safety. NB Having been involved with the Canal & Rivers Trust two tings policy regarding advance warning to pedestrians of a cycle approaching, I have found that 1) It is rarely complied with and 2) Even though a legal requirement, the miscreants that cause the problem don't even have bells fitted!</p>
Kings Arms and Cheshunt Angling Society	<p>C) Cycle/Pedestrian routes along New River - Because of issue in B above, we don't think this is a good idea, unless routes are kept away from the waters edge, they pose a significant risk to users safety if there was a collision between a cyclist and other users as the New River is a fast flowing and deep watercourse, any child or elderly person going into</p>

Body	Comments - bodies
	<p>the water albeit conscious is at serious risk of drowning, should anyone go in unconscious unless help is at hand immediately a fatality will result. Also will these routes be lit as during the hours of darkness unless the river is fenced off (not a visually appealing concept), the risk of collisions increases plus users may just stray into the river with possibly same sad results as mentioned earlier (NB lighting up the river would also generate an increased level of light pollution).</p>
<p>Kings Arms and Cheshunt Angling Society</p>	<p>D) Cycle/walking route adjacent to Cheshunt North Reservoir - This is a major issue to us, as we lease the fishing rights to this water from its owners the Environment Agency and is considered our premier venue and would object very strongly to any proposal which might impact our members enjoyment. We would wish the following matters to be taken into consideration:-</p> <ol style="list-style-type: none"> 1) Egress from New River to new route to be placed so that cyclists/walkers do not use path around lake used by anglers in this area, as it is not suitable for any other use e.g. narrow, sloping and uneven surface. 2) The route of cycle/walking track is to be of sufficient distance away from reservoir so that cyclists/walkers do not use path around lake used by anglers at any point, as this would cause negative interactions between them and anglers due to possible damage to expensive fishing rods etc. when angling path is occasionally blocked by this. 3) Avoidance of restrictions to our disabled access to purpose made disabled platform adjacent to former boathouse site, we are concerned that the current gate would be changed and vehicular access blocked as a result. As the Environment Agency also requires this for emergency access to their property it would not be a good idea to change this unless alternate vehicular access is provided for both parties. 4) If current vehicular access to disabled platform is now to be shared as part of proposed route, then warning signs would need to be placed at either end to warn of possibility of oncoming vehicles being met. 5) We have a current issue with cyclists using approach ramp to disabled platform as a BMX obstacle, if route or fencing could be emplaced so as to render this impossible, we would be grateful. 6) Our landlords are currently enclosing their land with a fence, new route should not cross this as it when completed would result in a lot of our worries about issues above becoming immaterial. <p>I have not yet explored proposed plans fully, this is but an interim response, additional comments may result from this further exploration, which will be submitted in a separate email.</p>
<p>Transport for London</p>	<p><u>Station access</u></p> <p>TfL welcomes the strategy's identification of the need for investment in order to improve access to stations along the proposed Crossrail 2 route. The development of multi-modal interchanges at Broxbourne, Cheshunt and Waltham Cross set out in this strategy is also welcomed. TfL's Crossrail 2 development team will continue to work closely with the borough as these plans progress to ensure Crossrail 2 is properly</p>

Body	Comments - bodies
	integrated into the wider transport network, taking into account the improvements in access and connectivity the scheme would generate and the local opportunities this creates.
Transport for London	<p><u>Bus travel</u></p> <p>In respect of bus travel TfL supports the strategy's intention to ensure that new strategic developments are connected into bus services and the introduction of a new "town service" to connect the railway stations at Waltham Cross and Cheshunt. Bus services should provide convenient interchange with Cheshunt Station. The focus on reducing reliance on car travel, through local accessibility improvements, is also welcomed.</p>
Transport for London	<p><u>New stations</u></p> <p>TfL notes the proposals for new rail stations at Park Plaza and Turnford. TfL London Rail, London Overground and the TfL Crossrail 2 team will need to be consulted and involved in feasibility work if either of these proposals are taken forward.</p> <p>It is noted that the proposed new station at Park Plaza is in close proximity to an adjacent London Overground station at Theobalds Grove. Any proposals at this location would be of keen interest to London Overground to understand the potential operational issues of this proposal in more detail. At both locations, Network Rail and TfL would need to be presented with a strong and clearly justified case for a new station. Sources of funding would also need to be identified if the proposals were to be taken forward. However, the funding of a new station at Turnford is not in the scope of the Crossrail 2 project.</p>
Transport for London	<p><u>12.4.3</u></p> <p>The text in 12.4.3 should be made clearer that Broxbourne is the proposed terminus and Crossrail 2 would serve Broxbourne, Cheshunt and Waltham Cross with a potential additional station at Turnford depending on business case and feasibility work.</p>
Transport for London	<p><u>8.2.7</u></p> <p>Reference to a potential station at Turnford (8.2.7) should make clear this is an aspiration and the business case (including funding sources) and feasibility still needs to be assessed.</p>
Transport for London	<p><u>Waltham Cross bus station</u></p> <p>Although not specifically mentioned in the Transport Strategy the potential expansion of Waltham Cross bus station (mentioned in INF6 of the Local Plan) is of particular interest. TfL manages and maintains Waltham Cross bus station and will need to be closely involved in proposals for its expansion. In any expanded bus station at Waltham Cross, provision should be made for additional standing space to cater for potential frequency or service increases on cross boundary bus services that are operated on behalf of London Buses. As manager of the facility, TfL London Buses would need to agree to proposed designs for the new or enlarged bus station at Waltham Cross. In the long-term TfL understands</p>

Body	Comments - bodies
	that there may be potential for a more comprehensive mixed use redevelopment in this area. TfL Property will need to be closely involved in its capacity as a landowner for a large part of the bus station site.
Transport for London	<p><u>Appendices</u></p> <p>Appendix A, PT0.1 should reference Crossrail 2 alongside four-tracking, as the current proposals see four-tracking delivered as part of Crossrail 2. The costs set out in Appendix B, PT0.1, might reference the approximate four-tracking costs of £3-4bn. TfL recommends that the funding sources acknowledge that sources which elicit contributions from areas outside of London, such as Broxbourne, are being explored.</p> <p>Appendix D Table 3 would benefit from splitting out Crossrail 2 and non-Crossrail 2 services.</p>

Hertfordshire County Council - Transport Authority Representations

Combined comments on the Pre-Submission Local Plan and the Transport Strategy

Transport

General

Identifying transport infrastructure to support the Local Plan (LP) based upon a series of core principles (growth supported by a transport network in which as many journeys are made by bus, rail, walking and cycling) to maximise the sustainability and viability of the identified schemes is supported.

Existing evidence, however, indicates how challenging this could be:

- there are significant transport constraints to be overcome if the goals of the LP are to be realised. High levels of car ownership, significant levels of out commuting, particularly to London, add to the congestion on the transport network.
- travel demand within the Borough is generated by its strategic position just to the north of London and the M25. This creates often conflicting demands on the network in locations where north-south, typically strategic trips, are opposed by more localised east-west movements.
- congestion hot spots on the network that result, can lead to delays, creating a severance between adjoining communities, on the A10 for example.

The LP and its supporting Transport Strategy (TS) need to strike the correct balance between providing highway improvements which create additional capacity and improvements which facilitate a shift to more sustainable transport modes. Whilst both the LP and TS appear to be trying to secure this balance it is not currently clear what policy status the TS will have. The aspirations of the TS in the LP policies would benefit from strengthening to ensure that the vision enshrined within it is reflected in the LP.

Evidence presented in the TS in particular demonstrates an understanding of current and future travel patterns, with the transport modelling indicating that the package of interventions (Public Transport Schemes, Walking & Cycling Schemes, Smarter Choices and Highway Schemes) suggested would provide the correct balance of transport infrastructure to support the growth set out in the LP.

The omission of an up-to-date Infrastructure Delivery Plan (IDP) also means that there is currently no clarity on whether the full package of mitigations identified in the TS will be translated into the IDP. The County Council would expect that all the measures identified in the TS will be included in the IDP.

In addition to the above, the County Council has the following comments and questions concerning policies and statements within the LP and its supporting documents.

Policy INF2: Broxbourne Transport Strategy

It is not clear what status the TS will have and at this stage it would be entirely possible for the TS to be re-written in a way materially affecting the agreed approach. The core principles of the TS need to be enshrined in Policy INF2 i.e. hierarchical approach to mitigation, identified programme/packages of multimodal interventions need to be delivered in their totality and as packages rather than individual schemes. This in turn will provide some context to the later policies on Roads, Buses, Walking & Cycling etc.

Policy TM1: Sustainable Transport

Pedestrian movements

The aspirations that developments do not adversely affect existing footways and should always look to extend and enhance the provisions of new pathways, rights of way and equestrian routes is supported.

Provision for an evidenced based approach demonstrating how pedestrian movements are prioritised is key. All new paths should be constructed in accordance with HCC Roads in Hertfordshire: A Design Guide.

The proposals for improvements along the New River path and further access enhancement to all open spaces, including Lee Valley Regional Park are supported.

Although detailed in the TS, a clearer reference to user hierarchy or general principle of reducing travel first in the LP would be appropriate.

Policy INF7: Bus Transport

The strategic policies relating to passenger transport (INF7 Bus Transport and TM1 Sustainable Transport) do not adequately cover the following points:

1. Developer contributions are essential to pump prime the operation of new or enhanced bus services.
2. Developer contributions should not only support the new bus services, but also bus stop and real time infrastructure improvements.
3. Subject to detailed discussion, consideration of bus priority measures should be developed and included in the IDP.

It is unnecessary to refer to a specific bus route number (242) in Policy INF7 (Bus Transport), as this may reduce future flexibility.

With regard to individual site allocation policies, passenger transport schemes (services and infrastructure) appear to be missing, and have been collated separately in Policy INF7.

Brookfield

5.15 indicates a requirement for public transport accessibility, but this is not mentioned in Policy BR1 (Brookfield). Developer contributions for new or enhanced bus services, appropriate stopping and interchange facilities, and possible bus prioritisation will be required.

Broxbourne Station

6.3 indicates supporting infrastructure for Crossrail 2 will be required, but it or Policy BX2 (Broxbourne Station and Environs) makes no reference to station access by non-car modes. The LP should include a high quality interchange facility, enhanced public transport services where required and priority access for non-car modes.

Cheshunt Lakeside (Delamare Road)

The 7.4 access improvements, including the requirement for bus stops and service enhancement along Delamare Road, is not been mentioned in Policy CH1 (Cheshunt Lakeside).

Rosedale Park

Paragraph 7.9 highlights the valley is largely inaccessible, but Policy CH2 does not indicate the need to secure developer contributions for enhanced public transport accessibility.

Waltham Cross

There is potential for bus station expansion which has not been considered in the strategic policy only, and should be acknowledged.

Policy INF8: Local cycling and Walking Infrastructure Plan

An over reliance on 20mph zones, including those proposed for A and B roads, is not consistent with the County Council's Speed Management Strategy. 20mph zones have a role for quieter residential areas and back streets and potentially also town/local centres in combination with urban realm improvements.

Some concerns about proposals for walking and cycling in the town centres – the current narrative supports more open access by vehicular traffic and facilitating parking, which could be at odds with the objectives of the Walking & Cycling Strategy and general direction of Local Transport Plan 4.

There are a number of 'off road' routes through parks, open space and river banks, which certainly have a role in the cycling network, especially for leisure and day time journeys. However, a network of good cycle and walking provision on streets and key road links so they are useable and attractive to a wider range of people, all year round, would be appropriate.

The policy and LP would benefit further by incorporating the techniques/approaches as set out by DfT guidance on Local Cycling and Walking Infrastructure Plans (LCWIPs).

The aspiration within the LP to seek a range of funding opportunities to deliver the measures proposed is supported. Working in partnership to bring developer led schemes forward which support walking and cycling should be a key consideration within the IDP.

The LP states that a strategic approach to walking and cycling will only be put in place within the first 5 years of the plan period. A strategic approach to walking and cycling is a vital part of a sustainable transport strategy and needs to be set out as part of the LP process to ensure suitable improvements and opportunities to improve or add infrastructure are identified and secured through the IDP in a planned and complimentary way.

Policy TM2: Transport and New Developments

All Transport Assessments and/or Transport Statements should demonstrate evidence that they have been written in a way that reflects the local traffic impacts of developments rather than being to 'general' in nature or focus. They should also, when appropriate, reflect traffic impacts when a number of developments are being consider at once or within the same locality.

Robust monitoring regimes need to be introduced in terms of Travel Plans which accompany planning applications. Therefore, effective monitoring and enforcement of policy must be undertaken, evidence of which should include a timetable for annual monitoring of travel patterns for new developments as well as support from developments to meet the financial costs of monitoring Travel Plans. Reference should be made to 'evaluation and support contributions' for Travel Plans being sought.

Policy TM4: Electronic Vehicle Charging Points

The County Council's Highways Cabinet Panel of the 5 September 2017 agreed the following in relation to a Strategy for Ultra Low Emission Vehicle Charging Points:

- i. In future, the Council would not provide or manage new Ultra Low Emission Vehicles charge points, but would enable the District and Borough Councils to promote and manage on-street charge points through the extension of the existing Parking Agency Agreements where such on-street provision accords with the law and powers available to both councils.
- ii. The existing Ultra Low Emission Vehicles charge points and responsibility for their management be transferred to the relevant Borough and District Councils.

Policy TM4 should be drafted in a manner that reflects this.

Policy EQ02: Air Quality

Requirements for developers to submit information concerning the effect on air quality is supported. The County Council would want to review mitigation measures which would involve impacts on the highway network.

Further strengthening of the policy applying it to all developments Borough wide, not just those within an existing AQMA, would be supported.

Strategic sites

Park Plaza Site: For the Park Plaza section within the LP (section 10) there is no specific mention of:

- i) The importance of the need to upgrade the A10/M25 junction (it is mentioned in passing in section 10.6, but it should be included within Policy PP1).
- ii) The need to improve traffic flows through the signalised A10 junctions with Church Lane and College Road. These requirements are mentioned elsewhere in the LP (section 17), but for the avoidance of doubt it should be included in the Park Plaza section.

Cheshunt Lakeside (Delamare Road): There is no acknowledgment that there is currently not a bus service along Delamare Road, and this should ideally be sought for the proposed development.

Theobald's Brook Field: There is no mention of the importance of looking at bus services routing or the provision of new/upgraded bus stops.

Smaller sites

As for some of the smaller site allocations (e.g. between 25 and 100 dwellings), the wording around them is less detailed when compared to the strategic sites. This is perhaps understandable, but reference should be made in the introductions to each section which includes these smaller developments directing the reader to the general 'sustainability' sections throughout the LP (in particular section 30 – 'Transport & Movement'). Also, there is no really obvious recognition that the cumulative impact of a number of smaller developments can be just as great as one larger development, so the need for highway capacity considerations (even if not necessarily full traffic assessments/models) may be justified in those cases.

Bus stop improvements

There is no real mention in the LP of the type of upgrades to bus stops that are of benefit (raised kerbing, shelters, RTI, etc). These measures are mentioned in the TS but they should also be included in the main LP in relation to the smaller developments (sought through s106 contributions or conditions).

Technical Guidance

A minor point, but Section 30.8 makes reference to Manual for Streets 2. Manual for Streets (2007) is still relevant guidance too (i.e. MfS2 does not supersede MfS).

Parking

The parking levels set out in the LP for each planning use class are reasonable, but it is not clear what reduction can be applied to maximum levels based on the designated PTAL areas across the Borough (i.e. there is no PTAL/Accessibility map included). Government has encouraged a shift away from this approach in recent years to a more pragmatic approach based on local environmental conditions. However, the County Council would support the inclusion of parking levels as shown in Appendix B of the LP as a starting guideline point.

Agency agreement

Under section 30.4 there is the following wording: "Broxbourne Borough Council has entered into an Agency Agreement with Hertfordshire County Council (HCC) to act on its behalf in Highway Authority matters, including the management of development construction".

This should be reworded as follows:

'Broxbourne Borough Council has entered into an Agency Agreement with Hertfordshire County Council (HCC) to act on its behalf in some Highway Authority matters, ~~including the management of development construction~~'.

General Comments

The timeframes for the delivery of interventions required to facilitate growth (short term (by 2021 - 0-5yrs), medium term (by end of Plan 5-10yrs) and Long term (beyond 2031) are key. Evidence should be clearly identified within the Plan to demonstrate how the first 5yrs of the plan is deliverable, which is critical to the success or failure of the LP and supporting TS.

Highways England Representations

Broxbourne Transport Strategy

A key issue for Highways England in September 2016 was the lack of transport related evidence, therefore the submission of this Transport Strategy is welcomed. The Transport Strategy includes the junction improvements at M25 Junction 25. Currently Highways England is working closely with Broxbourne Borough Council to develop the preferred option and ensuring it complements other highway improvements in the area. A public exhibition will take place in early 2018.

We will continue our discussions with Broxbourne on the Transport Strategy.

Local Walking and Cycling Infrastructure Plan

Highways England support the promotion of active and sustainable travel and we have no comments to make on this document at this time.

After looking through the documents you have provided, we have no further comments to make at this time and are content with the information included within the reports. As you have mentioned, we will continue working with you on your Local Plan and evidence base.