



National Highways Planning Response (NHPR 22-12) Formal Recommendation to an Application for Planning Permission

From: Regional Director
Operations Directorate
South East Region
National Highways
PlanningSE@nationalhighways.co.uk

To: St. Albans City and District Council (FAO Dominic Bateman)
planning@stalbans.gov.uk

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: 5/2022/2443

Location: Bricket Wood Sports & Country Club, Paintball Site & Bricket Lodge, Lye Lane, Bricket Wood, Hertfordshire, AL2 3TF

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

National Highways Reference: 19404

Referring to the consultation on the planning application referenced above, in the vicinity of the M25 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:


- ~~a) offer no objection (see reasons at Annex A);~~
- b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);
- ~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningSE@nationalhighways.co.uk.

Signature: 	Date: 24 Mar 2023
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¹ Where relevant, further information will be provided within Annex A.

Annex A National Highways' assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We are interested in the potential impacts that the development might have on the SRN, which in the case of this proposal is the M25 carriageway in between J21A and J22, which forms a boundary to the southern side of the site.

As highlighted within the TA (Section 5.0) the proposed development will comprise 115 dwellings and generate 88 two-way vehicle trips in the AM peak hour and 84 two-way vehicle trips in the PM peak hour. With M25 J21A situated 1.5km from the site, we accept the conclusions in the TA that SRN would not receive a sizable traffic impact as a result of this development proposal.

We recently issued a holding recommendation to yourselves on 08th Dec 2022, following a review of the transport documents accompanying the planning application submission. This included a Transport Assessment (TA) dated July 2022, as prepared on behalf of the applicant by Paul Mew Associates. Whilst it was accepted that the proposals will not place a significant traffic impact on the SRN, given the position of the site on the top of an embankment that bounds the M25 carriageway, further consideration of the sites impact on drainage, embankment structure, boundary treatments, etc. needed to be checked.

Concern is raised regarding comment in the FRR indicating that any flood waters would be intercepted by the M25, which is not accepted. Notwithstanding this, a suitable worded condition could be attached to the planning permission forbidding any third-party drainage onto the M25, National Highways land or assets.

A desk top investigation of the site indicates that there are chambers to the back of the retaining wall, which may include an element of drainage. There may also be some sort of granular drainage system would have been provided at the top of slope from past records, but actual evidence of this was not found. It is therefore requested that a Construction Management Plan is conditioned to the planning approval, to include geotechnical details regarding excavation and/ or piling works, which will aid in assessing the drainage impact of the site.

In the case of this development proposal, our interests relate to M25 Junctions 21A and 22. We are interested as to whether there would be any adverse safety implications for the SRN because of this proposal. Given the above, we do not

consider the proposed development to have an unacceptable adverse impact on the SRN.

Recommended Conditions

1. The development must not allow any surface water or other drainage from the development to discharge onto or into the NH estate, drainage or otherwise.

Reason: To safeguard the operation of neighbouring facilities and the ongoing maintenance, safety and operation of the Strategic Road Network.

2. The proposed development shall be carried out in accordance with a Construction Management Plan approved by the Local Planning Authority and National Highways. The Construction Management Plan should include details of excavation or piling works relating to the drainage of the site.

Reason: To safeguard the operation of neighbouring facilities and the ongoing maintenance, safety and operation of the Strategic Road Network.

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.