



Mark Youngman
Development Management Group Manager
Hertfordshire County Council
Postal Point CHN115
Farnham House
Six Hills Way
Stevenage
SG1 2ST

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: 24/2073/OUT
HCC ref: TR/23653/2025
HCC received: 21 January 2025
Area manager: James Dale
Case officer: Lee Smith

Location

Land To North Of Little Green Lane Croxley Green WD3 3SP

Application type

Outline

Proposal

Outline Application: Development of up to 600 residential dwellings (Use Class C3(a)), construction of a 5-bedroom property for childrens 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).

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:

There is insufficient information supplied with this application to enable the Highway Authority to reach a recommendation. In the absence of the necessary information, the Highway Authority recommends refusal due to doubt over possible implications for the free and safe flow of public highway users.

Access Comments

Durrants Drive - Little Green Lane junction there is clear evidence of vehicles over-running the grass verge, the proposed design will need to consider this issue in terms of the geometrical design and construction i.e the footway / cycleway will need to have suitable loading capacity for HGV's.

Section of Durrants Drive from Dover Way to Little Green Lane more heavily parked due to housing layout and several properties not having driveway provision. This creates a situation with vehicles parking on the footways, traffic movement through this section will be problematic with development traffic creating congestion.

The proposed footpath / cycleway along Canterbury Way as it passes over Little Green Lane will require further design consideration, currently the proposal shows the route crossing the existing road we are assuming that the levels are the same as the existing footway so a raised table would be required at this junction

Dover Way between the junction of Canterbury Way and Links Way narrower than both Durrants Drive and Links Way noticeable parking occurring on footways. If the road is narrowed to introduce a pedestrian / cycle link this issue will need to be considered. Also, at the junction of Canterbury Way / Dover Way the northern kerbline on the western side of the junction would also need to be realigned with some hatching provided otherwise vehicles travelling in an eastbound direction will be swerving by the junction as they try to avoid the footpath/cycleway build out.

We require a Stage 1 Safety Audit for the access options.

Cycle Route Comments

The proposed shared footway/cycleway will be located along the northeastern side of Canterbury Way, the existing width is approximately 3.0m wide some minor widening works may be required subject to detailed design. This section has the lighting columns set at the back of the footway which assists in providing a continuous width for pedestrians and cyclists, there are two highway trees near to the junction with Dover Way that will need to be removed. The route then joins onto Dover Way this section of the route will be located on northern side, the route will require the widening to provide a shared footway/cycleway. The lighting columns set at the back of the footway however three trees are located in the footway these will need to be removed. Cyclists will then cross Dover Way near to the junction with Links Way using the proposed raised table and the head along Links Way. This section of the route will be located on the western side of the road, the route will require the widening to provide a shared footway/cycleway. There are telegraph poles and lighting columns located at the front of the existing footway that will obstruct the proposed route once the widening occurs. This infrastructure should be relocated to the back of the footway. Two trees are located along the route these will need to be removed.

We require a Stage 1 Safety Audit for the cycle out options.

TA – General Comments

Traffic Data

Paragraph – 3.14 and 3.15 lists the location of the classified turning counts and 3.16 states that these along with the queuing data are included in Appendix B. Some of the counts are missing and there is no queuing data included for any of the junctions listed. Also, the baseline flows listed as Figures 3.1 to 3.4 in paragraph 3.9 have also not been included. Without this information we are unable to review any of the modelling outputs or check the flow diagrams for baseline and future year scenarios.

Accident Data

Paragraph 3.20 refers to the review of Personal Injury Accidents along the site frontage and in the vicinity of the site with locations identified in Appendix D. It appears that several locations identified on the image in Appendix D have not been referred to in Table 1. An example is along Rousebarn Lane and the link to north of Croxley Danes School where it appears that three slight accidents and one severe accident has occurred. Also, the image shows a fatal accident along Sarratt Road, please explain why these locations have not been included and if other locations have been discounted, please provide a list and an explanation of why. The route along Rousebarn Lane could be well used by both pedestrians and cyclists so we wish to see this area included.

Accessibility by Foot / Walking Audits

This proposed development needs to promote as many options as possible in terms of providing alternative modes of travel beyond site boundary. The new proposed pedestrian / cycle links to the south of the site provides one set of measures. However, as part of this application other routes to the east need further consideration.

The indicative active travel image as set out on page 147 of the Design Access Statement Design Code shows internal footpath/cycleways connecting onto footpath Sarratt 017 which connects onto Watford Borough 031 this provides a route through Cassiobury Park to Watford Railway Station this route is approximately 2.8km. It has not been included in the Walking Audit but provides another opportunity of promoting connectivity to the site.

This proposed development needs to promote as many options as possible in terms of providing alternative modes of travel to residents and as such we would be seeking improvements to these routes. The Transport Consultant should firstly audit the route via Sarratt 017 / Watford Borough 031 via Cassiobury Park and identify where improvements could be made and costing provided.

With regards to the alternative route to Watford Station via Rousebarn Lane this route is the shortest route to the railway station, there are opportunities to improve this route. The Transport Consultant should provide a series of measures to enhance this route for both walking and cycling and provide costings.

Accessibility by Bus

Paragraph 4.50 of the Transport Assessment indicates that to enhance the appeal of using public transport from the proposed development, it is proposed to bring a service into the site to serve Watford and important transport hubs along with major destinations between the site and Watford.

We have noted that there is no information regarding the anticipated service provision, or which existing route will be diverted into the site. Or is the bus route a new service that will serve the destinations described above? Will any additional stops be provided along Durrants Drive to serve this existing residential catchment for this service?

Secondly there is no evidence that any dialogue has taken place with bus operators. The introduction of a bus service into the site, is one of many measures to assist in promoting sustainable travel options for residents, as it is imperative that a bus service is provided and therefore, we will require further evidence that this is supported by the bus operators along with costings for the service. So this can be incorporated into the Section 106 agreement.

Paragraph 4.77 states that bus stops and shelters will be on site along with real time bus information.

Chapter 5 set out details of the development proposals with reference to the site access strategy paragraph 5.4 indicates that existing width of Durrant Drive will be maintained, with buses entering the site from Durrants Drive completing a loop around the primary street network and exiting the site along Durrants Drive. Durrants Drive will have priority over Little Green Lane for motor vehicles, cycles and pedestrians.

Accessibility by Rail

It is noted that as part of this proposed development it will provide a suitable contribution towards the implementation of step-free access at Croxley Underground station. This will need to be finalised so it can be secured via S106 contribution if the application is considered for approval at a later date.

Car Parking

Paragraph 5.10 states that “Sufficient car parking for the site will be provided in accordance with Three Rivers and Hertfordshire County Councils Parking standards to provide on plot parking spaces and secure cycle storage for residents of the development site, and to provide suitable levels of parking for staff at the school and at the local centre”. Firstly, Hertfordshire County Council do not have any parking policy this is set by the LPA.

Paragraph 5.14 and 5.15 sets out reduced levels of parking for the local centre. The proposed level of parking is 126 spaces, with the emerging LP requirement listed as requiring 166 spaces, thus a 40-space shortfall is being delivered. Paragraph 5.17 states the following “*The main purpose of the provision of the local centre on the proposal site is to serve the needs of the development. Any such trips to the local centre from the development will predominantly be undertaken by walk or cycle and, therefore, typical parking standards will not apply*”. However, a significant proportion of the shortfall relates to the residential element of the scheme, people living in this location are not travelling in from the wider development, so this rational would apply to this land use. If the local centre is going to viewed as having reduced parking provision, then some form of parking controls will be required so parking is not abused by residents, and it is available to all visitors to the local centre.

It is unclear how the figure of 187 spaces quoted in paragraph 5.22 has been derived and what relevance it has to the parking provision quoted in paragraph 5.14 and 5.15.

Paragraph 5.23 states that “*community parking in Durrants Square (42 spaces) and close to the school (16 spaces), will not be assigned to any particular use. This proposal offers the ability of uses to efficiently share parking and therefore minimise the amount of space taken up by parking in the development*”. Refer to point above regarding the residential element of the scheme and the risk of overspill parking from this land use into this area.

Traffic Generations

We have reviewed the trip rates, and we have some concerns with the affordable housing trip rate that has been used. We appreciate that TRICS has limited sites available but after further reviewing the selected site it has come to our attention that site EX-03-B-01 has low levels of parking when compared to the other selected sites which is lowering the trips rates

This site should be deselected, and the trip rate calculations and all the supporting information should be updated to reflect the revised flows.

Traffic Impact and Assessment

The following points have been previously mentioned we have repeated them again under this section as they are fundamental to the review of the traffic impacts.

Figures 3.1 and 3.2 are missing so we are unable to review the baseline flows and compare the information to the surveyed data. These figures should also include the PCU conversion factors so we can undertake checks. Subsequently we cannot confirm the future year flows as these use the baseline data as part of calculation process. This issue will also affect our ability to check the traffic matrices in the modelling outputs.

Appendix B includes junction location imagery and the manual classified turning counts, we have noted that some of counts are missing these should be provided.

Queue length survey information has not been included, this is referenced in the TA as some of junction modelling has been calibrated, please provide this information. Queue length surveys should have undertaken for several days to provide an accurate representation of current levels of queuing.

Junction Modelling

Appendix H - Site Access Junction – Little Green Lane (NE)/ Durrants Drive/ Little Green Lane (SW)

- Minor Arm visibilities have been set to 0m for two of the inputs we would expect any proposed access to provide adequate visibility provision to meet safety audit requirements, as two of the visibility inputs relate to visibility splays passing into the site from the minor arms this can be improved.
- Major Arm carriageway width is incorrectly inputted refer to the proposed junction design that has been submitted as part of this application.
- HGV matrix has all movements at zero baseline traffic data shows HGV's therefore this matrix should be updated.

Appendix I - Little Green Lane (NE) / Links Way / Little Green Lane (SW)

The submitted outputs relate to the junction of Baldwins Lane / Links Way these have been submitted in the wrong appendices.

- The major arm carriageway width has been incorrectly inputted.
- The minor arm has no flare, and the splitter island reduces the minor arm widths.
- HGV matrix has all movements at zero baseline traffic data shows HGV's therefore this matrix should be updated.
- Please provide a drawing showing the geometry measurements, we have concerns in relation to the inputs.
- The interaction of the Winton Drive junction which located 30m east of Links Way has the potential to create additional delays along Baldwin Lane, the road markings along the major arm have been modified so that the Winton Drive has a longer right turn storage capacity at the junction. The assessment should model the junctions as a staggered crossroad and the pedestrian crossing by the school should be included in the assessment, as this will create delays along major road especially in the AM Peak. New traffic survey and pedestrian counts will be required for this updated analysis. to address this point.

Appendix J - Baldwins Lane (W) / Links Way / Baldwins Lane (E)

The submitted outputs relate to the junction of Little Green Lane (NE) / Links Way / Little Green Lane (SW) these have been submitted in the wrong appendices

The following comments relate to the outputs within Appendix J for the junction of Little Green Lane (NE) / Links Way / Little Green Lane (SW)

- Minor Arm visibilities have been set to 0m for three of the inputs we would expect any proposed access to provide adequate visibility provision to meet safety audit requirements, as two of the visibility inputs relate to visibility splays passing into the site from the minor arms this can be improved.

- Major Arm carriageway width incorrectly inputted.
- HGV matrix has all movements at zero baseline traffic data shows HGV's therefore this matrix should be updated.

Appendix K – A412 Watford Road (W) / New Road / A412 Watford Road (E)

- The minor arm lane width of 2.2m is incorrect.
- Please provide a drawing showing the geometry measurements, we have concerns in relation to the inputs
- HGV matrix has all movements at zero baseline traffic data shows HGV's therefore this matrix should be updated.

Appendix L – Winton Drive / A412 Watford Road

- Please confirm the Major Arm carriageway width it is difficult to read the pdf document that has been submitted.
- HGV matrix has all movements at zero baseline traffic data shows HGV's therefore this matrix should be updated.
The modelling for the junction of A412 Watford Road and Winton Approach has been submitted in Appendix L by mistake.

Appendix M – Winton Approach / Watford Road

- Please provide a drawing showing the geometry measurements, we have concerns in relation to the inputs, the mainline carriageway has advisory cycle lanes along so it's unclear how the major arm width has been calculated.
- HGV matrix has all movements at zero baseline traffic data shows HGV's therefore this matrix should be updated.

Appendix N – Manor Way / Baldwins Lane / Repton Way

- Please provide a drawing showing the geometry measurements, we have concerns in relation to the inputs, for example Arm A has a flare of 3.3m it's clear that this arms approach onto the mini roundabout is relatively straight and no radius is provided until after the give way point so it's not possible to have a flare length of over 3m. This would apply to the other arms as well. Also, the distances to the next arm and entry corner kerb line distances raise some concerns.
- HGV matrix has all movements at zero baseline traffic data shows HGV's therefore this matrix should be updated.

Appendix O – A412 Watford Road (E) / Sea Cadets / A412 Watford Road (S) / Baldwins Lane / Car Panet.

- Please provide a drawing showing the geometry measurements, we have concerns in relation to the inputs, for example Arm D has an entry width of 5.4m however this approach has a two-lane entry, the existing lane widths are not 2.7m. Also, google imagery shows parking occurring after the bridge which starves the nearside lane capacity, the geometry input shows arm D as having a flare of 22m it's unclear how this has been calculated and what assumptions are being made to the parking issue. The inscribed circle diameter for Arm E is 32m this also appears to be incorrect.
- HGV matrix has all movements at zero baseline traffic data shows HGV's therefore this matrix should be updated.

Appendix P – A412 Rickmansworth Road / Ascot Round Roundabout

- We have noted that within the TA reference is made to calibration being used for this junction. No information has been provided with the Transport Assessment in relation to queue length surveys.

- Please provide a drawing showing the geometry measurements, the entry width for arm A appears to be less than what has been inputted. Also, the radii for the arms appears to be incorrect.
- HGV matrix has all movements at zero baseline traffic data shows HGV's therefore this matrix should be updated.
- As this roundabout is so close to the Whippendell Road / Ascot Road roundabout they should be assessed as linked roundabouts, due to the lane configurations the modelling should consider lane simulation mode in ARCADY. The results show queues of between 25 - 41 vehicles in future year scenarios this level of queuing would block back onto the Whippendell Road / Ascot Road roundabout which is another reason why modelling the roundabouts as linked junctions may provide a more accurate assessment of the impacts.

Appendix Q – Raven Close / Whippendell Road / Ascot Road

- We have noted that within the TA reference is made to calibration being used for this junction. No information has been provided with the Transport Assessment in relation to queue length surveys.
- Please provide a drawing showing the geometry measurements, we have concerns in relation to the inputs, for example Arm A has the half width as 3.0m this is incorrect as Raven Close is narrower. Also, the flare length for Arm D appears to be incorrect. For Arm E the half width is shown as 10.0m and the entry width as 11.4 with a flare length of 10m, and the entry radius is shown as 25m. These inputted geometries are incorrect.
- HGV matrix has all movements at zero baseline traffic data shows HGV's therefore this matrix should be updated.
- As this roundabout is so close to the A412 Rickmansworth Road / Ascot Round Roundabout they should be assessed as linked roundabouts.
- Along Whippendell Road / Ascot Road there is a Premier Inn and Health Centre along with other land use and bus stops all of which could generate a reasonable level of pedestrian movements. Therefore, the pedestrian crossing facilities should have been surveyed and included in the ARCADY analysis as they could create delays that may result in queuing occurring onto the roundabout due to the close proximity.

Appendix Q – Durrants Drive / Baldwins Lane

- We have noted that within the TA reference is made to calibration being used for this junction. No information has been provided with the Transport Assessment in relation to queue length surveys.
- Please provide a drawing showing the geometry measurements, we have concerns in relation to the inputs, for example Arm C has a flare of 3.4m it's clear that this arms approach onto the mini roundabout is relatively straight and no radius is provided until after the give way point so it's not possible to have a flare length of over 3m. This would apply to the other arms as well. Also, the distances to the next arm and entry corner kerb line distances raises some concerns.
- HGV matrix has all movements at zero baseline traffic data shows HGV's therefore this matrix should be updated.

Design and Access Statement – comments

The indicative pedestrian cycle and movement strategy appears to have some discrepancies between the image and the key, this relates to the green routes where they appear to be described the wrong way around.

The plan shows two potential access/egress for cyclists and pedestrians only onto Little Green Lane these are identified with yellow arrows, the issue with the access located opposite Durant House is the narrowing of the footway on the southern side of Little Green Lane, if pedestrians exit at this location and wish to head towards Lincoln Drive they are forced to work in the road especially if they

have a child's buggy. By adding another connection west of the proposed access point would resolve this issue.

Travel Plan Review

General comments:

There is potential for this site to be sustainable, if adequate infrastructure and services are provided.

If the site can be included in the Beryl Bikes scheme with a docking station on site this would help to encourage active travel, and a bus service diversion is proposed but no details given – this is required to make bus use more attractive as current bus stops are well over the recommended 400m away. According to the Travel Plan, contributions have been requested by TfL towards lifts at Croxley Underground station which would improve accessibility of the station for site residents and visitors.

This Travel Plan requires significant amendment in a number of key areas before we can approve, in particular in relation to the inclusion of clearly stated aims and objectives, Travel Plan Co-Ordinator duties and plan management, a wider range of measures, revised targets, monitoring method and travel plan duration.

As the Travel Plan is intended to cover the whole site, which is mixed use, the plan is a Framework Travel Plan. Individual Travel Plans will be required to be produced prior to occupation for land uses on site which meet the criteria set out in Appendix A of our Travel Plan Guidance (www.hertfordshire.gov.uk/travelplans). The primary school will also be required to produce an Education Travel Plan. The individual Travel Plans will be expected to be in general alignment with the Framework Travel Plan but with measures tailored to the land use in question.

Detailed comments are as follows:

Site details/introduction:

- The site location plan is provided as a figure in the appendix only and does not show the boundary of the site – usually a smaller version of the location plan is integrated into the main text at the relevant point which helps understanding of the geographical context and the site given a red line boundary to clearly illustrate its extent (as in the separate Location Plan provided as part of the application but not part of the Travel Plan).

Outcome objectives:

- There should be clearly stated aims and objectives for the Travel Plan in a dedicated section. The Travel Plan objective is not in Section 3 as stated, and whilst paragraph 5.1 comes close to being an objective it is not stated as such, nor are paragraphs 6.1-6.3 which also cover relevant ground, and obviously these paragraphs are not even together. There should be objectives around positive impacts on health/environment and reducing traffic impacts, levels of awareness of the Travel Plan, reducing the need to travel in the first place as well as reduction in single occupancy vehicle use mentioned in 5.1.

Travel Plan Management:

- Travel Plan Co-Ordinator contact details should be provided on appointment along with those of a secondary contact in case of personnel changes. Frequency on site and time allocated to the role should be provided once known and a list of expected duties is required now. These are all indicators for us that the role has been understood and sufficient resource (in terms of both people and funding) will be provided to undertake the role effectively.

- We require a statement of commitment to the robust implementation of the Travel Plan from a suitable member of developers' senior management prior to occupation – this is to demonstrate senior level commitment to the effective implementation of the plan.
- More detail should be given as to how the Travel Plan will be managed. As a Framework Travel Plan, with individual Travel Plans for land uses on site sitting beneath this, the Travel Plan Co-Ordinator will be required to liaise between representatives of the different land uses and gather feedback on the effectiveness of measures and progress towards the overall objectives and targets within the Framework Plan. A Steering Group or similar which meets regularly and is formed of relevant stakeholders should be considered – this can improve levels of engagement and target initiatives more effectively.

Measures:

- Measures are generally appropriate although given the scale of the site, we would usually expect a wider range. Suitable additional measures include promotion of HCC cycle training, provision of cycle repair equipment, Dr Bike sessions, active travel events, promotion of local cycle hubs/cycling groups, showers/lockers/changing facilities in land uses other than residential, Bicycle User Group, information provision re local walking groups, walking/cycling buddy scheme, promotion of national active travel events, promotion of Intalink website for bus/rail information (<https://www.intalink.org.uk/>).
- Again given the scale of development, provision of a car club car on site should be considered not just promotion of Liftshare and EV charge points. People may be more willing to share with people living close-by that they know.
- There is no detail on car parking provision which can affect the relative attractiveness of sustainable modes of transport, not just total no's but inclusion of car share spaces and provision for electric vehicles.

Targets, monitoring and action plan:

- Targets proposed lack ambition. We seek a minimum 10-15% mode shift for a 5 year plan – this being based on experience of what is realistic and achievable. Whilst single occupancy vehicle use indicated by the Census data is relatively low, this is only for commuting trips and actual baseline figures for the site may well be higher and given the length of travel plan required for the residential element, greater levels of modal shift should be aspired to.
- Travel surveys are proposed, but little detail given as to exactly what this means – for a site of this scale, we require TRICS SAM standard (or equivalent) multi-modal counts as well as questionnaires. This ensures adequate data is obtained, both qualitative and quantitative. This helps give a more complete picture of travel patterns and why people are travelling the way they are which can inform revisions to the Travel Plan after each monitoring period.
- Paragraph 7.12 suggests an annual survey for a period of 3 years – we require annual monitoring until 5 years post full occupation of residential element, for 7 years for the Education Travel Plan and for 5 years from first occupation for commercial land uses with an individual Travel Plan.

Evaluation and Support Fees:

- We require an Evaluation and Support Fee of £1200 per year (for the residential Travel Plan which should be in place until 5 years post full occupation) index linked to RPI from March 2014. Education Travel Plans require a fee of £1500 per year (linked to RPI from March 2020 for 7-year plan) and business/workplace Full Travel Plans a fee of £1200 per year (for a -year plan).

Plan approved? No

Signed

Lee Smith

28 February 2025