



National Highways Planning Response (NHPR 25-01) Formal Recommendation to an Application for Planning Permission

From: Michelle Berrington (Head of Planning & Development)
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To: Three Rivers District Council (FAO Claire Westwood)

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

Council's Reference: 24/2073/OUT

Location: Land To North Of Little Green Lane, Croxley Green, WD3 3SP

Proposal: Outline Application: Development of up to 600 residential dwellings (Use Class C3(a)), construction of a 5-bedroom property for children's social care and supported living (Use Class C3(b)). Two vehicular access points from Little Green Lane and further pedestrian / cycleway accesses. A one form entry primary school (Use Class F1(a)) (plus expansion land for a two form entry primary school). A mixed use local centre including provision for NHS health and social care services (Use Class E(e)), community building (Use Class F2), retail and cafe provision (Use Class E(a-c)), car parking and associated infrastructure. A country park, areas for play and recreation, allotments, community orchard and landscaping with associated infrastructure including sustainable urban drainage systems. (Layout, scale, appearance and landscape as reserved matters).

National Highways Ref: NH/25/09637

Referring to the consultation on a planning application dated 21 January 2025 referenced above, in the vicinity of the M25, J18 and 19, the M1 J5 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

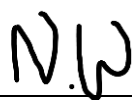
This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority propose not 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.

This response and all comments outlined herein are made in respect of planning matters only in National Highways' position as a statutory planning consultee, and does not confer any proprietary rights nor amount to the giving or refusal of consent, assent, approval, or awareness of or by National Highways in or of any other aspects or matters (including, but not limited to, the use of property belonging to National Highways). If anyone wishes for National Highways to consider any aspects which do not relate to planning submissions, they should call our contact centre on 0300 123 5000.

Signature:



Date: 10 February 2025

Name: Nigel Walkden

Position: Assistant Spatial Planner

National Highways: Bridge House, 1 Walnut Tree Close, Guildford GU1 4LZ

¹ Where relevant, further information will be provided within Annex A.

Annex A **National Highways' assessment of the proposed development**

National Highways was 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.

National Highways is interested whether there would be any adverse safety implications or material increase in queues and delays on the SRN as a result of the proposed development, in this case on the M25 J18 and 19, and the M1 J5.

Proposed Development

The proposed development includes construction of up to 600 dwellings and a 5-bedroom property for children's social care and supported living. Two vehicular access points from Little Green Lane are proposed, as well as further pedestrian and cycleway access points. A one form entry primary school, plus expansion land for a two form entry primary school are also proposed alongside a mixed use local centre with provision for NHS health and social care services, a community building, retail units and café provision. A country park and areas for play and recreation, allotments, community orchard and landscaping with associated infrastructure including SuDS are also included in the development proposals.

A bus service is also proposed to be secured via s106 contribution to serve the site, and the development will provide a suitable contribution towards the implementation of step-free access at Croxley Underground Station.

We have reviewed the Transport Assessment (TA) provided as part of the planning submission, written by Hub Transport Planning Ltd.

Trip Generation

Table 7 in Section 6 of the TA sets out the total trip generation expected from the residential aspect of the proposed development, including both market and affordable dwellings. The proposed development is expected to generate 254 two-way vehicle trips in the AM peak period, and 267 two-way vehicle trips in the PM peak period. In both periods, this equates to just over 4 additional vehicles per minute. Following an internal replication of the selection parameters provided using TRICS, National Highways are satisfied that the expected trip generation is accurate.

The trip generation provided in the TA does not include any other aspect of the proposed development, including the expected trips generated from the primary school use, or the mixed use local centre with NHS health and social care facilities, retail and café provision, or the country park and outdoor play / recreation areas.

Paragraph 6.9 states that it was previously agreed with Hertfordshire County Council (HCC) that the “great majority of movements to/from school will be local in nature and that traffic movements associated with the school will be limited”. Paragraph 6.10 similarly states that “the majority of traffic movements to/from the local centre are likely to be undertaken by those from the development or from residents just to the south of the development, and likely to be undertaken by active travel modes. Therefore, no additional traffic has been added for these development proposals”.

National Highways accept that this is an outline application and the trip impact from the non-residential uses of the proposed development on the SRN are likely to be minor. However, as the anticipated trips from the residential uses alone are already relatively high, we require this additional information to understand the full potential traffic impact of the proposed development, particularly given the proposed country park and play space uses may generate a significant number of external vehicle trips.

We request that the additional information is provided, including the anticipated trips generated from the non-residential uses of the proposed development with internalisation factors applied, and justification for the proposed internalisation factors.

Trip Distribution and Assignment

Figure 7.5 and Figure 7.6 illustrate the total anticipated traffic flows on the local highway network including the 2030 Future Year Base Flows, committed development traffic flows and the proposed development traffic for the AM and PM peak periods. The impact of the proposed development on the SRN has not been considered as part of the TA despite there being several connections to the SRN from the proposed development site, namely via the M25 J18 and 19, and the M1 J5. Due to the relatively high number of trips predicted to be generated from the proposed development, in addition to the trips generated from committed development in the surrounding area, **National Highways request that the trip distribution/assignment exercise is extended to the nearby SRN junctions and provided for review before further comments are made. This should be presented as turning movements for the sensitive weekday AM and PM peak hours.**

Junction Capacity Assessments

Section 7 of the TA sets out the traffic impacts, growth rates and the outputs of the junction capacity assessments. Junctions with the SRN are not included in these assessments. Due to the relatively high volume of anticipated vehicle trips from the proposed development, it is possible that further junction capacity assessments may be required to assess the impact on the SRN. This will be determined following the provision of the additional information requested above, including the trip distribution/assignment at the SRN junctions.

Sustainable Transport

We have reviewed the Framework Travel Plan supplied and relevant sections of the TA relating to sustainable transport. Section 4 of the TA (replicated in the Travel Plan) outlines the accessibility of local facilities, i.e. education, retail and health care services, by foot, cycle and public transport, demonstrating that the proposed site is readily accessible by a variety of transport modes that have the potential to reduce reliance on the private car.

The active and sustainable transport proposals set out in Paragraphs 4.72 to 4.90 suggest that new pedestrian and cyclist access routes and links are proposed and there is potential to expand the Beryl cycle hire scheme with a bike station on site. Proposals also include a bus service into the site via Durrants Drive to serve Watford and major destinations between Watford and the proposed site, as well as important transport hubs.

National Highways welcomes sustainable transport measures being the primary means to off-set any severe / significant development impacts on the SRN, although for us to take these measures into account, these would need to be worked up to a position where we can understand the likely mode shift benefits they could provide.

National Highways agree that in principle the measures proposed will help reduce travel demand by private vehicle on the SRN, particularly the proposed provision of a bus service providing connections to important transport hubs and Watford. **The applicant should provide further information regarding the proposed routing and service frequency etc of this bus service for us to review.**

Construction Traffic

National Highways request that a construction traffic impact assessment is carried out and provided for review, to allow us to understand the potential impact of construction HGVs and workforce traffic on our network, particularly during the peak construction period.

A Framework Construction Traffic Management Plan (FCTMP) should also be provided to mitigate any potential impacts identified.

Recommended Non-Approval

Given the above, it is currently not possible to determine whether the application would have an unacceptable impact on the safety, reliability and/or operational efficiency of the SRN (the tests set out in DfT Circular 01/2022 and MHCLG NPPF2024 [particularly paras 115 to 118]). This response details the steps that need to be taken in order to resolve this issue.

In light of the above, National Highways currently recommends that planning permission not be granted (other than a refusal if the Council so wishes) for a

period of three months from the date of this response to allow the applicant to resolve the outstanding matters.

This recommendation can be replaced, renewed, or reviewed during the three-month period, or at its end, dependent on progress made with regards to the outstanding matters.'

It is recommended that the application should not be approved until 11 April 2025.

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 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

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.