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

### Director of Planning

St Albans City & District Council  
St Peters Street  
St Albans  
Hertfordshire  
AL1 3JE

District ref: 5/2022/2443  
HCC ref: SA/14229/2022  
HCC received: 7 July 2023  
Area manager: Rosemary Chatindo  
Case officer: Chris Carr

### Location

Bricket Wood Sports And Country Club, Paintball Site & Bricket Lodge, Lye Lane, Bricket Wood AL2 3TF

### Application type

Outline

### Proposal

ADDITIONAL/AMENDED PLANS & INFO  
ADDITIONAL INFORMATION

Outline application (access sought) - Demolition of existing buildings and construction of up to 115 dwellings and creation of new access

### Recommendation

Notice is given under article 22 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that Hertfordshire County Council as Highway Authority recommends that permission be refused for the following reasons:

- Given the site's proximity to major roads, as well as the current lack of safe, convenient pedestrian and cycle provision, there is a significant challenge to make this site sustainable. Until concerns about the feasibility of the Proposed footway to the South are fully addressed it would not be appropriate to recommend permission with a condition that may not be deliverable (and therefore may not be enforceable) and is critical to the sustainable access of this site. Specifically, the highlighted Ancient Woodland, Common Land, minimum carriageway width and suitable level of protection of cyclists' design constraints must be satisfactorily addressed, with the designer of the Proposed footway to the South clearly stating any necessary relaxations or departures from standards (please refer to Manual for Streets, Inclusive Mobility and LTN1/20 design standards).
- The site is in an area with currently modest levels of public transport accessibility. Further evidence of engagement with local bus operators to explore and pursue any opportunities to promote walking, cycling and public transport use is needed.

- The submitted drawings demonstrate that the available space at the site access junction and the Lye Lane / West Riding junction is inadequate for a refuse collection vehicle and a large car to safely pass each other during entry or exit. Furthermore, there remains a concern of a potential scenario of two larger vehicles (such as two service delivery vehicles or a service delivery vehicle alongside a refuse collection vehicle) needing to manoeuvre past each other safely.
- The feasibility of constructing the footway in the woodland area south of the M25 overbridge raises concerns. It is advised to demonstrate the deliverability of the footway through the ancient woodland stretch by adhering to the relevant guidelines and standards applicable for construction within or near the ancient woodlands.
- No vehicle access restrictions are proposed for the site's North entry via the Lye Lane / A405 junction, which offers the direct and shortest route to the SRN at M25 J21a. The applicant must demonstrate the feasibility of safe vehicle access from the North by providing vehicle swept path analysis or provide a rationale for access restrictions for the development.
- Revised Stage 1 RSA and the associated Designer's Response will be required.

### **Description of Proposal**

Planning application for the demolition of existing buildings and construction of up to 115 dwellings and creation of new access.

HCC Pre-application consultation is presented at Appendix I of the TA (January 2023 Update).

### **Site Description**

The site location and context are shown in Appendix A of the TA (January 2023 Update).

The site is located approximately 4.5km south of St Albans, 4.5km east of Abbots Langley and 7km north of Watford. The site is bounded to the west by Lye Lane and to the south by the M25. The site is within the settlement of How Wood.

Lye Lane in Bricket Wood is within the St Stephen ward/electoral division, which is in the constituency of St Albans. The site can be accessed from Lye Lane which leads from the A405 North Orbital. The site can also be accessed from the south from the West Riding / Oak Avenue junction with Lye Lane.

The nearest train station to the site is Bricket Wood Station which is 1km south of the site. How Wood railway station is also a short distance away from the site around 1km to the north of the site.

Lye Lane is a narrow lane, North of the site Lye Lane narrows to 4.2m, there are no centre line markings present along the entire length of Lye Lane. The carriageway is subject to a 30mph speed limit, although the repeater signs and markings are sub-standard. Lye Lane south of the site does not feature footways. To the north of the site, again, there are no footways until Lye Lane reaches the A405 North Orbital Road.

Currently there are no safe and suitable pedestrian accesses to the site, which has 30 existing dwellings. No footways or street lighting are located on Lye Lane and connections to local amenities and public transport facilities is inadequate. Lye Lane is currently unlit, with no highway street light assets present. Lye Lane is part of the gritting network, and the gullies/drainage are subject to an 18 monthly cleaning programme, maintainable at public expense. Large potholes and flooding caused by blocked gullies are regularly reported along Lye Lane. The highway authority classifies Lye Lane as a P1/M1 (e.g. Rural Lane) and an L2 Local Access. The nearest public right of way (PROW) footpath is PROW 060, which the 2015 statement states "commences at junction with Lye Lane at Black Green thence NE to rejoin Lye Lane opposite Blackwood Green".

There is an existing permission for a hotel with 150 bedrooms, conference, and function centre, associated car parking, realignment of A405 roundabout and retention of bungalow (5/2018/2666) at the northern end of Lye Lane on the A405 North Orbital Road. There are also two single dwelling permissions (5/2019/3030 and 5/2020/1615) in the vicinity of the site with access via Lye Lane.

M25 Junction 21a in the immediate vicinity of the site is a recorded congestion hotspot, this is part of the strategic road network. There is designated Ancient Woodland and Wildlife Sites in Blackgreen Wood to the South of the site, along the Eastern side of Lye Lane. The site is designated Green Belt. Part of Lye Lane to the South of the Site is designated Common Land (Bricket Wood Common, Smug Oak Common & Black Green).

## **Analysis**

The following documentation has been submitted in support of this application:

- Highways Technical Note Milestone Transport Planning
- Drawing 23051/001-A-Proposed 'Active' Travel Improvements to Lye Lane and (Rev B drawings for Sheet 3,4,5 and 6)
- Drawing 23051/002-A-Proposed Lye Lane Cross Sections
- Drawing 23051/TK01-A-Swept-Path Analysis: Large Refuse Vehicle Accessing / Private Car Egressing the Site
- Drawing 23051/TK02-A-Swept-Path Analysis: Large Refuse Vehicle Egressing / Private Car Accessing the Site
- Drawing 23051/TK03-A-Swept-Path Analysis: 7.5t Box Van Accessing / Private Car Egressing the Site
- Drawing 23051/TK04-A-Swept-Path Analysis: 7.5t Box Van Egressing / Private Car Accessing the Site

## **History**

The applicant has undertaken pre-application consultation with HCC, including review of pre-application documents for schemes comprising 113 and 109 residential units respectively. This included a pre-application meeting on 30 March 2022, these discussions were then referred to as appropriate in HCC's subsequent response of 4 April 2022. The 4 April response commented on the following documents:

- Paul Mews Associates, January 2022, Bricket Lodge, Sport and Country Club and Paintball Site, Lye Lane, Bricket Wood, Feasibility Assessment ("the Feasibility Assessment");
- A set of sketch plans from Tom Gristwood Architects, dated 8 February 2022 and titled "Bricket Lodge - Developed Sketch Proposals" ("the Sketch Proposal").

The 4 April response included recommended matters for consideration as part of any Transport Assessment (TA) and Travel Plan (TP). Following this initial pre-application correspondence, HCC reviewed at pre-application stage a draft TA and TP provided by the applicant as follows:

- Paul Mew Associates, July 2022, Proposed Residential Development at Former Bricket Wood Sport and Country Club / Paintball Site, Lye Lane, Bricket Wood, Transport Assessment ("the TA");
- Paul Mew Associates, July 2022, Proposed Residential Development at Former Bricket Wood Sport and Country Club / Paintball Site, Lye Lane, Bricket Wood, Travel Plan ("the TP").

Comments on "the TA" and "the TP" were provided to the applicant by HCC on 2 August 2022. The 2 August comments provided by HCC reiterated that, given the site's proximity to major roads, as well as the current lack of safe, convenient pedestrian and cycle provision, there is a significant challenge to make this site sustainable.

Improvements to pedestrian connectivity between the site and local amenities and public transport links, such as Bricket Wood rail station, were highlighted by HCC as being of particular importance. It

was noted by HCC in the response dated 2 August that the proposed new footpath presented by the applicant (enclosed within Appendix G of the draft TA and in Appendix E of the TP) running along Lye Lane to link the site to West Riding would be required as a minimum.

It was also highlighted by HCC however that the implementation of this footway may be a significant engineering challenge given for example the presence of ditches and established trees on Lye Lane where the footway is proposed. This may affect its feasibility and in-practice deliverability and may require third-party land (outside of the public highway) in order to adequately mitigate these issues. The following transport related documents were originally submitted with application 5/2022/2443:

- Paul Mew Associates, July 2022, Proposed Residential Development at Former Bricket Wood Sport and Country Club / Paintball Site, Lye Lane, Bricket Wood, Transport Assessment (“the TA”).
- Paul Mew Associates, July 2022, Proposed Residential Development at Former Bricket Wood Sport and Country Club / Paintball Site, Lye Lane, Bricket Wood, Travel Plan (“the TP”).
- Paul Mew Associates, 26 August 2022, P2584 Bricket Wood Development, Response to HCC comments of 2nd August 2022.
- Allen Transport Consultancy Ltd, September 2022, Lye Lane, Bricket Wood, Hertfordshire, Proposed S278 Highway Works, Stage 1 Road Safety Audit (“S1RSA”) -Appended to the S1RSA Response.
- Paul Mew Associates, September 2022, Lye Lane, Bricket Wood, Stage 1 RSA Response (“the S1RSA Response”).
- Paul Mew Associates, 29 September 2022, P258: Land North of Bricket Wood, Herts, Proposed Site Access Junction Layout Drawing.
- Paul Mew Associates, 29 September 2022, P258: Land North of Bricket Wood, Herts, Proposed New Footway to South (4 Parts).
- Paul Mew Associates, 29 June 2022, P258: Land North of Bricket Wood, Herts, Refuse Vehicle Swept Path Analysis.

In its previous response dated 31/03/2023, HCC reviewed an updated TA and associated documents as listed below:

- Transport Assessment (TA) – updated January 2023
- Proposed site plan – Revision C
- Design and access statement
- Planning statement
- Highway boundary plan for Lye Lane
- Proposed new footway to South
- Specification for proposed footway base

The lack of safe, convenient pedestrian and cycle provisions was highlighted by HCC. It was also noted in the response dated 6 April 2023, that until concerns about the feasibility of the Proposed footway to the South are fully addressed it would not be appropriate to recommend permission with a condition that may not be deliverable (and therefore may not be enforceable) and is critical to the sustainable access of this site.

It was also highlighted that with the introduction of the Proposed footway to the South on Lye Lane, large refuse and servicing vehicles most likely encroach across the centre of the carriageway.

In addition, the modest levels of public transport accessibility were also highlighted.

In view of the above critical observations, HCC refused the permission and further requested the following.

- Designs addressing the suitable level of protection for cyclists, with the designer of the Proposed footway to the South clearly stating any necessary relaxations or departures from standards (please refer to Manual for Streets, Inclusive Mobility and LTN1/20 design standards).
- Further swept path analysis of the carriageway on Lye Lane is required to demonstrate compliance with standards (please refer to Manual for Streets design standards). Any necessary relaxations or departures from standards should be clearly stated by the designer.
- Further evidence of engagement with local bus operators to explore and pursue any opportunities to promote walking, cycling and public transport use is needed.

A Highway Technical Note along with a set of drawings including plans showing active travel improvements to Lye Lane and vehicle-swept paths have now been submitted, these documents have been reviewed by HCC further below.

### **Planning Policy**

The applicant has provided evidence that the National Planning Policy Framework (NPPF – July 2021), St Albans City and District Local Plan (1994) - being replaced by a new Local Plan (2020-2038), HCCs Local Transport Plan 4 (2018), St Albans City and District Revised Parking Policies and Standards (2002); and HCC's Roads in Hertfordshire: Highway Design Guide (3rd Edition) has been reviewed. Due to the nature of the application, this is considered acceptable.

In its previous response, HCC recommended to also provide evidence of consideration of the following policy documentation:

- National Planning Practice Guidance (2014);
- Town and County Planning General Permitted Development (2015); and
- St Stephen Parish Neighbourhood Plan (2022).

St Stephen Parish Neighbourhood Plan (made July 2022) includes the objective to improve transport and movement, through further development of public transport provision and other non-car travel modes, whilst ensuring a safe environment for pedestrians, cyclists, and horse-riders as well as motorists.

The site is not allocated for residential development in the current St Albans Local Plan. Between 25 January and 8 March 2021, St Albans City & District Council held a 'call for sites'. It is understood that this site has been submitted as part of this process. Over 200 sites have been submitted as part of this process. The Council are currently reviewing these sites (as well as hundreds of others) as part of its Housing and Employment Land Availability Assessment. A wide range of other technical work is currently underway including: a comprehensive investigation of Urban Capacity; a new Green Belt Review; Sustainability Appraisal and Strategic Environmental Assessment; and an Infrastructure Delivery Plan.

The submitted Highway Technical Note does not discuss these policy documentations, as such it is recommended that the applicant should provide evidence of consideration of these policy documentations.

### **Trip Generation & Distribution**

Trip generation forecasts have been prepared for the existing and proposed uses by means of the TRICS database. The proposed development will provide up to 115 mixed (private and affordable) dwellings.

Table 8 of the updated TA (January 2023) presents the proposed total person, car based and rail trip generation. This revised assessment is accepted.

As set out previously it is requested that full turning flow diagrams / matrices (including the observed 2022 year and the future assessment year of 2035 with and without development) are provided so that the junction modelling inputs can be checked. Information of this type was included at Appendix J of the previous TA but this information appears to be superseded and was not included in the updated TA (January 2023).

In its previous response, HCC requested to include the latest full turning flow diagrams/matrices (including the observed 2022 year and the future assessment year of 2035 with and without development). However, the submitted Highway Technical Note didn't include the same.

### **Impact on the Highway - Junction Assessment**

Peak hours for assessment have been determined by means of automatic traffic count surveys undertaken on Park Street Lane between 25/04/22 and 01/05/22. The results of the ATC surveys are shown in Appendix F of the TA (January 2023 Update) and demonstrate that the AM peak hour is 08:00 to 09:00 while the PM peak hour is 15:00 to 16:00. Full ATC survey data is shown in Appendix F of the TA (January 2023 Update).

The proposed 'worst case' development (115 dwellings) has been shown to generate 101 vehicle trips in the AM peak hour and 96 vehicle trips in the PM peak hour.

Junction capacity assessments have been carried out to determine the impact of the development on the junctions of:

- A405/Lye Lane,
- Lye Lane/Oak Avenue/West Riding Junction and
- Lye Lane/Park Street Lane

Baseline manual classified turning count surveys were undertaken at these junctions on 26/04/22. Full details of the 'baseline' manual classified turning count surveys are shown in Appendix J in the updated TA (January 2023).

To assess whether this was a 'typical' weekday, the ATC data collected for Lye Lane, as set out in Appendix F of the TA (January 2023 Update), has been examined. The average total weekday two-way flow on Lye Lane was 1145 vehicles per day. The 'median' total weekday two-way flow on Lye Lane was 1148 vehicles per day. Total weekday two-way flows on Lye Lane on the day of the manual classified turning count surveys was 1158 vehicles per day. As such it is concluded that the manual classified turning count survey data is typical.

The 'baseline' manual classified turning counts were then 'growthed' to the future year of 2035 (10 years after the assumed opening year of 2025) to reflect background traffic growth. Full details of the 'future year' turning movements (OD tables) are shown in Appendix J of the TA (January 2023 Update).

Separate growth rates have been derived for AM and Interpeak periods to correspond with peak hours identified. In addition to TEMPRO growth data for the future year of 2035, fuel / income adjustment factors for the future year of 2035 have also been applied based on TAG Unit M4 and the TAG Data Book (May 2022 v1.18) Table M4 2.1. Resulting growth rates for the future year of 2035 are presented at page 23 of the TA (January 2023 Update). These TEMPRO Growth Factors, TAG Income & Fuel Cost Factors and Total Growth Factors calculations have been independently replicated and are considered valid.

Due to the central reserve on the A405 North Orbital Road, the only site traffic related movements are the left turn from the A405 into Lye Lane, and the left turn movement out of Lye Lane on to the A405. It is noted that only a small proportion of site flows have been assigned to Lye Lane north of the site.

PICADY assessments for the Lye Lane / A405 North Orbital Road junction, the Lye Lane / West Riding / Oak Avenue junction, the Lye Lane / Park Street junction and the New Site Access / Lye Lane junction for the future year with development flows is presented in the TA (January 2023 Update). These junction assessments have been independently checked and verified. The assessments show that in both the AM and PM peak hours, there would be low Ratios of Flow to Capacity (RFC's) and minimal queuing on all junction arms. The Level of Service during both peak periods would be acceptable in highway capacity terms.

### **Highway Safety**

A S1RSA and subsequent S1RSA Response have been submitted with the application. The S1RSA raises the following issues:

- Potential restricted visibility for motorists seeking to emerge from the development site access.
- Inadequate swept path requirements of larger vehicles negotiating the proposed development site access.
- Lack of dropped kerb provision across site access junction and within proposed development site.
- Potential restricted inter-visibility for pedestrians transitioning from the footway to the north of the site and the carriageway.
- Potential restricted inter-visibility at the proposed crossing facilities on the proposed new footway south of the site.
- Potential swept path requirements of vehicles accessing and egressing the existing access junction and vehicular crossovers on Lye Lane with proposed new footway in-place.
- Narrowed section of proposed footway (on the eastern side of Lye Lane).
- Location of existing ditches in proximity to the proposed new footways on Lye Lane.

The S1RSA Response accepts the issues raised in the S1RSA and amended drawings are included as part of the S1RSA Response, and separately as part of the application submission, to reflect the S1RSA findings.

The S1RSA and S1RSA Response is generally accepted by HCC, notwithstanding the potential issues in terms of the deliverability of the proposed new footway on Lye Lane.

It is also noted that the updated 'Proposed Site Access Junction Layout' Drawing (29 September 2022) includes a dropped kerb and tactile paving at the proposed short section of footway north of the site access (S1RSA 'Location F'). The tactile paving would need to be omitted (given that there is no footway on the western side of Lye Lane).

Furthermore, it is noted that some of the additional dropped kerbs and tactile paving that are now shown on the 'Proposed Uncontrolled Pedestrian Points with Dropped Kerbs' Drawing (29 September 2022) which is included at Appendix B of the S1RSA Response are not to standard.

Appendix C of the updated TA (January 2023) presents updated map extracts showing road traffic accidents by severity for the 5-year period 2017 to 2021 in the area around the development site which resulted in all casualty types. This includes the following locations as requested by HCC:

- The area of Bricket Wood surrounded by the following roads, and including these roads themselves:
- West Riding;
- Oak Avenue;
- Park Street Lane west of Station Road (also referred to as Lye Lane east);
- Station Road;
- Mount Pleasant Lane.
- Lye Lane up to and including the junction with A405 North Orbital Road.

The submitted Highway Technical Note include drawings for active travel improvement onto Lye Lane. The applicant has mentioned submitting a revised Stage 1 RSA along with a revised Designer's Response. Upon receipt of the revised Stage 1 RSA and the associated Designer's Response, HCC will further review and provide their response.

### **Refuse and Service Delivery**

Appendix H of the updated TA (January 2023) presents swept path analysis of a refuse vehicle within the site, demonstrating these can access and egress the site in forward gear.

In the previous response, HCC highlighted concern that Lye Lane with the introduction of the Proposed footway to the South off-site highway works, large refuse and servicing vehicles would encroach across the centre of the carriageway. When confronted by a vehicle coming the opposite direction it is likely they would also choose to encroach onto the kerbed footway, which would generate a safety concern for any vulnerable users, pedestrians and cyclists.

In addition to refuse vehicles, other larger vehicles such as Supermarket delivery or long wheelbase panel vans (i.e. Amazon, DPD) undertaking deliveries for various companies on a more frequent basis than refuse vehicles could also impact upon the required junction and carriageway geometries to accommodate such vehicles.

As such, HCC recommended submitting further swept path analysis of the carriageway on Lye Lane to demonstrate compliance with standards. Any necessary departures from standards should be clearly stated by the designer.

Appendix 5 and Appendix 6 of the Highway Technical Note present swept path analysis for a combination of vehicles including,

- Large Refuse Vehicle Accessing/ Private Egressing the site
- Large Refuse Vehicle Egressing / Private Accessing the site
- 7.5t Box Van Accessing / Private car Egressing the Site
- 7.5t Box Van Egressing / Private Car Accessing the Site

The submitted drawings demonstrate that the available space at the site access junction and the Lye Lane / West Riding junction is inadequate for a refuse collection vehicle and a large car to safely pass each other during entry or exit. Furthermore, the drawings do not address the potential scenario of two larger vehicles (such as two service delivery vehicles or a service delivery vehicle alongside a refuse collection vehicle) needing to manoeuvre past each other safely.

### **Highway Layout - Access**

In summary, the proposed development is:

- Stopping up an existing vehicular access on Lye Lane and providing a new site access junction on Lye Lane, which is to be located north of the existing vehicular access for the paintball centre. The new site vehicle access will take the form of a priority junction;
- Providing new footways on Lye Lane, between the development site access junction and the junction of West Riding to the south of the proposed development site. The footways include a number of uncontrolled pedestrian crossing facilities, which incorporate dropped kerbs and tactile paving.

A sightline assessment was carried out for the proposed site access based on 85th percentile speed data collected as part of a 5-day weekday automatic traffic count survey carried out on Lye Lane adjacent to the location of the previously and current proposed site access. The 85th percentile speed assessment was based on the interpeak period of 10:00 to 15:00 on dry weekdays in April 2022 with speeds corrected for wet weather conditions. Full results of the automatic traffic



count survey are presented in Appendix F of the updated TA (January 2023).

The surveys revealed that the 85th percentile southbound speed was 29.2mph and the 85th percentile northbound speed was 28.4mph. In line with Manual for Streets these equate to sightline requirements of 43m. Appendix E of the updated TA (January 2023) demonstrates that these sightlines can be achieved from the proposed site access. It is not clear that Manual for Streets is the correct standard to apply as there is no active frontage along Lye Lane, DMRB standard may be more applicable.

No limitations have been suggested for vehicles to enter or exit the site from the North using the Lye Lane / A405 junction, which offers the most direct route to the Strategic Road Network (SRN) at M25 J21a. The applicant must provide evidence of safe vehicle access from the North or provide a valid rationale for imposing a restriction on vehicle access to facilitate this development.

### **Cycling & Pedestrian access**

The latest Highways Response to Jan comments states:

“Our report showed that a 2m footpath can be formed within highway land boundary. We showed the OS mapping land boundary that we have found to be reasonably accurate in past experiences and this accords with the highway boundary as supplied by HCC attached.

Trees and bushes have grown up within the highway land such that it is difficult to see the land boundary on site. Some pruning and selective felling of trees may be needed within highway land to accommodate a new footpath. We are not convinced that a fully metalled surface would be practicable with the proximity of tree roots. The provision of a footpath could be made by laying a granular subbase and a graded aggregate wearing course. This would permit natural drainage and would blend in well with the rural nature of Lye (sic) Lane. Kerbing could be provided, and lighting could be provided using PV cell power units.

The aim of the footpath assessment at this stage is to demonstrate that it is feasible within the land available without encroaching into third party land ownership.

It is not considered necessary to provide detailed engineering drawings at this pre-planning stage which at any rate could be made a condition of planning consent.

In line with HCC's previous responses, a footway from the site to the existing footway provision at West Riding is an essential part of the non-car transport provision that is required to make the development acceptable, though it is only a part of the required improvements.

For example, the route has very little passive surveillance and no lighting (it is not clear if the proposed PV cell power units are intended for adoption?), including existing parts of the pedestrian route between the southern end of the path and Bricket Wood station. The necessary improvements would need to be identified as part of a walking and cycling audit of the routes between the site and key local destinations. The exact scope of the audit would need to be agreed with HCC, along with the subsequent upgrades required, which would need to be delivered by the applicant through a S278 agreement.

Alternative non-car travel options would also be needed for those people uncomfortable with using the route due to security concerns and it is suggested that these measures would need to be incorporated and agreed with HCC as part of a robust Full Travel Plan.

As previously advised, implementation of the footway may be an engineering challenge due to the presence of ditches, gullies and trees (including designated Ancient Woodland and Common Land) located along Lye Lane where the footway is proposed. This may affect its feasibility and deliverability

and there is concern that reducing the scale and / or form of the footway in order to overcome these engineering challenges and constraints would reduce the effectiveness of the footway and would not then meet the necessary requirements for assisting in providing safe and convenient travel to and from the site for all users, at all times of day and year and in all conditions. Further consideration of the needs of cyclists is also necessary, the applicant should demonstrate consideration of LTN1/20 standards in this regard.

Given the fundamental importance of the footway in assisting in meeting the required sustainability credentials of the site, additional information is required in respect to the design of this footway, including matters such as drainage (noting the proposed SUDS specification supplied) and associated impacts on trees (including Ancient Woodland designated areas) and how these matters would be resolved. Details of proposed lighting provision are also required, including clarification of whether the proposed PV cell power units are intended for adoption.

In any design solution presented, the new footway needs to be continuous (occasional crossing points permitted), 2 metres minimum width (although a 3 metres width shared use path might also be considered), fully metalled (noting the applicant's comments), fully lit (see above) and fully kerbed between the site access and West Riding.

At the current time, the deliverability of this footway is still not known. The proposed condition, included within the Highways Response to Jan comments document, is therefore not enforceable and is not compliant with the 6 tests in NPPF for suitable planning conditions. The drawings provided to-date do not provide sufficient detail to enable an informed view to be taken. Given the fundamental importance of the footway it is requested that a feasibility study or similar be provided by the applicant that details how the footway will be delivered in engineering terms. This would need to include detailed drawings on a topographical base and would need to include details of engineering solutions to mitigate the impact in term of matters such as drainage and trees. It would also require details of any third-party land (i.e. land outside of the public highway) that may be required, an overlay of the HCC Land Boundary data supplied will be useful. Any details of agreements that have been put in-place to secure use of any required land will also be needed.

The submitted Highway Technical Note include 'Active Travel Audit' of identified 7 routes as mentioned below.

- Route 1 – Lye Lane (N): Extending circa 650-metres north from the Site to the St Stephen 018 Footpath.
- Route 2 – Lye Lane (S): Extending circa 490-metres south from the Site to the give-way priority junction with West Riding. This route provides access to both the St Stephen 015 and 030 Footpaths, the Woodbury Field Playground, and green space to the east of Lye Lane.
- Route 3 – West Riding extending south-west from Lye Lane for circa 685-metres to the mini-roundabout junction with Mount Pleasant Lane. This route provides access to the Site's nearest bus stops (adjacent to Grassington Close) and local amenities at the junction with Oakwood Road.
- Route 4 – Mount Pleasant Lane, extending south-west for circa 600-metres to the Mount Pleasant Lane Junior Mixed Infant School.
- Route 5 – Oak Avenue / Black Boy Wood, providing access to St Stephen 011 Bridleway and local amenities located on the northern side of Black Boy Wood.
- Route 6 – St Stephen 011 Bridleway, providing a route towards Bricket Wood rail station.
- Route 7 – Station Road, providing access to Bricket Wood rail station.

The audit includes a CLoS assessment in line with the LTN1/20 guidance. Basis Active Travel Audit, a range of improvements have been identified to enhance the routes. However, post improvement assessment of CLoS is not included in the note.

Additionally, The Highway Technical Note does not include any assessment of active travel along the route from the site to the A405 active travel routes including, the St. Stephen 018 footpath.

Additionally, the document does not demonstrate the site's accessibility to various local amenities in terms of active travel.

The submitted Highway Technical Note includes drawings (on a topographical base) for the proposed 'Active' travel improvement to Lye Lane. The proposed new footway is 2m wide till the West Riding, with a permitted crossing point (near St Stephen 030 footpath). The applicant has suggested improvement measures such as

- Resurfacing of unmade sections
- Realignment of Lye Lane carriageway at selected sections
- Provisions of uncontrolled crossings
- Improved connection to recreation path (Adjacent to Woodview Lodge)
- Backfilling areas of existing ditches
- Removing tree stumps
- Provision of passing bay (Approx. 75-metres northeast of the give-way priority junction with West Riding), etc.

The drawings also identify and highlight the areas of proximity to existing trees indicating a requirement for a no-dig solution. Drainage is assumed to be achieved through a combination of drainage kerbs and natural drainage of the footways proposed surfacing. It is proposed that the drainage kerbs will drain into the existing drainage system. If the proposed drainage kerbs are not deemed suitable, for maintenance purposes, then a traditional gully discharging to a filter drain solution in place of the existing ditch. This will be further explored at the detailed design stage. The lighting arrangements are proposed using PV Cell powered lighting units (or similar) positioned every 30-metres).

A discrepancy is found in the design of the proposed footway through the existing ancient woodland, as depicted in Appendix 3 and the swept path analysis drawings (Appendix 5) of the Highway Technical Note. The feasibility of constructing the footway in the woodland area south of the M25 overbridge raises concerns. To address this, it is advised to demonstrate the viability of the footway through the ancient woodland stretch by adhering to the relevant guidelines and standards.

The drawings indicate that footway provisions may be made possible within the land under the control of the applicant or the Highway Authority. However, during the detailed design stage, should the requirement of any third-party land be identified, details of agreements to secure the use of any required land will also be needed.

### **Swept Path Assessment**

Further swept path analysis of the carriageway on Lye Lane is required to demonstrate compliance with standards. Any necessary departures from standards should be clearly stated and explained by the designer.

### **Car Parking**

The calculation of parking provision for residential developments is set out in St Alban's City District Council's Local Plan Review. Policies 39 and 40 state the parking requirements at residential developments and were retained in the July 2020 Local Plan Review. A total of 253 car parking spaces are proposed within the curtilage of the development for the proposed 109 dwelling scheme.

The Highway Authority recommend that the level of on-site car parking is limited to a maximum of one space per 1 or 2 bed dwellings and two spaces for 3+ bedrooms. This is to encourage active travel / public transport trips.

Hertfordshire County Council declared a climate emergency in 2019 and the HCC Local Transport Plan Policy 5 requires all new developments to provide EV infrastructure. The DfT's Decarbonising Transport (2021) states that in 2030 the sale of new petrol and diesel cars will cease. The NPPF paragraph 112 (e) also requires sites to enable charging. Parking provision can be addressed at the reserved matter stage.

A condition will be required to provide electric vehicle charging points for each residential dwelling.

### **Cycle Parking**

Cycle parking standards are set out in St Alban's District Council's Local Plan Review. Policy 39 Part viii states that "bicycle and motorcycle parking provision may be required for in large developments".

The Highway Authority request cycle parking is provided at a level of one long-term cycle parking space per bedroom. It should be noted that the St Alban's standards are now only considered guidance.

It is proposed that the development will provide adequate and safe cycle storage within the boundary of each dwelling.

A condition will be required to provide cycle parking at a level of one long-term cycle parking space per bedroom within the boundary of each dwelling.

### **Accessibility - Public Transport**

With regards to Highways Improvements in Association with Development, Policy 35 of the current Local Plan sets out that:

'In order to mitigate the highways effects of development proposals the District Council, in conjunction with the County Council where appropriate, will seek highways improvements and / or improvements to the public transport system from developers whose proposals would otherwise result in detrimental highway conditions.'

With regards to public transport provision, Policy 36A – Location of New Development in Relation to Public Transport Network, sets out that:

'The District Council will generally encourage the use of public transport. In considering the impact of new development, account will be taken of its proximity to the public transport network and whether facilities will be provided within the development to cater for the use of the network'.

An assessment of local public transport has been carried out and is reported in the updated TA (January 2023).

The NPPF (July 2021) sets out that opportunities to promote walking, cycling and public transport use are to be identified and pursued. Applications for development should:

- give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;

- address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.

Currently two bus routes serve Bricket Wood. The nearest bus stops are located approximately 0.4 miles to the south of the site on West Riding, at Grassington Close within the village of Bricket Wood.

How Wood rail station is located approximately 1km to the North and Bricket Wood rail station is located approximately 1km to the South. Rail services at these stations are towards St Albans Abbey or Watford Junction and typically operate at a frequency of 1 per hour in each direction. At Watford Junction, interchange is available to direct services to London Euston, southern, central and north-western England and Scotland as well as to London Overground services.

In the previous response, HCC requested further evidence of engagement with local bus operators to explore and pursue any opportunities to promote walking, cycling and public transport use. In addition, HCC requested Kassel kerbing and shelters on both sides of West Riding, to enhance the bus stop amenities and pursue the opportunity to make bus services as attractive as possible.

In the submitted Highway Technical Note, the applicant has undertaken Active Travel Audit for 7 identified routes and identified various improvements including the provision of Kassel kerbing and shelters on both sides of West Riding bus stops. It also states that an appropriately scaled proportion of these additional improvements are included as part of the 'Second Stand (S106)' contributions.

However, the Highway Technical Note does not provide evidence of engagement with the local bus operators as requested by HCC. As such, it is recommended that the applicant should also provide evidence of engagement with local bus operators to explore and pursue any opportunities to promote walking, cycling and public transport use.

### **Travel Plan**

A condition will be required to provide a robust Full Travel Plan.

### **Construction**

A Construction Traffic Management Plan will be required to ensure construction vehicles will not have a detrimental impact on the vicinity of the site and a condition will be required to provide adequate parking for construction vehicles on-site to prevent on-street conflict and impacts to the highway safety on Lye Lane.

### **Planning Obligations / Community Infrastructure Levy (CIL)**

St Albans does not currently have a CIL. In the absence of CIL, sustainable transport contributions are sought. Hertfordshire County Council's 4th Local Transport Plan (LTP4) has developed strategies and plans for the county and the towns and areas within it which identifies the sustainable transport and accessibility measures for which contributions would be sought.

For new residential developments, a contribution of £6,826 per dwelling plus SPONS indexation (£9,660 at March 2023 prices) is required. Therefore, based on the proposed development of 115 dwellings the total developer contribution to active travel would be £784,990 plus SPONS indexation (£1,110,900 at March 2023 prices).

The cost of any off-site works necessary in the immediate context of the site that have wider public benefits are considered Strand 1 (Grampian conditioned) contributions, and these can be deducted from the Strand 2 contributions. As such, the cost of any necessary and relevant local off-site

highways' works will be discounted from this total. For example, the cost of the proposed footway to the south and the requested bus stop improvements, plus any gaps identified in the required walking and cycling audit of the routes between the site and key local destinations, will be discounted from this total.

Transport Package SM20 within Hertfordshire County Council's South-West Hertfordshire Growth and Transport Plan that will be directly relevant to this location.

Transport Package SM20 is to provide an A405 Cycleway, to include provision of off-road cycleway broadly alongside the A405 running from Coningsby Bank (St Albans) and Bricket Wood (M1 J6) and connecting to existing route. Enhancing existing cycleway continuing to Garston (including the Leisure Park) and Leavesden (including the business park). This forms part of a broader strategy to make the A405 multi-modal at Bricket Wood.

### **Conclusion**

Hertfordshire County Council (HCC) as highway authority has reviewed the application submission and wishes to restrict the grant of permission until the above matters are resolved.

**Signed**  
Chris Carr

28 July 2023