



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

From: Michelle Berrington (Head of Planning & Development)
Operations Directorate
South East Region
National Highways
PlanningSE@nationalhighways.co.uk

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 and 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

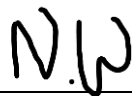
This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

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: 30 July 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 20, and the M1 J5.

We have reviewed the Amended Transport Assessment (ATA), Amended Travel Plan (ATP) and associated appendices provided as part of the planning submission update, written by Hub Transport Planning Ltd.

Trip Generation

We note that HCC requested the exclusion of a site surveyed due to low levels of parking and potential low levels of vehicle trip rates. As only one affordable site remained, we agree with the approach to use Land Use 3M within TRICS.

The AM peak period (08:00-09:00) is estimated to generate 315 two-way vehicle trips and the PM peak period (17:00-18:00) is expected to generate 304 two-way vehicle movements. Following the completion of internal comparison checks using TRICS, we are satisfied that the trip generation presented in Table 3 of the ATA is accurate.

We note that the ATA includes the requested trip generation for the primary school use and mixed local centre. We agree with the methodology used to establish the educational trips to the proposed development and are satisfied that the car-based arrivals to the site will travel via the local highway network. We also accept the reasoning behind the exclusion of the local centre and health centre use vehicle trips and are satisfied that those trips are unlikely to use the SRN.

Trip Distribution

We note that the ATA includes the traffic distribution for the SRN junctions as requested. We have reviewed the traffic distribution information provided in Appendix H and summarised in Table 7 of the ATA.

Travelling inbound in the AM peak period (08:00-09:00) and the PM peak period (17:00-18:00) the M25 J18 NB is expected to see an increase of 5 additional vehicles. At the same junction travelling outbound, the AM peak is expected to see an increase of 16 vehicles and the PM peak is estimated to see an additional 15 vehicles.

The highest volume of inbound traffic assigned to the SRN is 34 additional vehicles travelling SB on the M25 J18 in the AM peak and 33 additional vehicles travelling in the PM peak at the same junction. Travelling outbound, the M25 J18 SB is expected to see an increase of 50 vehicles in the AM peak hour and 49 additional vehicles in the PM peak hour. In the AM peak, typical traffic at the M25 J18 shows slow moving vehicles on Rickmansworth Road (A404) due to the signalised junction with the M25 J18 slip roads. The additional inbound vehicles at the SB off-slip are likely to cause further queuing on the off-slip due to the slow-moving vehicles at the signalised junction. The additional outbound vehicles have the potential to add to the congestion build up on the A404 and cause further queuing which may have implications for the SB on-slip.

An additional 15 inbound vehicles are expected at the M1 J5 NB in the AM peak period and an additional 27 inbound vehicles are expected in the PM peak. An additional 15 vehicles are expected to travel outbound at this junction during both peak periods. Travelling SB at the M1 J5, there are estimated to be an additional 15 inbound vehicles in the AM peak and an additional 16 inbound vehicles in the PM peak. Travelling outbound, an additional 29 vehicles are expected in the AM peak and an additional 28 vehicles are expected in the PM peak.

The M1 J5 SB off slip entering the Berrygrove Interchange experiences slow moving traffic during both peak hours. The inbound SB traffic at this junction has the potential to exacerbate this issue further and cause blocking back on the SB off-slip.

Traffic Impact

Section 6 of the TA sets out the traffic impacts, growth rates and the outputs of the junction capacity assessments carried out for local highway junctions surrounding the proposed development site.

Development proposals can be considered unacceptable by virtue of a severe impact if they increase demand for use of a section of the network that is already operating near or over capacity, or where the additional traffic cannot be safely accommodated on the SRN unless mitigation is agreed. National Highways considers that any development trips adding to a junction off-slip which then results in mainline queuing, extends a mainline queue, and / or increases the frequency at which mainline queuing occurs to be an unacceptable safety impact.

Both the M1 J5 and M25 J18 are observed to have significant existing off-slip queues which extend back towards their respective mainline carriageway in the AM and/or PM peak, such that any increases in flow on these off-slips may result in mainline queueing. Following a review of the trip distribution and the levels of existing congestion at each of the affected SRN junctions, **we request that the junction capacity assessments are extended to include the SRN junctions, particularly the M25 J18 and the M1 J5.** This will allow us to assess the full traffic impact of the

proposal on the safety and operation of the SRN. Until this work is undertaken National Highways cannot satisfactorily consider the impact of the development on its network.

Sustainable Transport

We have reviewed the Amended Travel Plan provided which 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.

Section 5 sets out the Travel Plan Targets which states that the developer is confident that a 15% reduction in single-occupancy car use can be achieved based on the journey to work modal split indicated by the census data. This would reduce car driver trips by 8.2% to 42% from 55.2%. The drivers for this change are expected to be the provision of local facilities on site, reducing the need to travel by car and encouraging more active travel, the proposed shared-use walking/cycling facility, the inclusion of a Beryl Bikes facility on site, the enhancement of the existing local bus service (service 22) providing sustainable access to off-site facilities, bus taster tickets for each household and the inclusion of a car club on site which has the potential to reduce private car ownership. These measures are further explored in Section 6 of the amended Travel Plan.

National Highways welcomes sustainable transport measures being the primary means to off-set any severe / significant development impacts on the SRN. We are satisfied that 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.

Construction Traffic

Table 8 of the ATA outlines the anticipated construction traffic from the proposed development and Table 9 shows the maximum daily construction traffic trip generation. It is estimated that the proposed development will generate a maximum of 63 two-way daily vehicle movements. It is expected that 12 of these daily movements will be two-way HGV movements.

We note that the FCTMP requested in our previous response will be conditioned as part of formal planning permission being granted for the proposal.

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 30 October.

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.