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

Director of Planning

Three Rivers District Council
Three Rivers House
Northway
Rickmansworth
Hertfordshire
WD3 1RL

District ref: 21/0573/FUL
HCC ref: TR/6075/2021
HCC received: 12 May 2021
Area manager: Alan Story
Case officer: Adam Whinnett

Location

Development Site, Maple Lodge, Maple Lodge Close, Maple Cross, Rickmansworth, WD3 9SN

Application type

Full Application

Proposal

Comprehensive redevelopment to provide 2 no. warehouse Class E(giii)/B2/B8 units comprising a total of 16,115 sqm including 1,882 sqm ancillary E(gi) office space, access, landscaping and associated works.

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 does not wish to restrict the grant of permission subject to the following conditions:

1. A. Highway Improvements – Offsite (Design Approval)

Notwithstanding the details indicated on the submitted drawings no on-site works above slab level shall commence until a detailed scheme for the offsite highway improvement works as indicated on drawing number MLC-BWB-GEN-XX-DR-TR-0001 S2 rev. P3 have been submitted to and approved in writing by the Local Planning Authority.

B. Highway Improvements – Offsite (Implementation / Construction)

Prior to the first use of the development hereby permitted the offsite highway improvement works referred to in Part A of this condition shall be completed in accordance with the approved details. Reason: To ensure construction of a satisfactory development and to ensure that the highway improvement works are designed to an appropriate standard in the interest of highway safety and amenity and in accordance with Policy 1, 5, 7, 8, 13 and 21 of Hertfordshire's Local Transport Plan (adopted 2018).

2. Provision of Parking & Access

Prior to the first use of the development hereby permitted the proposed access road, on-site car parking, electric vehicle charging provision, cycle parking and turning areas shall be laid out, demarcated, surfaced and drained in accordance with the approved plan and retained thereafter available for that specific use.

Reason: To ensure construction of a satisfactory development and in the interests of highway safety in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

3. Construction Management Plan

No development shall commence until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the construction of the development shall only be carried out in accordance with the approved Plan. The Construction Management Plan shall include details of:

- a. Construction vehicle numbers, type, routing;*
- b. Access arrangements to the site;*
- c. Traffic management requirements*
- d. Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas);*
- e. Siting and details of wheel washing facilities;*
- f. Cleaning of site entrances, site tracks and the adjacent public highway;*
- g. Timing of construction activities (including delivery times and removal of waste);*
- h. Provision of sufficient on-site parking prior to commencement of construction activities;*
- i. Post construction reinstatement of the working areas and/or temporary access to the highway;*

Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way in accordance with Policies 5, 12, 17 and 22 of Hertfordshire's Local Transport Plan (adopted 2018).

Planning Obligations

A Full Travel Plan would be required to be in place from first occupation until 5 years post full occupation. A £1,200 per annum (index-linked RPI March 2014) Evaluation and Support Fee would need to be secured via a Section 106 agreement towards supporting the implementation, processing and monitoring of a full travel plan including any engagement that may be needed. For further information please see the following link

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx> OR by emailing travelplans@hertfordshire.gov.uk

Highway Informatives

Hertfordshire County Council (HCC) recommends inclusion of the following highway informative / advisory note (AN) to ensure that any works within the public highway are carried out in accordance with the provisions of the Highway Act 1980:

AN) Construction standards for works within the highway (s278 works):

The applicant is advised that in order to comply with this permission it will be necessary for the developer of the site to enter into an agreement with Hertfordshire County Council as Highway Authority under Section 278 of the Highways Act 1980 to ensure the satisfactory completion of the necessary off-site highway improvements. The construction of such works must be undertaken to the satisfaction and specification of the Highway Authority, and by a contractor who is authorised to work in the public highway. Before works commence the applicant will need to apply to the Highway Authority to obtain their permission and requirements. Further information is available via the website: <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>

Comments / Analysis

1. Introduction

The application comprises of the construction of two warehouse units with office space, access and associated works at a development site at the north eastern side of Maple Cross village. The site is currently unoccupied and the land is zoned as an allocated employment site as part of Three Rivers District Council (TRDC)'s Local Plan.

A previous application for the site for a development of two warehouse units class B1c/B2/B8 (planning ref. 19/1179/FUL) was refused planning permission in November 2019, the decision of which was upheld at appeal in relation to piling and ground water. HCC as Highway Authority did not object to the application subject to recommended conditions, off-site highway works and a Section 106 planning obligation towards a full travel plan.

A Transport Assessment (TA), Framework Travel Plan (FTP) and Construction Logistics Management Plan (CLMP) have been submitted as part of the application documents. The TA has been updated from the previous application taking into consideration both the original TA and TA Addendum.

Following consideration of the permitted hotel development located on the corner of the Denham Way / private access road (which was granted planning permission in 2008 and then subsequently confirmed in 2018 through the issuing of the Certificate of Lawfulness as part of application 18/1424/CLPD), HCC as HA requested (on 07/04/2021) the following information to be provided and submitted by the applicant including:

- Trip generation assessment for a hotel of the permitted size for both the AM and PM peak;
- Updated Linsig model and results for the proposed signalised junction at Denham Way / Private Access road, factoring in the additional predicted trips from the hotel site.

It is acknowledged by HCC as HA that no trip generation was submitted as part of the original planning application for the hotel in 2007 (07/1401/FUL) nor requested by the HA at that time. Nevertheless due to the original planning permission being granted 14 years ago, it was requested to enable a robust assessment of the proposed signalised junction in the context of the current application (21/0573/FUL), other committed developments and the permitted hotel. In the absence of the HA being consulted on the Certificate of Lawfulness in 2018, this Authority was unaware that the 2007 consent was considered committed. The HA does recognise that the TA for 21/0573/FUL has acknowledged the hotel development, but that it has failed to provide any traffic generation associated.

An additional Transport Note (TN) dated 07/05/2021 has subsequently been submitted by BWB Consulting (on behalf of the applicant) in response to the request for this additional information and this response refers to both the original TA and the supplemental TN.

2. Existing Highway Network and Access

The site is approximately 1.5km from junction 17 of the M25 . The site is approximately 220m from its north-eastern corner to the highway on Denham Way and accessed via a priority T-junction with Denham Way (with a right turn lane provided for vehicles turning into the private road when travelling north along Denham Way) and then a private access road. Denham Way is a single-carriageway road and designated as a classified A (A412) main distributor road, subject to a speed limit of 40mph within the vicinity of the junction and is highway maintainable at public expense. There is a shared

cycleway/footway on the eastern side of Denham Way; a pedestrian only footway on the western side and a signal controlled pedestrian crossing approximately 40m south of the T-junction.

There is a pedestrian footway on the south side of the private access road leading to the site, which is not part of the highway. On previous site visits it has been observed that vehicles are regularly parked on much of the length of the private footway.

The site can also be accessed via Maple Lodge Close, which is a private road and not highway maintainable at public expense. However this route is not suitable to provide vehicle access to the development site and HCC as Highway Authority would therefore request details as to how vehicles accessing the proposed use would be restricted from using Maple Lodge Close, although this would not be something that the Highway Authority would be able to enforce due to the private nature of the road.

3. Trip / Traffic Generation

a. Existing Trip Generation – application site

As the application site is currently unoccupied, the applicant has not provided any existing trip generation for the proposed development site, which is considered to be acceptable.

b. Trip / Traffic Generation for the Proposed Use

The TRICs (Trip Rate Information Computer System) database has been used to determine the anticipated traffic levels (including vehicle trip rates) for the proposed use (and is included as part of the submitted TA).

- **Pre-application Scoping Note – B8 Trip Generation**

The applicant developed a Scoping Note (copy in Appendix 2 of the TA) subject to and agreed as part of pre-application discussions with HCC as HA in November /December 2018, which outlines the anticipated trip generation of the proposed development site based on a GFA of 15,500 sqm and a B8 land use. The applicant has stated that to be robust in their approach, they applied the 85th percentile trip rate from the survey sites selected in TRICs to the GFA of the proposed development.

It is also noted that the TRICs reports are dated 2017 and are therefore 4 years old. An interrogation of TRICs shows that there are new surveys and on this basis the TRICs reports would normally need to be updated as there are new sites in TRICs to be considered and the search should exclude Greater London (the current submitted TA states that “all sites in Greater London....have been deselected” although this is not the case according to the submitted data). However HCC have undertaken their own TRICs interrogation to corroborate the results and the 85th percentile AM and PM peak hour trip rates are the same in HCC’s interrogation as those presented in the TA and are as follows:

AM Peak:

- *Vehicle driver (per 100sqm): 0.634 arrivals, 0.083 departures resulting in 0.717 two-way trips*
- *Vehicle driver (15,500 sqm): 98 arrivals, 13 departures resulting in 111 two-way trips*

PM Peak:

- *Vehicle driver (per 100sqm): 0.055 arrivals, 0.607 departures resulting in 0.662 two-way trips*
- *Vehicle driver (15,500 sqm): 9 arrivals, 94 departures resulting in 103 two-way trips.*

- **Full Application - Site Trip Generation**

The applicant has used the same trip rates used by the original scoping note to calculate trip generation for the actual gross floor area of the current proposals of 16,570sqm. As previously noted, the applicant has used sites within Greater London and surveys conducted prior to

September 2017 to derive the original trip rates. This is considered to be acceptable due to the use of 85th percentile AM and PM peak hour trip rates, as opposed to the average trip rate. For reference, the TRICs parameters, peak hour trip rates and anticipated trip generation for a 16,570 sqm floor area are as follows:

AM Peak:

- *Vehicle trips (per 100sqm): 0.634 arrivals, 0.083 departures resulting in 0.717 two-way trips*
- *Vehicle trips (16,570 sqm): 105 arrivals, 14 departures resulting in 119 two-way trips*

PM Peak:

- *Vehicle driver (per 100sqm): 0.055 arrivals, 0.607 departures resulting in 0.662 two-way trips*
- *Vehicle trips (16,570 sqm): 9 arrivals, 101 departures resulting in 110 two-way trips*

The proposals have been predicted as generating upto 695 daily two way trips with 119 two-way trips in the AM peak (0800-0900) and 110 two-way trips in the PM peak (1700-1800) as summarised in table 5 of the TA. None of these figures need to be doubled as they are a total of both arrivals and departures. The peak hours assessment period was previously agreed by both HCC and Highways England.

The methodology used is considered robust and the results have been verified in TRICs by HCC as HA. The actual figure would most likely be lower due to the use of the 85th percentile rather than the mean, which provide a lower figure. The TA (and the methods within) would therefore be the normal method under which the trip generation would be robustly reviewed and assessed and the HA would not have an objection to the methods used as per the previous application also (planning ref. 19/1179/FUL). HCC as HA does not endorse, support or consider the vehicle movements from schedule 19/0333/SCH1 of the submitted Planning Noise Assessment as being appropriate, and is not borne out by the predictions in TRICs.

- Proposed Hotel Trip / Traffic Generation

The TRICs database has been used to determine the predicted vehicle trip rates for the permitted hotel. The use of TRICs is the normal method under which the trip generation would be reviewed and assessed and therefore HCC as HA would not have an objection to the methods used in this respect.

The details of the methods used for the hotel development are summarised in section 3 of the submitted TN, including the criteria used and justification for the site selection. A full copy of the Hotel TRICs extracts is included in Appendix 2 of the TN.

TRICs selected four sites based on the appropriate criteria, of which one has been focused on for comparison. For reference, the TRICs parameters, peak hour vehicular trip rates and anticipated trip/traffic generation for the hotel is:

AM Peak (0800-0900):

- *Vehicle trip rate (per 100sqm): 0.499 arrivals, 0.380 departures resulting in 0.879 two-way trips.*
- ***Total Vehicle trips (total based on number of bedrooms): 103 arrivals, 79 departures resulting in 182 two-way trips.***
- *Total Vehicle trips (based on GFA of 13,289sqm): 66 arrivals, 50 departures resulting in 116 two-way trips.*

PM Peak (1700-1800):

- *Vehicle trip rate (per 100sqm): 0.153 arrivals, 0.374 departures resulting in 0.527 two-way trips.*
- ***Total Vehicle trips (total based on number of bedrooms): 32 arrivals, 77 departures resulting in 109 two-way trips.***
- *Total Vehicle trips (based on GFA of 13,289sqm): 20 arrivals, 50 departures resulting in 70 two-way trips.*

NOTE: THE VEHICLE TRIP FIGURES ABOVE ARE PER 100SQM BUT HAVE BEEN USED TO CALCULATE AGAINST THE NUMBER OF TOTAL BEDROOMS WHICH ACTUALLY PROVIDES A HIGHER TOTAL NUMBER OF TRIPS THAN IF USED AGAINST A TOTAL SIZE OF 13,289M2.

HCC as HA would normally ask for more than one site for comparison. Nevertheless following the justification for the site selection (sections 3.2 to 3.5 of the TN), in addition to an independent corroboration of the results in TRICs by HCC as HA, the methodology used and site selection is considered robust and acceptable.

Indeed the use of the one site results in a larger trip generation than that of the mean value of comparable sites and the use of trip rate per 100m² (multiplied by the number of bedrooms, which is what has been calculated above) forecasts a larger vehicle trip rate therefore worst case scenario. The vehicular trip rates used (GFA trip rate multiplied by bedrooms) are therefore considered robust in order for a full assessment of the impact on the surrounding highway network and proposed junction to be made.

4. Impact on the Surrounding Highway Network and Junction Modelling

a. Baseline Traffic Data

Baseline traffic flow data is used (which is actual recorded data not assumed) for existing traffic flows and the directional distribution of these flows on the surrounding highway network. The parameters for the necessary area, scope and duration of baseline traffic data was agreed between HCC as HA, Highways England and the applicant at the pre-application stage. As part of the assessment of the TA, the HA evaluates whether or not the baseline data used is sufficient and in accordance with any previous pre-app discussions. The HA also uses any of its own available traffic model data, recorded traffic flow data and accident data to assess and verify any submitted data in addition to identifying any known capacity or safety issues on the surrounding highway network.

The baseline data used for this application includes manual classified counts and existing baseline surveys from other sources (including data recorded and held by HCC as HA) and is detailed in section 3.12 to 3.14 and appendix 3 of the submitted TA. This baseline data would include existing traffic flows on the surrounding highway network including traffic from the Thames Water site; Hertford Place, Woodoaks Farm and any other existing uses.

Growth factors have then been used (as outlined in sections 6.6 to 6.7 of the TA) to determine suitable future growth rates for the recorded baseline traffic flows i.e. take into consideration any predicted future increase in the levels of traffic on the highway network. For this application future assessment years of 2022 and 2031 have been used and therefore the HA has assessed the acceptability of the proposals in the context of the baseline data and future assessment years to ensure a robust assessment of the any impacts.

The baseline data, assessment years and growth factors used in respect of this application are considered sufficient and acceptable.

b. Traffic Distribution / Directional Flow

In respect of the flow of traffic to and from the site, the application has not assumed that all traffic would access the application site via the M25. The submitted TA and subsequent TN take into consideration that a proportion of development traffic would access the site via the A412 to and from the south and the junction modelling included in the TA and TN reflect this. For example, the traffic flows in the TA show between 23% and 27% of development traffic would turn left in the peak hours when exiting onto the A412 (i.e. the direction of Maple Cross and not the M25). Furthermore the submitted TN shows that the baseline traffic flows + committed development (including the hotel) +

proposed development + 2031 growth factors show a percentage flow of traffic from the south-west to and from the private access road (i.e. the direction of Maple Cross and not the M25) of between 20% to 26% for the AM and PM peak hours, which is consistent with this (refer to figure 5 and 6 of the TN for figures).

This is considered to be reasonable and robust when taking into consideration: that the 2031 model incorporates baseline (i.e. actual measured flows) in addition to the committed and proposed development; the status of Denham Way as part of the A road network and the close proximity of the site to the M25.

c. Junction Modelling

An assumed opening year (2022) and 2031 assessment of the local highway network have been completed as part of the TA and subsequent TN, which is an acceptable scope to assess the current and future impacts of the development on the surrounding highway network. PICADY (for priority junctions), ARCADY (for roundabouts) and LinSig (for traffic signalized junctions) model assessments have been prepared for the A412 / private site access road t-junction; M25 J17 and Maple Cross roundabouts and included as part of the TA. The junctions have been modelled using baseline traffic data, committed developments (including HS2 and the Reach Free School) TEMPRO growth factors and the above TRICs vehicle trip rates. The models take into consideration the actual features and constraints of a junction and therefore reflect how existing junctions work and how any design proposals would operate if implemented .

The model results for the Maple Cross roundabout and M25 J17 illustrate that the junctions would continue to operate within capacity in 2031 (including committed development) and are therefore considered acceptable by HCC as HA. A LinSig model has been used to assess the performance of the existing signalised Chalfont Road / Denham Way / Maple Lodge Close junction and the results in the submitted TA (sections 7.22 to 7.27) show that the junction works within capacity.

Highways England would also need to be satisfied with the modelling approach and results, specifically for the M25 junction.

A Junctions 9 PICADY assessment has been included in both the TA and the TN to assess the operation of the existing A412 / site access road ghost island priority-controlled junction, which would provide access to both the consented hotel and the proposed warehouse development. The results identify significant capacity issues when using the current layout of the junction. Consequently, off-site highway works at this junction have previously been deemed necessary for the proposed warehouse development (and agreed in principle) and would have the additional benefit of improving the access arrangements for the permitted hotel. Further details on the proposed off-site highway works are included in section 5a of this response.

A LinSig model assessment has been carried out to assess the performance and functioning of the proposed signalization of the A412/site access junction, which is part of the proposed off-site highway works (the full results of which can be found in Appendix 5 of the TN). The proposed signalized junction has been modelled using baseline traffic data + committed developments (including HS2, the Reach Free School and hotel) TEMPRO growth factors to 2031 and the above TRICs vehicle trip rates in the AM and PM peak.

HCC as HA has reviewed the LinSig modelling methods used in the TN, the approach of which reflects the 2031 trip rates and proposed highway junction layout. The methods used would be the standard way of presenting and assessing a proposed signalized junction and are therefore considered acceptable in this respect. The results of the LinSig modelling for all lanes/links of the proposed signalized junction show that the Degree of Saturation (DoS) (which is defined as the ratio of flow to capacity for a lane) is acceptable (at a level of below the recommended 90% for all

arms/lanes) and the Practical Reserve Capacity (PCR) (which is a measure of the degree of spare capacity / degree of overload at the arm/lane with the worst DoS) is within capacity . Furthermore the predicted mean maximum queue levels on the highway would not be deemed to have a severe impact on the nearest junctions in either direction.

d. Modelling - conclusion

From a highways and transport perspective, HCC as HA has assessed and reviewed the capacity and modelling results from the proposals in the context of paragraph 109, National Planning Policy Framework (NPPF) (update 2019), which states that: "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe". In this context and in conjunction with a review of traffic flows using the HA's COMET model, the application and above model results have demonstrated that there would not a severe impact on the road network including when assessing the cumulative impact of baseline traffic data + committed developments (including HS2, the Reach Free School and hotel) + TEMPRO growth factors to 2031 + the development in the AM and PM peak. Furthermore the site is an allocated employment site in TRDC's Local Plan and the A412 form part of A road network. Therefore the number of additional trips from the application site itself onto the A road would not be considered to be severe in this context.

NOTE: COMET is a multimodal transport model, developed by HCC using Department for Transport guidance. It is able to predict changes in travel demand for vehicles, buses and rail. It currently covers all A, B, main C roads and some key 'rat runs' in residential areas. The model was built to represent typical weekday conditions in the AM peak (8–9am) Inter peak (an average hour between 10am–4pm) and PM peak (5–6pm), with the current base year representing 2014 and the main forecast year corresponding to 2036.

5. Proposed Access and Off-site Highway Works

The proposals include extending the existing private access road to run along the full front of the site in addition to a new footway on the western/development side of carriageway. There are three proposed vehicle entrances / exits from the private road providing access to three separate car parks fronting the two warehouses. The general layout is shown on submitted drawing no. 17019-C4P-AV-00-DR-A-0500 P16.

The proposed access arrangements including details of kerb radii, visibility splays and widths are shown on submitted plan numbers MLC-BWB-GEN-XX-DR-TR-100 S2 rev. P5 and MLC-BWB-GEN-XX-DR-TR-101 rev. P5 and described in section 5.4 of the Transport Assessment. Following assessment and review of the proposals, the access arrangements on the proposed access road and within the site are considered to be acceptable and in accordance with Roads in Hertfordshire: Highway Design Guide and MfS.

Vehicle tracking / swept path analysis has been included as part of the submitted TA (drawing number MLC-BWB-GEN-XX-DR-TR-110 rev. P5). The details are considered to be sufficient to illustrate that an HGV could safely manoeuvre into and out of the site accesses in addition to a car moving in and out of the car park only access.

It is unlikely that HCC as Highway Authority would agree to adopt the new and existing industrial access roads if they were ever offered for dedication as the proposals would not demonstrate a utility to the wider public as outlined in Roads in Hertfordshire (Sec. 3, 12.3). The developer would need to put in place a permanent arrangement for long term maintenance and the road name plate would need to indicate that it is a private road.

a. Off-site Highway Mitigation Works

The proposed off-site highway mitigation works are shown on drawing number

MLC-BWB-GEN-XX-DR-TR-0001 S2 P3 and summarised in section 8.4 of the TA. The proposed works, which include the signalization of the junction of Denham Way (A412) with the private access road, would be necessary to mitigate the impacts from the proposal and enable traffic generated by the proposals to egress safely from and onto the highway work (as indicated by the capacity issues identified in sections 7.11 to 7.14 of the TA and sections 5.1 to 5.3 of the TN) . The measures would also be necessary to provide a safe crossing point for pedestrians and cyclists across Denham Way and across the mouth of the entrance to the private access road to ensure that the proposals are in accordance with Hertfordshire's Local Transport Plan (LTP4) and the NPPF (paragraphs 102 and 108 to 110) . A LinSig model for the proposed signalised junction has been included in the TN illustrating that the proposed highway scheme operates within capacity at 2031, the details of which are considered acceptable by HCC as HA (and detailed earlier in section 4c of this response).

The applicant would need to enter into a Section 278 Agreement with HCC as HA in relation to the design and implementation of the necessary off-site highway works. The highway design would be subject to a detailed review and road safety audits as part of the Section 278 agreement process and would include the following works:

- The signalization of the junction of Denham Way (A412) and the private access road including the associated carriageway widening, additional filter lanes and any associated works at the junction and to/from the Maple Cross roundabout;
- The provision of signalized crossings points for pedestrians and cyclists (across Denham Way and one across the mouth / entrance of the private access road) to replace the existing pedestrian signalized crossing on Denham Way;
- The relocation of the two bus stops with easy access kerbing, shelters and real-time bus information display screens.

A Stage One Road Safety Audit for the proposed highway works would be required to be submitted as part of the initial 278 application.

Please also refer to the recommended conditions 1 and 2 and the suggested highway informative. Please refer to section 7 of this response in relation to more details of the proposed off-site highway works in the context of pedestrian and cycling accessibility and safety.

6. Car Parking Level and Design

The proposals include the provision of 142 car parking spaces and 38 HGV parking spaces – split over the two proposed units, the layout of which is shown on submitted plan no. 17019-C4P-AV-00-DR-A-0500. The area directly to the north and east of the site is located in accessibility zone 3 as documented in Three Rivers District Council's (TRDC) Development Management Policies: Local Development Document, although the site itself is not within the zone 3 area and on the edge of an urban area. The levels of car parking have been based on guidance for zone type 3, which states that the car parking levels may be adjusted to 50-75% of the indicative demand-based standard.

Following consideration of the use class, location and details submitted in Section 5.5 to 5.9 of the Transport Assessment, HCC as HA would not have an objection to the overall level of parking and the layout is acceptable and in accordance with MfS. All vehicles would be able to access the site, turn around and egress to the network in forward gear. Nevertheless TRDC as the planning and parking authority would ultimately need to be satisfied with the overall level of car parking.

The TA (sec. 5.14) states that 20% of all car parking spaces would have provision for active electric vehicle charging (EVC) whilst a further 20 to 30% of spaces would have passive EVC provision. HCC as Highway Authority would be supportive of this to ensure that the development is in accordance with LTP4 and HCC'S Sustainability Strategy.

7. Accessibility & Sustainability

The site is located on the north-east side of Maple Cross within approximately 1.2km of the whole of the settlement. The settlement edge of Rickmansworth is approximately 800m north of the site and the town centre (and train station) approximately 3.5km north-east of the site.

The site is therefore within an acceptable cycling and walking distance from the rest of Maple Cross and parts of Rickmansworth. There is footway and cycleway provision along Denham Way south into Maple Cross and north in Rickmansworth although parts of the shared foot/cycle way could be widened and improved to maximise pedestrian and cycling accessibility. HCC as Highway Authority would however recommend that measures are explored to ensure that the existing (and new extended) footway on the private access road is kept free of car parking – this would require discussion with the land owners of the existing private access road.

The nearest bus stops are located on Denham Way between approximately 350m and 550m from the development site. This is greater than the normally recommended 400m walking distance from some parts of the site. The bus stops are also proposed to be relocated slightly further north along Denham Way as part of the signalisation of the access junction. Nevertheless this is acceptable when taking into consideration the proposed improvements to pedestrian and cycling accessibility at the junction and walking distances still within an acceptable level.

The proposals include the provision of 57 cycle parking spaces, which is considered acceptable at this stage. The recommended levels for cycle parking are normally based on the number of full time staff members, the details of which are not yet known for the application site at this stage of the application. HCC as Highway Authority would recommend that the level of cycle parking is increased accordingly dependent on the number of potential staff members (and should be considered as part of the necessary Travel Plan – referred to later in this section). This is to ensure that cycling is encouraged and maximised as a form of sustainable travel for staff members and visitors to and from the site and to ensure that the development is in accordance with NPPF and LTP4.

National Cycle Route 6 is located approximately 1km from the site by bike (accessed via Denham Way, Uxbridge Road and Springwell Lane), which therefore demonstrates that the wider cycle network could be utilised as a form of travel to and from the site, particularly for any future employees.

There have been some concerns from local residents that the number of vehicles associated with the development would detrimentally impact on the safety of the surrounding highway network in Maple Cross, specifically for pedestrians. The proposed signalised junction and associated improvements to pedestrian and cycling accessibility / safety have previously been requested by HCC as HA and agreed in principle as part of the pre-application discussions to take into consideration and mitigate any adverse impacts from the proposals and to ensure that the proposals are acceptable from a highways and transport perspective, specifically in relation to access for pedestrians and cyclists (to be in accordance with LTP4 policies: 1: Transport User Hierarchy; 5: Development Management; 7: Active Travel – Walking and 8: Active Travel – Cycling and the NPPF para. 102, 108, 110). In this context the proposed highway works would improve the accessibility and safety for pedestrians and cyclists travelling between Maple Cross and Rickmansworth (including to and from the Reach Free School) and therefore onto and from the wider highway network.

a. Planning Obligations – Travel Plan

TRDC has adopted the Community Infrastructure Levy (CIL) and therefore contributions towards local transport schemes as outlined in the South West Herts Growth & Transport Plan would be sought via CIL in appropriate.

A Framework TP has been submitted as part of the application and is considered to be generally acceptable at this stage of the application/ development. Nevertheless the following amendments would be required to be submitted in an amended FTP prior to occupation:

- Local Policy Context should include LTP4 strategy.
- A statement of senior commitment is required within the FTP stating that developers/ businesses are committed to implementing the travel plan.
- Freight and delivery measures should be included with the TP if appropriate.
- If the employment figures are low, it is recommended to consider car park management as an oversupply of parking spaces may encourage car use.
- Staff surveys should be collected annually.
- Multi modal surveys should be carried out every other year (in years 1, 3 and 5 of travel plan monitoring).
- It should be noted in the FTP that annual monitoring reports should/ will be shared with HCC at least 3 months after completion.

Following consideration of the size and nature of the development, developer contributions of £6000 (£1,200 per annum for a five year period and index linked RPI from March 2014) are sought via a Section 106 Agreement towards supporting the implementation, processing and monitoring of the FTP including any engagement that may be needed. For further information please see the following link

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx> OR by emailing travelplan@hertfordshire.gov.uk

The request for a financial contribution via a planning obligation under section 106 (Town and Country Planning Act 1990) for a travel plan meets the 3 tests as outlined in regulation 122(2) of The Community Infrastructure Levy Regulations 2010 as follows:

a) it is necessary to make the development acceptable in planning terms because travel plans are a necessary tool in ensuring that sustainable travel modes are encouraged, promoted and regulated to be in accordance with the NPPF and LTP4. NPPF states that “all developments that will generate significant amounts of movement should be required to provide a Travel Plan”. The securing of a travel plan via a planning obligation allows for a greater level of detail to be agreed than could reasonably be achieved by a planning condition particularly in relation to the implementation and monitoring of the plan.

b) it is directly related to the development because the travel plan would provide a long-term management strategy for the site and its proposed use as an employment site. The travel plan would support the need to secure specific objectives, targets and commitments (including details of survey methods, funding and any required third party engagement) and be required to address the transport impacts generated by: employees commuting to and from the site; visitor movements and freight/delivery movements.

c) it is fairly and reasonably related in scale and kind to the development because the development proposals meet the thresholds for requiring a full travel plan and its associated level of financial contribution as laid out in Hertfordshire County Council’s Travel Plan Guidance (TPG, 2020), which is a supporting document to LTP4. A planning obligation is “the only mechanism to secure Travel Plan Evaluation and Support Contributions, that allow for the Travel Plan to be supported by the County Council for a minimum period of 5 years” TPG, 2020.

The monitoring and enforcement of travel plans is not a statutory function of HCC and therefore it is justified to request a reasonable level of contribution to support this. Section 93 of the Local Government Act 2003 gives the power to local authorities to charge for discretionary services. These

are services that an authority has the power for, but not the duty to, provide.

8. Construction Logistics Management Plan

The general details submitted in the plan are considered to be acceptable by HCC as HA. Nevertheless the applicant would be required to submit a full Construction Management Plan with more specific information (as detailed in the enclosed recommended condition). The details would need to be approved in writing by the planning and highway authority prior to the commencement of any works on site.

9. Conclusion

In the context of the NPPF and LTP4 and following assessment of the submitted TA and TN as detailed in the above points, there would not be an unacceptable highway safety reason nor a severe road network reason to justify the recommendation of refusal of the proposals from a highways or transport perspective by HCC as HA. Nevertheless the acceptability of the proposals would be subject to the full technical approval and completion of the necessary off-site highway work and inclusion of the above recommended highway conditions, 106 obligations and highway informatives.

Signed

Adam Whinnett

8 June 2021