

**Sent:** 10 April 2019 18:17  
**To:** Planning Mailbox  
**Subject:** Planning application 07/19/0200/F - Fairmead

**Response to Planning application from Hertfordshire County Council (T and CP GDP Order 2015)**

**District ref:** 07/19/0200/F  
**HCC ref:** BR/53/2019  
**HCC received:** 21/03/2019  
**Area manager:** Roger Taylor  
**Case officer:** Matthew Armstrong

**Location**

Fairmead  
90 Cuffley Hill  
Goffs Oak  
EN7 5EX

**Application type**

Full application

**Proposal**

Erection of 58 dwellings (17no. 2 bed , 14no. 3 bed, 22no. 4 bed, 1no. 5 bed) with associated infrastructure

**Decision**

Notice is given under article 18 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that the Hertfordshire County Council as Highway Authority recommends that permission be refused for the following reasons:

1) The site does not make sufficient provision for all residents and visitors to travel sustainably, and therefore does not comply with paragraphs 108 and 110 of the revised NPPF (2018) and policies 1, 5, 6, 7, 8, 9, 19 of HCC's LTP4 (2018). In particular, there is no detailed consideration of pedestrian and cycle

movements to and from key facilities/amenities, no improvements proposed to bus infrastructure for those residents and visitors of the development wishing to use this mode of transport, and no measures provided to ensure residents of the site can safely and conveniently cross the Cuffley Hill carriageway. The applicant has also not considered Hertfordshire County Council's planning obligations toolkit, and the importance of securing wider/pooled s106 contributions towards CIL compliant schemes.

2) There is insufficient information supplied with this application to enable the Highway Authority to reach a recommendation. In the absence of the necessary information, the Highway Authority recommends refusal due to doubt over possible implications for highway safety and convenience. In particular, there is a lack of vehicle tracking diagrams at the proposed access point to demonstrate it will not affect the free and safe flow of public highway users. The need for junction protection is also not considered.

#### COMMENTS:

This application for 58 dwellings (17no 2-bed, 14no 3-bed, 27no 4/5-bed) is located on land which has been allocated in Broxbourne's emerging Draft Local Plan for circa 26 dwellings (Rosemead and Fairmead Nursery sites). The site is currently derelict. Cuffley Hill is a busy B classified secondary distributor road subject to a 30mph speed limit. However, recent speed surveys from other nearby developments demonstrate that average vehicle speeds are slightly higher than this.

#### VEHICLE TRIP GENERATION:

The Transport Statement outlines a proposed vehicle trip generation of 33 two-way vehicle movements in the busiest peak hour (PM peak period). DfT's historic guidance stated that peak hour trips above 30 may represent a more significant impact on the highway, but the applicant has not undertaken any detailed modelling work.

The Highway Authority would raise concerns about the number of live planning applications in the vicinity of this site, and the cumulative impact of them taken together on the capacity of key junctions along Goffs Lane and Cuffley Hill. The Tina Nursery site along Goffs Lane for 81 dwellings has recently been approved by Broxbourne's planning committee, and two planning applications are currently out for consultation on land next to Tina Nursery, i.e. the former InEx garden centre (209 assisted living units and a care home). A planning application for land south of Goffs Lane proposes 53 dwellings, and the C G Edwards site next to this latest application proposes 23 houses. There are also pre-application discussions currently ongoing at other nearby Goffs Lane / Cuffley Hill developments. In addition, the Rosedale Park North development, the Rosedale Park South development, and the Brunton land development (all in the vicinity of this site) together total well over 800 dwellings (plus some commercial etc), of which the LPA is minded to grant.

The latter three developments propose capacity improvements to the Goffs Lane / Rosedale Way / Lt Ellis Way roundabout, and it is understood that contributions towards strategic /A10 improvements are also proposed.

In this case, the proposed 58 dwellings is notably above the allocated site figure, and raises concerns in a capacity context in light of all the other developments mentioned above. It is acknowledged that this application must be determined primarily on its own impact on the highway network, but the cumulative impact of this and other developments is still a legitimate material consideration.

Following discussions with the Borough of Broxbourne about the number of applications coming forward at this time, there is still not considered to be a need for detailed junction capacity modelling in the vicinity of the site given the scale of the development, however, a pooled contribution towards highway capacity improvement schemes is considered justified, due to its cumulative impact.

Broxbourne's Transport Strategy 2017 outlines a key scheme in the form of signalisation of the Newgatestreet Road / Goffs Lane junction, which would better manage the flow of traffic through this

junction as well as benefit pedestrian movements (therefore embracing the ever-increasing focus of both national and regional planning policy on sustainable travel). The Strategy estimates costing of this scheme to be £250,000, and a pooled s106 contribution towards this should be sought from this development.

#### ACCESS ARRANGEMENTS:

The site currently has a vehicle access towards its eastern boundary serving a private access road, which also leads to number 90 Cuffley Hill. Paragraph 4.11 of the Transport Statement states that this will be retained for the purposes of access to number 90 (outside the application boundary), but will no longer be used as a means of access to the site.

A new access to the site will be created on land between 92 and 94 Cuffley Hill. This sits in a central location along a small service road of Cuffley Hill accommodating 5 houses. Following pre-application advice from the Highway Authority, this new access / access road is shown to continue directly out onto Cuffley Hill to create a new priority junction, with the two existing service road junctions closed up. This will create two cul-de-sacs either side of the new access road but continues to provide direct vehicle access to the existing houses along this stretch.

Pedestrian dropped kerbs and tactile paving are shown on both sides of the proposed access where it meets the Cuffley Hill service road and the main Cuffley Hill carriageway. The inclusion of these are welcome. It is noted that the existing footway along the back edge of the Cuffley Hill service road is to be the route which pedestrians must take into and out of the site. Pedestrians who are unfamiliar with this setup may continue along the main Cuffley Hill footway and route into the site via the new vehicle access road, and in doing so are forced onto its carriageway. It would be beneficial if the small extent of new footway around the new junction kerb radii onto the main Cuffley Hill carriageway was extended around its full length, with additional pedestrian dropped kerbs / tactile paving provided to facilitate pedestrian movements over the two cul-de-sac service road sections. However, this would result in the removal of two existing trees on the grass verge, and it is appreciated that this may not be acceptable to the LPA in a wider amenity aspect. In addition, most pedestrians wishing to access the site will quickly become familiar with the arrangement, and it is likely that only a handful who are unfamiliar with the area will, on occasions, walk into the site via the main vehicle point, along the carriageway.

It should be noted that parts of the existing service road footway are notably encroached upon by vegetation on adjacent private land, in particular at the western end (i.e. along the eastern boundary of number 100 Cuffley Hill). This should be cut back to ensure the full width of the existing 1.8 metre wide footway is brought back into use.

In terms of the junction design, an initial access width of 7.2 metres is shown, tapering down to 5.5 metres within the site. A 'left-in' tracking drawing of a 12.2 metre-long refuse lorry has been submitted, but no other movements have been submitted (i.e. left-out, right-in and right-out). These were requested in our pre-application discussions with the applicant, and are needed to establish what the amount of overtrack onto the opposite side of the Cuffley Hill carriageway will be (and therefore what the resultant impact on the free flow of traffic will be). There is also evidence of body overhang onto the new footway within the new access road as a refuse vehicle makes a reversing manoeuvre. The same tracking exercise should also be undertaken for a mid-sized service vehicle, such as a supermarket delivery van at circa 6.5 metres length.

The applicant should consider the introduction of a new right turn lane along Cuffley Hill into their site with associated carriageway widening. Whilst a right turn lane is not strictly necessary purely in a capacity context, it will greatly assist the tracking of larger vehicles in and out as outlined above. In addition, it will allow for the introduction of a pedestrian central refuge island, enabling residents of this development to safely and conveniently cross the road to access the bus stop on the opposite side of the road. This is considered in more detail in the Sustainability section below. Furthermore, the inclusion of a right turn lane will create a consistent approach to the numerous other developments now coming forward along Cuffley Hill / Goffs Lane (as outlined at the start of this report), the majority of which the Highway Authority has

also requested right turn lanes. The suggestion of a right turn lane was included in our pre-application advice to the applicant.

The one refuse vehicle tracking diagram that has been submitted also shows a reversing manoeuvre around the new access road into the service road, but this does not take into account cars which are likely to be parked up along the side of the service road. Parked cars are however shown on the other tracking diagrams submitted. Short sections of double yellow line protection will be needed around the new main junction onto Goffs Lane, and around the initial stretches of the service road on both sides to ensure service vehicle turning manoeuvres such as that shown can be realistically accommodated. This should be marked on a revised plan.

In terms of visibility splays from the proposed access point, it is clear that these can be achieved entirely over public highway land. The technical standard for a 30mph road is splays of 2.4 metres X 43 metres in both directions, and these have been marked on the plan. However, as mentioned at the start of this report, there is evidence of average vehicle speeds slightly exceeding the limit. As such, the splays should also be lengthened slightly. Again however, this is comfortably achievable over public highway land, and therefore the arrangement in this respect is acceptable.

#### INTERNAL LAYOUT:

The applicant has included tracking diagrams of a refuse vehicle turning around at several locations within the site. These are rather tight in places but with a couple of additional back and forth movements should be ok overall.

Visibility from individual driveway accesses is not shown across the site (in particular, pedestrian visibility).

Some clarification would be helpful on the treatment to be applied at the points where internal footways cease and enter shared surface carriageways, especially where speed tables form a part of the design. It would not be desirable for those in wheel chairs for example to have to route up or down a speed table where footways cease.

The LPA should be sure that the proposed trees/planting will not interfere with the necessary level of internal visibility at junctions and forward visibility around bends.

#### PARKING:

When applying Broxbourne's parking standard, a total of 150 on-site spaces should be provided. The applicant is proposing 160 and therefore there should be no routine increase to roadside parking in the vicinity of the site as a result of this development. Broadly the spaces meet technical standards in terms of dimensions and manoeuvrability space around them.

#### SUSTAINABLE TRAVEL AND ACCESSIBILITY:

A development of this scale requires a Travel Plan Statement, and the applicant has submitted one which is still under review by our Travel Plan team. Their comments will be sent to the LPA in due course.

The Transport Statement provides a broad overview of the sustainable travel infrastructure in the vicinity of the site, but there are no proposals to improve this.

It is noted that neither of the two closest bus stops to the site along Cuffley Hill benefit from raised Kassel kerbing, and only one has a shelter in place.

In addition, it is not clear how pedestrians from this site will safely cross from one side of the Cuffley Hill carriageway to the other in order to access the bus stop on the opposite side of the road.

Furthermore, the cumulative impact of this development in a wider sustainability context is not considered in the application, and there are a number of relevant sustainability schemes in the vicinity of the site for which it would be justified to expect a pooled section 106 contribution

The revised NPPF (2018) has a greater emphasis on the importance of sustainable travel compared to its predecessor. Paragraph 108 states that developments should ensure that "safe and suitable access to the site can be achieved for \*all\* users". This includes children, those with disabilities / in wheelchairs, those with sight problems, those with buggies, etc. It also states that developments should show that that "appropriate opportunities to promote sustainable transport modes can be – or have been – taken up". Paragraph 110 goes on to states that "development should give priority first to pedestrian and cycle movements... create places that are safe, secure and attractive, which minimise the scope for conflicts between pedestrians, cyclists and vehicles".

Hertfordshire County Council's new Local Transport Plan 4 (2018) also places a much greater emphasis on the importance of sustainability/accessibility. Policy 1 for example states that the first step to consider is that "opportunities to reduce travel demand and the need to travel" are identified. After that, the needs of vulnerable road users (such as pedestrians and cyclists), then passenger transport users, must come ahead of those who use motorised forms of travel.

Hertfordshire County Council's planning obligations toolkit sets out the level of contribution which is considered appropriate in proportion to the scale of development. Based on the development mix proposed in this case, and applying SPONS indexation from the 2008 quoted figures, today's equivalent headline sustainable transport contribution figure is around £103,500. However, in more recent years the Highway Authority has requested most highway improvement works to be delivered by a section 278 agreement via a planning condition rather than as an s106 financial contribution. This is because it gives greater certainty to the works being delivered in time and presents less of a risk to public funds. The cost of any works delivered in this way would be deducted from the £103,500 headline figure quoted above (so long as they have a wider public benefit), and the remaining amount assigned to any appropriate longer term CIL compliant schemes identified in the area.

With all this in mind, it is considered justified to request that the two closest bus stops are upgraded to include raised Kassel kerbing and a shelter, to be delivered through a Grampian planning condition by s278. The applicant also needs to introduce a pedestrian central island and associated widening of the carriageway to assist such movements, as outlined in the 'Access' section above, again by Grampian planning condition. This could then be designed into a formal right turn lane at the new access proposed, which would ensure the free flow of traffic along Cuffley Hill is better maintained at all times.

The applicant should also undertake a pedestrian audit to show how residents and visitors at their site will safely and conveniently access key facilities and amenities. This would reasonably include the route to the Goffs Lane / Newgatestreet Road shopping parade, with proposed improvement measures stated in the audit. Such measures would include for example the introduction of pedestrian dropped kerbs and tactile paving at those junctions which currently do not benefit from these, over which residents and visitors of this development must cross in order to access the shopping parade (e.g. Robinson Avenue). To the west, the audit would cover the route to Cuffley Rail Station.

It would be reasonable for the cost of any works identified from the pedestrian audit, the bus stop improvement works, and a central pedestrian refuge island to be deducted from this headline s106 figure quoted above as they all have a wider public benefit. Once the applicant has carried out the investigative and design work for all this, along with estimated costings, the reasonableness of any request for a s106 financial contribution can be considered. Most notably however, Broxbourne's new Walking and Cycling Infrastructure Strategy earmarks numerous routes in this area for which improvements are desired. Also as

mentioned in the Vehicle Trip Generation section above, a pooled contribution towards the signalisation scheme of the Newgatestreet Road / Goffs Lane junction would also be justified.

The above detail was provided to the applicant in our pre-application advice.

**CONCLUSION:**

For the reasons given above, it is recommended that this application be refused at this stage.

**Matthew Armstrong**

**Date 10/04/2019**

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