

**Appeal by Aldi Stores Ltd
Proposed Discount Foodstore and Non-Food Retail Unit, Homebase,
Sturlas Way, Waltham Cross, EN8 7BF**

**Rebuttal of the Proof of Evidence of Marie Laidler
by
Tim Britton, Connect Consultants Limited
on Behalf of Aldi Stores Ltd**

**LPA Reference: 07/21/0519/F
PINS Reference: APP/W1905/W/22/3292367
Date: 8th July 2022**

Appeal by Aldi Stores Ltd
Proposed Discount Foodstore and Non-Food Retail Unit, Homebase,
Sturlas Way, Waltham Cross, EN8 7BF

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1.0 INTRODUCTION

1.1 Personal Details

- 1.1.1 This is the Rebuttal Proof of Evidence of Tim Britton. My personal details are presented in my Proof of Evidence submitted on 21st June 2022.
- 1.1.2 In preparing my Rebuttal Proof of Evidence, I have adhered to the professional standards expected by the professional body to which I belong, and those expected of a professional Transport Planner.
- 1.1.3 I visited the Appeal Site on Thursday 30th June 2022 between the hours of 10:00 and 14:00.

1.2 Overview

- 1.2.1 My Proof of Evidence (PoE) was based on two of the five reasons for refusal, being the two which related to transport matters:

Reason for Refusal 3 (RR3)

"The proposed development would not provide sufficient connectivity improvements for cyclists and pedestrians and improvements to promote the use of public transport. The proposal is therefore contrary to policies TM1, TM2 and TM3 of the Broxbourne Local Plan 2018 - 2033 and the NPPF"

Reason for Refusal 4 (RR4)

"The proposal does not adequately address the shortfall in car parking spaces at the site and is therefore contrary to policy TM5 of the Broxbourne Local Plan 2018 – 2033"

- 1.2.2 This Rebuttal Proof of Evidence is based on the Proof of Evidence (PoE) of Marie Laidler, Senior Planning Officer at Broxbourne Borough Council (the Council), dated June 2022.
- 1.2.3 It is stated at paragraph 1.4 of Ms Laidler's PoE that the Council is no longer defending its RR3.
- 1.2.4 In this Rebuttal Proof of Evidence, I note that while the Council is no longer defending RR3, it is maintaining its defence of RR4 which relates to the shortfall in parking provision compared to the local guidelines.
- 1.2.5 In the Council's Statement of Case, RR4 is predicated on the alleged lack of connectivity by non-car modes; the very issue which is acknowledged as having been resolved by the fact that the Council is no longer defending RR3. On this basis, RR4 is undermined and undefendable.
- 1.2.6 Finally, I provide additional information from recent surveys of car parking and pedestrian movements, which further demonstrates that the proposed parking provision is sufficient, including the slightly reduced provision in proposed site layout Revision K (detailed in the following section), and that there is indisputably existing connectivity between the Site and other areas of the town centre.

1.3 Hertfordshire County Council Highways Statement of Common Ground

- 1.3.1 Hertfordshire County Council (HCC) is the local highway authority.
- 1.3.2 I have signed a Statement of Common Ground (SoCG) with Mr Matthew Armstrong, Area Manager (North & East) of HCC Highways Development Management.
- 1.3.3 The SoCG is appended to this Rebuttal Proof.
- 1.3.4 Through our ongoing discussions, and with the aim of resolving HCC's comments, an alternative site layout plan has been produced as Revision K (The Harris Partnership Drawing '2924-COR-111K'), which is also appended to this Rebuttal Proof.
- 1.3.5 Site Layout Plan Revision K includes the following minor modifications:
- 6no. cycle hoops for Homebase (increase from 3no.)
 - Vehicular access width further reduced (existing width of pedestrian route across the access is 16.3m, Revision D and Revision F propose 14.0m, Revision K proposes 10.7m).
 - Existing pedestrian access retained in the centre of the Sturlas Way frontage (as per Revision D) in addition to the proposed new pedestrian access at the northern end of the Sturlas Way frontage (as per Revisions D and F), and enhanced legibility of the pedestrian routes within the site.
- 1.3.6 Site Layout Plan Revision K is acceptable to both HCC and to the Appellant, who is willing to accept a planning condition based on Revision K.

1.4 Truth Statement

- 1.4.1 I have prepared this rebuttal proof of evidence for the Appeal, in a manner consistent with my professional code of conduct. To the best of my knowledge, its contents and the professional opinions that I have expressed are true irrespective of by whom I am instructed.



Tim Britton

2.0 REBUTTAL

2.1 Refusal Reason 3

- 2.1.1 The Council is no longer defending Refusal Reason 3, as stated in the PoE of Marie Laidler at paragraph 1.4.

2.2 Refusal Reason 4

- 2.2.1 The Council maintains its defence of Refusal Reason 4 (RR4), which is worded as follows:

"The proposal does not adequately address the shortfall in car parking spaces at the site and is therefore contrary to policy TM5 of the Broxbourne Local Plan 2018 – 2033"

- 2.2.2 The 'shortfall' relates to a perceived shortfall compared to the car parking guidelines in Appendix B of the Broxbourne Local Plan (2018-2033).

- 2.2.3 It is worth reiterating here paragraphs 3.3.5 and 3.3.6 of my PoE:

- 2.2.4 The Broxbourne Local Plan parking ratios are described as "Guidelines", rather than "Standards", and no mention is made of maxima or minima which are sometimes present in Parking Standards documents elsewhere. The fact that they are referenced within policy TM1 does not mean that they are to be treated as anything other than guidelines to inform the development management process.

- 2.2.5 The implication of "Guidelines" is that they are provided as a starting point, and that variations are permissible. This should be particularly relevant if the variations are supported by evidence.

- 2.2.6 In its Statement of Case, the Council expands on RR4 at paragraph 5.25:

"...the issue of insufficient pedestrian accessibility improvements to and within the site places significant doubt over the acceptability of this shortfall. Without the pedestrian links there is potential for increased vehicular travel to the site resulting in greater demand for parking."

- 2.2.7 At paragraph 5.26 of its Statement of Case, the Council states:

*"...the proposal does not sufficiently address the shortfall in car parking at the site **due to** the inability to encourage alternative modes of transport through enhancing connectivity to the wider town centre. This shortfall also has potential to result in overspill of parking onto adjacent roads."* (My emphasis)

- 2.2.8 In my PoE, at paragraphs 5.3.1 through 5.3.10 I provide data from recent surveys of pedestrian movements in and out of the existing Homebase site which clearly demonstrates that the site location and the existing internal and external connectivity appears to be attractive to pedestrian use.

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- 2.2.9 The Council is no longer defending its RR3, which demonstrates that the Council is satisfied that the proposal does have the ability to encourage alternative modes of transport through enhancing connectivity to the wider town centre.
- 2.2.10 Therefore, the evidence demonstrates that proposed site layout Revision D and Revision F are accessible and connected to the rest of the town centre.
- 2.2.11 Further, it is agreed at paragraph 3.1 of the SoCG with HCC that location of the site will be accessible by walking, cycling and bus travel on the basis that the southbound bus stop outside 250 and 252 High Street (north of the site), will be improved with raised kerbing, the existing public footway at the north-eastern corner of the site will be widened to 3 metres, and the remainder of the existing public footway along the site frontage onto Sturlas Way will be widened to 2 metres, as shown on site layout plan Revision K.
- 2.2.12 The Appellant is willing to accept a planning condition based on Site Layout Plan Revision K.
- 2.2.13 Given that RR4 is predicated on an alleged lack of non-car accessibility and connectivity, an allegation which has now been resolved, the ability to defend RR4 must also fall away.

2.3 Additional Survey Information

- 2.3.1 Irrespective of the above conclusion that RR4 can no longer be defended on its premise of poor non-car connectivity, I have commissioned some additional surveys to record both the occupancy levels of the existing Homebase car park and the number of pedestrian movements in and out of the Homebase site.
- 2.3.2 The surveys were undertaken between 07:00 and 19:00 on Wednesday 29th June 2022, Thursday 30th June 2022, and Saturday 2nd July 2022.
- 2.3.3 The car park survey recorded the number of vehicular arrivals and departures every 15 minutes, and the number of vehicles in the car park at the start of each day's survey. The accumulation of parked cars in the car park can be calculated from this information for each 15-minute period.
- 2.3.4 The pedestrian surveys recorded the number of pedestrians walking in and out the site using any point of access along the site's Sturlas Way frontage (via the vehicular access, the pedestrian access, or by crossing the wall).
- 2.3.5 The surveys also recorded the direction in which the pedestrians walked to/from the site (either to/from the north, to/from the south, or to/from the east via the Wickes car park on the opposite side of Sturlas Way).
- 2.3.6 The relevance of recording the pedestrian movements via the Wickes car park is that there is a through-route to the northern end of the pedestrianised High Street and its shops and services. During my site visit I observed numerous pedestrians using Wickes' car park as a cut-through between the High Street and Homebase.
- 2.3.7 Sturlas Way south of Homebase also provides a pedestrian route to the pedestrianised High Street.

- 2.3.8 The route north of Homebase leads to the signal-controlled crossings around the Winston Churchill Way roundabout, beyond which are the bus stops, shops, and train station.
- 2.3.9 This June/July 2022 survey data provides a third reference point alongside the two surveys to which I refer in my PoE. It adds validity to the May 2022 data which shows lower car parking occupancy than the data from 2021, and therefore adds credibility to the findings of the Transport Assessment and my PoE.
- 2.3.10 In the remainder of this section, I set out summary results of the three sets of survey data, looking first at car parking accumulation and occupancy, and second at pedestrian movements.

Car Park Arrivals, Departures, and Peak Parking Occupancy

- 2.3.11 Table 1 shows for each of the surveys the total number of vehicle arrivals and departures (comprising cars and light goods vehicles, excluding heavy goods vehicles) in/out of the Homebase access on Sturlas Way. It also shows the maximum number of vehicles (peak occupancy) parked in the car park on each of the survey days.

Table 1 – Homebase Car Park Arrivals, Departures, and Peak Occupancy

	Wednesday 14 th July 2021	Saturday 17 th July 2021	Thursday 19 th May 2022	Saturday 21 st May 2022	Wednesday 29 th June 2022	Thursday 30 th June 2022	Saturday 2 nd July 2022
Arrivals	747	1024	678	999	638	606	842
Departures	747	1001	668	995	639	604	843
Car Park peak Occupancy	78	76	58	70	57	65	70

- 2.3.12 The data in Table 1 shows that although the amount of traffic in and out of the car park varies across the different survey dates, the peak occupancy of the car park has remained relatively consistent.
- 2.3.13 While the peak occupancy recorded in the 2022 surveys is marginally less than was recorded in the 2021 surveys, the analysis of the car parking in Section 6 of my PoE focusses on the peak occupancy recorded in the 2021 surveys (78 on Wednesday 14th July 2021, and 76 on Saturday 17th July 2021).
- 2.3.14 I now consider the parking accumulation and capacity of the proposed car park in light of the latest survey data and the slightly reduced parking capacity of site layout Revision K, following the methods used my PoE.

Observed 2021 Homebase Peak Parking + Local Plan Guideline for Aldi

- 2.3.15 As set out in my PoE (paragraph 6.3.4), based on the peak occupancy of 78 observed in the 2021 surveys, the proposed car park of 155 spaces will have spare capacity for at least 77 vehicles, which is 21 fewer than the 98 car parking spaces indicated by the Local Plan Guidelines.

- 2.3.16 Under Site Layout Plan Revision K, the proposed car park of 151 spaces will have spare capacity for 71 vehicles, which is 25 fewer than the guideline 98 spaces.

Reduced Homebase Peak Parking + Local Plan Guideline for Aldi

- 2.3.17 It is possible that the proposed reduction in floor area of the Homebase store will result in a subsequent reduction in customers, trips, vehicle trips and car parking demand.
- 2.3.18 As set out in my PoE (Section 6.5), based on a pro-rata reduction of the observed 2021 peak occupancy (reduced to 56 vehicles), the proposed car park of 155 spaces will have spare capacity for the 98 car parking spaces indicated by the Local Plan Guidelines.
- 2.3.19 Under Site Layout Plan Revision K, the proposed car park of 151 spaces will have spare capacity for 95 vehicles, which is 3 fewer than the guideline 98 spaces.
- 2.3.20 If I instead use the 2022 surveys' observed peak occupancy of 70 instead of the 2021 surveys' peak of 78:
- 2.3.21 Highest peak surveyed parking = 70
- 2.3.22 Non-Homebase parking: $70 \times 15\% = 10.5$
- 2.3.23 Homebase parking: $70 \times 85\% = 59.5$
- 2.3.24 Reduced GFA Homebase parking demand: $59.5 \times 65.93\% = 39.2$
- 2.3.25 Recombine with non-Homebase parking: $39.2 + 10.5 = 49.7$.
- 2.3.26 On this basis, the future parking demand of the reduced-size Homebase store (excluding the proposed Aldi) has been calculated as a peak of 49.7 vehicles (50 vehicles in real terms).
- 2.3.27 The proposed Revision K car park of 151 spaces will have spare capacity for 101 vehicles, which is 3 more than the guideline 98 spaces.

Observed Homebase Peak Parking + Aldi Peak Parking Using TRICS Data

- 2.3.28 As set out in 'APP-TN03 – Car Parking Data' appended to my PoE, the observed peak Homebase parking of 78 on a weekday and 76 on a Saturday have been added to the peak parking accumulation calculated from the agreed TRICS data used for the assessment of Aldi traffic.
- 2.3.29 This is perhaps an unrealistically robust calculation as it adds the peak accumulation of Homebase and Aldi even though the two peaks may not occur concurrently.
- 2.3.30 Nonetheless, adding the Homebase peak to the Aldi peak results in a peak total car park occupancy of 122 on a weekday and 123 on a Saturday, well within the proposed 155 spaces and the 151 spaces proposed in Revision K.
- 2.3.31 Obviously, if the 2022 observed Homebase parking demand is used (lower than observed in 2021), and if the proposed smaller Homebase store results in lower parking demand than observed in the surveys, there will be even more spare parking capacity within the proposed car park.

Observed Homebase Parking Accumulation Profile + Aldi TRICS Parking Accumulation Profile

- 2.3.32 Again, as set out in 'APP-TN03 – Car Parking Data' appended to my PoE, a more-realistic calculation has been undertaken by summing the parking accumulation across the day for each of Homebase and Aldi, to calculate the combined total parking accumulation allowing for the differing times of peak parking associated with each unit.
- 2.3.33 The peaks of the combined parking accumulations are 101 and 115 vehicles for the weekday and Saturday data respectively; well within the proposed 155 spaces and the 151 spaces proposed in Revision K.
- 2.3.34 Again, if the 2022 observed Homebase parking demand is used (lower than observed in 2021), and if the proposed smaller Homebase store results in lower parking demand than observed in the surveys, there will be even more spare parking capacity within the proposed car park.

Summary

- 2.3.35 The proposed car park does not accommodate the maximum observed Homebase parking plus the 98 car parking spaces indicated by the Local Plan Guidelines.
- 2.3.36 However:
- 2.3.37 It is possible that the proposed reduction in floor area of the Homebase store will result in a subsequent reduction in car parking demand. A pro-rata reduction would mean that the proposed 155-space car park would accommodate the guideline 98 spaces for Aldi; the 151 spaces of Revision K would be 3 short of the guideline 98.
- 2.3.38 Adding the observed peak Homebase parking to the agreed TRICS-based peak Aldi parking results in a total well within the proposed parking provision.
- 2.3.39 Adding the daily parking accumulation profiles of Homebase and Aldi results in a combined accumulation well within the proposed parking provision.
- 2.3.40 More recent surveys indicate that the peak Homebase parking has reduced since the 2021 surveys on which the calculations are based; if this trend continues, there will be more spare capacity within the car park.
- 2.3.41 While the proposal does not accommodate the guideline parking provision for Aldi, all of the above demonstrates that the proposed car park will accommodate the demand and will not result in "overspill of parking onto adjacent roads" as stated in the Council's Statement of Case paragraph 5.26.
- 2.3.42 It is worth reiterating that Local Plan Policy TM 5 states that the "Council will seek a sensible balance of car and cycle parking spaces based on the nature of the proposal, site context and wider surrounding area, and accessibility of shops, services and sustainable transport infrastructure, with the overall aim of reducing private car use."
- 2.3.43 The data and analysis presented herein demonstrates that a sensible balance has been proposed.

Pedestrian Movements

- 2.3.44 RR4 is predicated on the premise that the site has insufficient pedestrian accessibility and connectivity to the wider town centre.
- 2.3.45 I have commissioned surveys of pedestrian movements in/out of the Homebase site along its Sturlas Way frontage which irrefutably demonstrate that there are substantial numbers of existing pedestrian movements via Sturlas Way and the Wickes car park.
- 2.3.46 Table 2 shows the total numbers of pedestrian movements in/out (arrivals + departures) of the Homebase site, recorded in May, June and July 2022. The May 2022 surveys recorded only in/out movements at the pedestrian access, which explains some of the variance, whereas the June and July 2022 surveys also recorded the direction of travel outside the site.

Table 2 – Pedestrian Movements To/From Homebase Site

Direction To/From	Thursday 19 th May 2022	Saturday 21 st May 2022	Wednesday 29 th June 2022	Thursday 30 th June 2022	Saturday 2 nd July 2022
North			7	7	1
East			344	278	411
South			258	181	305
Total	245	417	609	466	717

- 2.3.47 The pedestrian survey data shows that there are already a significant number of pedestrian movements in and out of the Homebase site, with the vast majority of those movements being via the Wickes car park and via Sturlas Way south of the site, both of which provide a route to the pedestrianised High Street and the wider town centre.
- 2.3.48 With this level of existing pedestrian movement in and out of the site, there is clearly existing accessibility and connectivity to the rest of the town centre, and it provides evidence which clearly demonstrates that the premise on which RR4 is based is incorrect.
- 2.3.49 Further, the Appellant is willing to accept conditions relating to improvements to the non-car accessibility, as set out in the Highways SoCG.

3.0 REBUTTAL PROOF OF EVIDENCE SUMMARY

3.1 Summary of Rebuttal

- 3.1.1 This Rebuttal Proof of Evidence is based on the Proof of Evidence (PoE) of Marie Laidler, Senior Planning Officer at Broxbourne Borough Council (the Council), dated June 2022.
- 3.1.2 The Council is no longer defending its Refusal Reason 3.
- 3.1.3 Given that Refusal Reason 4 is predicated on an alleged lack of non-car accessibility and connectivity, an allegation which has now been resolved, the ability to defend Refusal Reason 4 must also fall away.
- 3.1.4 Irrespective of this, I have commissioned some additional surveys to record both the occupancy levels of the existing Homebase car park and the number of pedestrian movements in and out of the Homebase site.
- 3.1.5 While the proposal does not accommodate the guideline parking provision for Aldi, my analysis using datasets from three separate surveys and multiple methods of analysis demonstrates that the proposed car park will accommodate the demand and will not result in “overspill of parking onto adjacent roads” as stated in the Council’s Statement of Case.
- 3.1.6 The existing level of pedestrian movement in and out of the site demonstrates that there is clearly existing accessibility and connectivity to the rest of the town centre, and provides evidence which clearly demonstrates that the premise on which RR4 is based is incorrect.
- 3.1.7 The Highways Statement of Common Ground agrees that the alternative proposed site layout plan Revision K is acceptable to both parties, and the Appellant is willing to accept a condition relating to Revision K.

3.2 Conclusions

- 3.2.1 The Council’s removal of Refusal Reason 3 has consequently undermined the premise on which Refusal Reason 4 is based.
- 3.2.2 Refusal Reason 4 is unsound and undefendable.
- 3.2.3 During discussions held with the aim of resolving HCC’s comments, an alternative proposed site layout plan Revision K has been agreed with HCC.

APPENDICES

Appendix CCL RPOE/01: Highways Statement of Common Ground

ALDI STORES LIMITED

LPA REF: 07/21/0519/F

PINS REF: APP/W1905/W/22/3292367

PROPOSED DISCOUNT FOODSTORE AND NON-FOOD RETAIL UNIT

HOMEBASE, STURLAS WAY, WALTHAM CROSS, EN8 7BF

HIGHWAYS STATEMENT OF COMMON GROUND

5TH JULY 2022

1.0 Introduction

1.1 This Statement of Common Ground has been prepared collaboratively between Tim Britton of Connect Consultants ('Connect') on behalf of Aldi Stores Limited ('Aldi') and Matthew Armstrong of Hertfordshire County Council ('HCC'), and relates to an appeal regarding Broxbourne Borough Council's refusal of planning application reference 07/21/0519/F at Homebase, Sturlas Way, Waltham Cross, EN8 7BF. The description of development of the detailed planning application is as follows:

"Refurbishment, extension and external alterations to existing non-food retail unit to enable it to trade as part foodstore and part non-food retail unit, alongside modifications to existing external garden centre, car parking layout, landscaping and other associated site works".

1.2 This Statement addresses the following areas of common ground between the appellants and HCC:

- Proposed Site Layout Plan Alternative Solution;
- Pedestrian and Cycle Access;
- Effect of the proposed development traffic on the surrounding road network;
- Effect of the proposed development traffic on road safety;
- Provision of cycle parking;
- Provision of car parking;
- Delivery and servicing arrangements;
- Travel Plan;
- Matters of disagreement.

2.0 Collaboration

2.1 Since the start of the Appeal process, Connect and HCC have collaborated, seeking to overcome the objections of the Hertfordshire County Council as Local Highway Authority.

2.2 The planning application was based on the proposed site layout plan Revision D (The Harris Partnership Drawing '2924-COR-111D').

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- 2.3 The appeal Inspector has since accepted Revision F (The Harris Partnership Drawing '2924-COR-111F') as a substitute proposed site layout plan
- 2.4 Through ongoing discussions between HCC and Connect, an alternative site layout plan has been produced as Revision K (The Harris Partnership Drawing '2924-COR-111K'), appended to this Statement, which includes the following modifications:
- 6no. cycle hoops for Homebase (increase from 3no.)
 - Vehicular access width further reduced (existing width of pedestrian route across the access is 16.3m, Revision D and Revision F propose 14.0m, Revision K proposes 10.7m).
 - Existing pedestrian access retained in the centre of the Sturlas Way frontage (as per Revision D) in addition to the proposed new pedestrian access at the northern end of the Sturlas Way frontage (as per Revisions D and F), and enhanced legibility of the pedestrian routes within the site.
- 2.5 The reduced width of the vehicular access results in the need for a different manoeuvre by delivery vehicles before exiting the site, a manoeuvre which is accommodated by the removal of four parking spaces (Revision F provides 155 spaces; Revision K provides 151 spaces).
- 2.6 The delivery vehicle route through the site also involves a reverse manoeuvre within the car park in order to turn before exiting the site in a forward gear, via the car park aisle closest to the building (shown in Connect drawing 19094-SK220701.1).
- 2.7 The manoeuvres of the delivery vehicle will be overseen by a pedestrian marshal via the Delivery and Servicing Management Plan, as set out below.

3.0 Non-Car Accessibility of the Site's Location

- 3.1 It is agreed that the broad location of the site will be accessible by walking, cycling and bus travel on the basis that the southbound bus stop outside 250 and 252 High Street (north of the site), will be improved with raised kerbing, the existing public footway at the north-eastern corner of the site will be widened to 3 metres, and the remainder of the existing public footway along the site frontage onto Sturlas Way will be widened to 2 metres, as shown on site layout plan Revision K.

4.0 Pedestrian and Cycle Access

- 4.1 Both parties agree that site layout plan Revision K is acceptable in terms of pedestrian and cycle access.

5.0 Development Traffic Effect on the Surrounding Road Network

- 5.1 The vehicle traffic assessment at Section 4 of the Connect Transport Assessment, dated April 2021, is agreed by both parties.
- 5.2 It is agreed that the vehicle traffic associated with the proposed development will not have an unacceptable impact on the overall free and safe flow of public highway users.

6.0 Development Traffic Effect on the Road Safety

- 6.1 Based on the road collision analysis in Section 5 of the Connect Transport Assessment, dated April 2021, and on the subsequent technical note 'APP-TN02' contained in the Transport Proof of Evidence of Tim Britton, it is agreed that the collision data used in the analysis is correct and appropriate.
- 6.2 It is agreed that the proposed development traffic effect is not likely to have a detrimental effect on road safety.

7.0 Provision of Cycle Parking

- 7.1 Both parties agree that Broxbourne Borough Council is ultimately responsible for determining the acceptability of the proposed cycle parking provision.
- 7.2 Both parties agree that the proposed cycle parking provision is not unacceptable.

8.0 Provision of Car Parking

- 8.1 Both parties agree that Broxbourne Borough Council is ultimately responsible for determining the acceptability of the proposed car parking provision.

9.0 Delivery and servicing arrangements

- 9.1 Both parties agree the proposed delivery and servicing arrangements can be dealt with by way of a planning condition, with the site layout based on plan Revision K. A Delivery and Servicing Management Plan will include a commitment to the use of a Pedestrian Marshal.

10.0 Travel Plan

- 10.1 The Travel Plan submitted with the planning application (Connect Consultants, dated April 2021) has been updated to address comments raised by HCC.
- 10.2 The updated Travel Plan (Connect Consultants, dated 30 June 2022) is broadly agreed by HCC, for which the Appellant is willing to accept a planning condition.


11.0 Matters of Disagreement

- 11.1 Connect Consultants considers that the location of the site is already accessible by walking, cycling and bus travel, as set out in Section 2 of the Transport Assessment produced by Connect, dated April 2021. HCC however considers that the additional measures as outlined in paragraph 3.1 above are necessary to ensure the site is accessible by walking, cycling and bus travel for all users.
- 11.2 Connect Consultants considers that site layout plans Revision D and F provide access which is safe, sustainable, and accessible for all users.
- 11.3 HCC does not agree that site layout plans Revision D and F provide access which is safe, sustainable, and accessible for all users.

12.0 Signatures

Signed on behalf of the Appellant:

Signature:



Name: Tim Britton

Position: Associate Transport Planner, Connect Consultants

Date: 5th July 2022

Signed on behalf of Hertfordshire County Council:

Signature:

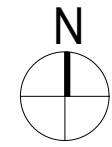


Name: Matthew Armstrong

Position: Area Manager (North & East), Highways Development Management

Date: 5/7/2022

WINSTON CHURCHILL WAY A121



SUBJECT TO SITE SURVEY, CONFIRMATION OF LEGAL BOUNDARIES, SITE CONSTRAINTS & HIGHWAYS

THE HARRIS GROUP LTD DOES NOT ACCEPT LIABILITY FOR ANY DEVIATION FROM OUR DRAWINGS OR SPECIFICATION

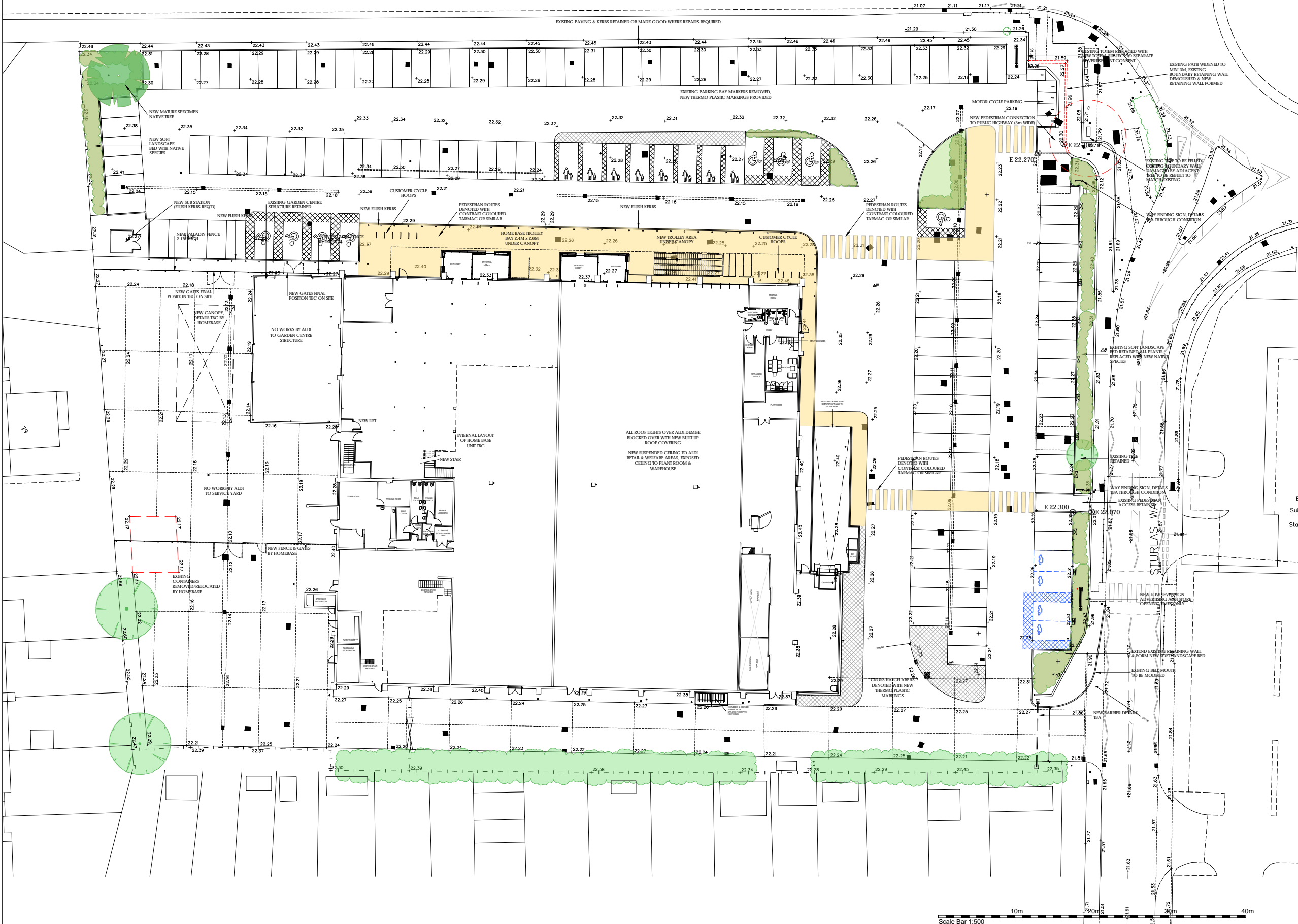
EXTERNALS:
SITE AREA (RED LINE) 12,159 SQ.M; 3.005 ACRES; 1.217 HECTARES

151 SHARED CUSTOMER SPACES INC 8 DDA, 8 PC, 4 ACTIVE EVCP & 18 PASSIVE EVCP; 5 MOTOR CYCLE SPACES; 24 CUSTOMER CYCLE SPACES; 10 STAFF CYCLE SPACES

EXISTING PROPOSED
PARKING BAYS 3,520 SQ.M (GEA)
PARKING AISLES 3,596 SQ.M (GEA)
2.5M X 5.0M
VARIES MIN 6M

ALDI FOOD STORE:
PROPOSED RETAIL AREA 1,756 SQ.M (GIA)
WAREHOUSE 1,262 SQ.M (GIA)
WELFARE 337 SQ.M (GIA)
EXTERNAL LOBBY 120 SQ.M (GIA)
INTERNAL WALLS 29 SQ.M (GIA)
RETAIL AREA 8 SQ.M (GIA)
WAREHOUSE 23.9M X 52.7M
7M

HOME BASE:
PROPOSED ROUNDABOUT GARDEN 2,371 SQ.M (GIA)
CENTRE STRUCTURE 1,706 SQ.M (GIA)
EXTERNAL LOBBY 29 SQ.M (GIA)
MEZZ 636 SQ.M (GIA)



Rev	Date	Description	Rev By	Chk'd By
K	01.07.22	KERBS & FOOTPATH AT VEHICLE ENTRANCE REVISED AS REQUESTED BY HCC	JPG	---
J	18.05.22	EXISTING SITE LEVELS ADDED, WAY FINDING SIGNS ADDED, COLOUR TARMAC EXTENDED	JPG	---
H	11.05.22	VEHICULAR ACCESS WIDTH REDUCED FURTHER FOLLOWING TRACKING	JPG	---



Project Title PROPOSED ALDI FOOD STORE AND HOME BASE UNIT
EXISTING HOME BASE UNIT
STURLAS WAY
WATHAM CROSS
EN8 7BF

Client ALDI STORES LIMITED - CORPORATE

Status PLANNING

Scale 1:500 **Drawing Size** A3

Date 14.09.20 **Drawn By** JPG **Checked** ---

Drawing Title PROPOSED SITE PLAN

Job-Dwg No 2924-COR-111 **Rev** K

- 2 St. Johns North, Wakefield, WF1 3QA t. 01924 291800
- Carvens Warehouse, 77 Dale Street, Manchester, M1 2HG t. 0161 2388555
- The Old Rectory, 79 High Street, Newport Pagnell, MK16 8AB t. 01808 211577
- 101 London Road, Reading, RG1 5BY t. 0118 9507700
- 10 Gees Court, St Christophers Place, London, W1U 1JJ t. 0207 4091215



Appendix CCL RPOE /02: The Harris Partnership Drawing '2924-COR-111K'

