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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: 25/1020/OUT  
HCC ref: TR/25536/2025  
HCC received: 10 September 2025  
Area manager: Alan Story  
Case officer: Graham Burrell

### Location

Land East Of Oxhey Lane, Oxhey Lane, Carpenders Park

### Application type

Outline

### Proposal

AMENDED PROPOSAL

Outline planning application for up to 256 homes (C3 use class) (including affordable and self/custom build housing), housing with care (C2 use class), a children's home (for looked after children) (C2 use class) together with associated access (including off-site highway works), parking, open space and landscaping (appearance, layout, landscaping and scale as reserved matters)

### 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:

### REASONS AND COMMENTS

HCC highway comments were provided on 6 August 2025. It was recommended that planning permission be refused. The reasons were summarised as follows:

"i. No audit has been provided on the quality of cycling and walking routes in the vicinity of the proposed development. The sustainability of the proposal has therefore not been properly evaluated. This is considered contrary to paragraphs 109-118 of the NPPF and Policies 1, 5, 6, 7 and 8 of Hertfordshire's Local Transport Plan, 2018.

- ii. The lack of bus services in the vicinity of the site has not been addressed. This further questions the sustainability of the proposal. This is considered contrary to paragraphs 109-118 of the NPPF and Policies 1, 5, 6, 7, 8 and 9 of Hertfordshire's Local Transport Plan, 2018.
- iii. Trip generation, distribution and assignments provided in the TA are not acceptable. This is considered contrary to paragraph 118 of the NPPF which requires a vision-led transport assessment so that the likely impacts of the proposal can be assessed and monitored.
- iv. No safety audit (or Designer's Response) has been provided in respect to the two proposed new accesses. This is considered contrary to paragraph 118 of the NPPF which requires a vision-led transport assessment so that the likely impacts of the proposal can be assessed and monitored.
- v. No assessment has been made on the impact of the development on street trees. This is considered contrary to paragraph 118 of the NPPF which requires a vision-led transport assessment so that the likely impacts of the proposal can be assessed and monitored.
- vi. The TA does not provide a gradient profile for the proposed new road onto the A4008. This is considered contrary to paragraph 118 of the NPPF which requires a vision-led transport assessment so that the likely impacts of the proposal can be assessed and monitored.
- vii. Visibility splays from the junction are not provided in the TA. This is considered contrary to paragraph 118 of the NPPF which requires a vision-led transport assessment so that the likely impacts of the proposal can be assessed and monitored.
- viii. The proposed access onto the A4008 is considered contrary to policy 5(f) of HCC's Local Transport Plan, 2018."

A "Response to HCC Comments" dated 9 September 2025 has now been received. This is referred to as the "Response document" below. Comments are provided below on each point raised.

#### **i. Audit of walking and cycling routes**

The Response document notes that the TA provided "an overview of the walking and cycling routes between the site and local facilities" and now provides in Appendix B "a more detailed walking and cycling audit."

The audit examines three routes:

Route 1 – To St. Meryl School & Little hearts pre-school

Route 2 – To bus stops on By The Wood

Route 3 – To Carpenters Park station and South Oxhey local centre

The results of the audit suggest potential improvements which include:

- Installation of tactile paving at uncontrolled crossing points along Carpenters Avenue, Foxleys, The Mead and Gibbs Couch.
- Footway widening into existing grass verges on Oxhey Lane to ensure that the footways are wide enough to walk two side-by-side.
- Resurface existing footways on Oxhey Lane and Carpenters Avenue to improve accessibility and comfort.

The Response document however refers to making a contribution to “support necessary active travel improvements through a Section 106 contribution”. This is not accepted. If potential improvements identified in the audit are considered “necessary” to support the development they should be secured against any planning approval as a “Strand 1 obligation” by way of an appropriate planning condition.

The applicant states that it would welcome the opportunity to discuss improvements with HCC. This appears to be a useful way forward. HCC would welcome a meeting with the applicant and the LPA.

## **ii. Lack of bus services**

The TA claimed a unique status for this site stating (in paragraph 6.4.1) that “the excellent public transport connections are of a different character to sites outside Greater London”. HCC comments noted that the nearest train station was in excess of 800 metres from the site. It was also noted that there are no bus services available within 400 metres (contrary to Part 1, Chapter 5, paragraph 7.9 of Hertfordshire’s Place & Movement Planning Design Guidance). Specifically, the train station is approximately 1050 metres from the proposed entrance to the site and the nearest bus stops are at about 700 metres away. HCC highway comments therefore challenged the applicant’s consideration of the site as having “excellent public transport connections”.

In respect to bus services, the Response document states that “It is acknowledged that there are opportunities to uplift the level of bus accessibility in the local area, and that a service to complement the existing number 328 service may be beneficial for future residents of the site”.

HCC’s public transport team propose a new service - to complement Service 328 - from South Oxhey to Watford, and extending it to the new site. This new service would operate from the site via A4008 and B4542 down to Prestwick Road, then via a variation of the current 328 route into Watford. There would be the option of extending this up to Watford Junction. An hourly service should be achievable with two vehicles, at an estimated annual cost of £350k.

HCC is therefore seeking an index-linked Strand 1 financial contribution of £350k per annum for a period of five years totalling £1,750k. This would need to be secured by a Section 106 agreement.

In addition, provision would be required for new bus stop infrastructure. HCC’s public transport team has identified a need for a pair of new stops outside the site to support the potential new service and future proof the site. These would serve both new residents and the nearby care home. They suggest a location between the islands along Oxhey Lane to facilitate safe crossing. It would be useful if the applicant could look at their potential placement by way of a plan. They note the infrastructure that would be sited at each bus stop as follows:

1. **Carpenders Park, Oxhey Lane, Carpenders Avenue**
  - Kassel kerb
  - Bench (*Gladstones*)
  - RTI bus stop pole with RTI screen (*Journeo*)
  - Bus cage
2. **Carpenders Park, Oxhey Lane, opp Carpenders Avenue**
  - Kassel kerb
  - Bench (*Gladstones*)
  - RTI bus stop pole with RTI screen (*Journeo*)
  - Bus cage

To address accessibility, minor improvements are also recommended at the two existing bus stops below:

1. **Carpenders Park, By the Wood, Upper Hitch (21803900)**
  - Kassel kerb required.
2. **Carpenders Park, By the Wood, opposite Upper Hitch (21802940)**
  - Kassel kerb required.

HCC would also seek to secure the bus stop infrastructure proposals detailed above by way of planning condition.

### iii. Trip impact assessment

The TA stated that “Multi-modal trip rates have not been directly obtained from the industry standard TRICS database. This is because the site is unique in that it is not within the Greater London boundary, yet it has access to a regular London Overground service linking it to key destinations within Central London and Watford. There are very few sites within TRICS database with similar characteristics, and therefore a representative level of multi-modal trip rates may not be obtained from any multi-modal TRICS outputs.” And further noted “the excellent public transport connections.”

This was refuted in HCC’s comments dated 6 August 2025, which stated that:

“The TA goes further in its claim for the unique status of this site stating (in paragraph 6.4.1) that “the excellent public transport connections are of a different character to sites outside Greater London requiring bespoke multi-modal trip rates for this site.” The suggestion of “excellent public transport connections” is not though established in the TA. The railway station at 1km from the site entrance is in excess of 800 metres, a distance often defined as the distance for a “Walkable Neighbourhood”.

Bus services are currently not available within the 400 metres detailed in HCC’s P&MPDG. It is difficult to see how the applicant considers the site to have “excellent public transport connections”.

Reference to “excellent public transport” is often aligned to a PTAL rating of 6. If the applicant is making this specific claim, evidence should be provided to support this.”

The Response document does not seek to support the previously stated “excellent public transport” by means of an established assessment methodology. As noted in previous HCC comments the site would not be considered by HCC to have excellent public transport connectivity. Rather, there is a need to consider necessary public transport improvements as detailed under "Bus services" above.

In respect to trip impact assessment, paragraph 4.1.7 of the Response document states that “the multi-modal TRICS data in Table 4.1 has been used to assess the level of trips arising from the proposed development.” Paragraph 4.1.5 of the Response document notes that the TRICS assessment has been updated due to an update being available from TRICS. The residential sites chosen in the updated list are detailed in Appendix D of the Response document. This lists 22 sites all at “Edge of Town” locations. “Edge of Town” appears to be an appropriate location indicator. For the Housing with care and childrens’ home, Table 4.5 in the Response document reproduces Table 6.8 in the TA. Table 4.6 of the Response document shows the total peak hour vehicle flow based on the TRICS assessment.

The Distribution and Assignment detailed in the TA was also questioned by HCC. A simpler “hyper-local” assessment of trip distribution was suggested by HCC to act as - at least - a comparator to the figures derived in the TA. This has been presented in paragraph 4.2.4 of the Response documents and shows fairly close correlation to the previous distribution – reproduced in paragraph 4.2.3 of the Response document. Paragraph 4.2.7 notes that the “distribution of development traffic has been updated to reflect these changes and has been subsequently fed into an updated set of operational assessments.”

The revised trip matrices have been applied to the LINSIG model used in the initial assessment. The outputs are summarised in Table 4.9 (without vision) and Table 4.10 (with vision).

The results of the modelling show that all arms operate within capacity – well below a “Degree of Saturation” of 90% which would signify that the junction was nearing capacity. The results of the modelling are considered acceptable.

#### **iv. Safety audit**

The Response document provides a Stage 1 road safety audit and a Designer’s Response. Ten “Problems” are identified. HCC’s road safety team have been requested to review the documentation. It is expected that their examination will be completed shortly. Further comments will then be provided.

#### **v. Trees**

The Response documents states “HCC identified a mature oak tree to the north of the proposed site access location. This is identified as T1 in the Tree Protection Plan provided by ACD Environmental Ltd along with the Root Protection Area (RPA) of the tree. The plan was submitted with the application along with an Arboricultural Impact Assessment. ACD have reviewed the site access against the access design and identified the footway would lead to 2.22% incursion into the RPA. This is a small incursion which could be mitigated through appropriate construction methods.”

This satisfactorily addresses the issue raised by HCC highways.

#### **vi. Gradient profile**

The applicant’s Response document states that “The detailed alignment of the access road is not determined at this stage as the application is in outline”.

In order to determine that the access can be constructed at the intended location, the gradient of the access road into the site is considered a material consideration at Outline stage. The Response

document states that: “the initial 15m of the access road has been designed with a 4% gradient in line with Design Manual for Roads and Bridges (DMRB)” and “The remainder of the access could be designed at a gradient of 6% in accordance with DMRB or 5% in accordance with HCC design guidance.”

This confirms that an HCC condition for maximum gradient of 1 in 20 can be applied to the proposed main access road into the development.

#### **vii. Visibility splays**

The Response document confirms visibility splays are provided in their drawing no. ITL200107-GA-002 Rev E which has been updated plan to show the visibility splay from the proposed new access road. As noted in iv above the road safety audit team will be reviewing the documentation, including the road safety audit and Designer’s response which would include visibility issues. This view should be provided shortly.

#### **viii. Policy 5(f)**

As noted in HCC comments dated 6 August, 2025, “A vehicular access is proposed directly onto the A4008. Policy 5(f) of HCC’s Local Transport Plan 2018 states that HCC as HA will “Only consider new accesses onto primary and main distributor roads where special circumstances can be demonstrated in favour of the proposals”. In this respect the proposal was considered by HCC’s Strategic Transport Infrastructure Board (STIB) on 5 March 2025. The view of STIB was that on the basis that this site does not have Local Plan designation it should not be deemed to have special circumstances at the current time.”

HCC maintains its objection in this respect. It is noted that the Response document states that “...if development is acceptable in this location whether through a LP designation or a planning application that would constitute special circumstances.” It is acknowledged that the LPA will need to consider policy 5(f) against this and other considerations.

#### **Conclusion**

The documentation including the road safety audit and Designer’s response is to be reviewed by HCC’s safety team. These will be provided as additional comments shortly.

The applicant has proposed a meeting with HCC highways and the LPA. This is welcome and should allow any outstanding matters to be addressed.

#### **Signed**

Graham Burrell

1 October 2025