



PAUL MEW ASSOCIATES
TRAFFIC CONSULTANTS 020 8780 0426

STATEMENT OF COMMON GROUND

Author:	Nicholas Peter Ferguson on Behalf of Paul Mew Associates
Date:	13th June 2024
Project:	Bricket Lodge, Lye Lane, Bricket Wood, Hertfordshire
Subject:	Statement of Common Ground on Highways Matters
Planning Ref:	5/2022/2443
Appeal Ref:	APP/B1930/W/24/3338501

INTRODUCTION

1. My name is Nicholas Peter Ferguson, and I am a Director at Paul Mew Associates Transport Consultancy with 19 years' experience in transport planning. I am a member of the Chartered Institute of Highways and Transportation (CIHT) and I hold a Bachelor of Arts honours (BA Hons) degree in Geography from the University of Plymouth.
2. Paul Mew Associates is instructed by J. K. Rudkin (Builders) Limited ('the appellant') to provide professional transport consultancy services in relation to the proposed development at the Bricket Wood Sports and Country Club, Paintball Site, and Bricket Lodge, Lye Lane, Bricket Wood, Hertfordshire, AL2 3TF ('the appeal site').
3. This Statement of Common Ground (SoCG) has been agreed between me on behalf of the appellant and Mr. Chris Carr on behalf of Hertfordshire County Council (HCC) as the local highway authority and supplements the General SoCG signed between the parties on 14th May 2024.

4. To assist the Inquiry, the purpose of the SoCG is to reduce the scope of the matters in dispute between the parties. It sets out those matters which are agreed between the parties, and which are not.



MATTERS AGREED

5. The proposed footpath on Lye Lane connecting the appeal site to West Riding in the south is essential to render the site sustainable in walking access terms.
6. The trip generation and distribution in the Transport Assessment (January 2023 Update) is acceptable.
7. The collected baseline traffic data on the roads adjoining the site is typical and therefore acceptable for the development impact assessment.
8. The background traffic growth factors applied to the baseline traffic data are validated and accepted.
9. The junction impact assessments are verified and accepted.
10. The traffic impact of the development on the local highway is acceptable in terms of highway capacity.

MATTERS NOT AGREED

11. The weight applied to paragraph 109 of the NPPF in respect to the proposed off-site highways upgrade works and provision of sustainable transport contributions.
12. The change in character and road conditions along Lye Lane to the south of the appeal site compared with those to the north.
13. That a shared walking and cycling scheme under LTN 1/20 design guidance is necessary to make the site safe and sustainable in transport terms.

- 14. That the applicant has failed to demonstrate that off-site highway improvements and public transport upgrades can be delivered or secured, specifically to render the site’s location sustainable in terms of transport.
- 15. That the proposed off-site highways works inclusive of an acceptable lighting strategy can be delivered and secured by way of a S278 Agreement.
- 16. The weight applied to HCCs draft Place and Movement Planning and Design Guidance, Part 1 Chapter 5 ‘Transport Assessment’, specifically in relation to the frequency of the bus services at the nearest bus stops to the appeal site on West Riding, and the walking distance from the appeal site to those bus stops.
- 17. That the overall sustainable transport contributions sought by HCC of up to £1,110,900 for up to 115 dwellings at March 2023 prices, planned to deliver active travel upgrades surrounding the appeal site (excluding the costs associated with the planned footpath on Lye Lane), and to fund Kassel kerbing and shelters at the nearby bus stops and towards funding of additional services, is acceptable.
- 18. That inadequate space is available at the site access junction, the Lye Lane / West Riding junction, and on the southern stretch of Lye Lane past the M25 overbridge to allow large vehicles to safely pass each other.
- 19. That insufficient information has been provided in respect of vehicle swept path analysis and a revised Stage 1 Road Safety Audit and associated Designer’s Response, to demonstrate that there would not be further harm to highway safety.

<p>Nicholas Ferguson For the Appellant</p>		<p>Chris Carr For HCC</p>	
--	---	-------------------------------	---