

Land North of Little Green Lane

Planning appeal – Personal statement, Andrew Gallagher

SV

Thank you for the opportunity to speak.

I have lived in Croxley Green since 1981. For the first ten years we lived on Canterbury Way, close to the appeal site. **PERSONAL CAPACITY.**

More recently I have been a parish councillor and was involved in the preparation of our Neighbourhood Plan.

The adjoining Green Belt is a very precious part of the setting of Croxley Green. The fields, footpaths, and accessible woodlands are part of what make Croxley Green such a special place to live.

Although the appeal site is in the parish of Sarratt, all the traffic and transport impacts will be on the residents of Croxley Green and further afield in Watford and Three Rivers.

The proposed access routes from Baldwins Lane via Durrants Drive or Links Way will have a major impact on the quality of life for the residents on those roads and the adjoining streets and lanes.

If, despite the concerns and objections of many of our residents, the Government is determined to build houses on this site, and you are minded to allow this appeal, I would like to draw your attention to some of the traffic and transport impacts, specifically:

- The amount of traffic generated,
- The impact on residents on local roads, and
- The proposed mitigation measures.

THE AMOUNT OF TRAFFIC GENERATED

From a simple count of the number of houses, the proposed development of 600 homes with ancillary services will approximately double the amount of traffic on Durrants Drive and Links Way at their junctions with Baldwins Lane.

When we lived on Canterbury Way we owned one car, which my wife needed for her work. I relied on a bicycle and public transport.

I worked locally, in Garston on the other side of Watford, over 5 miles away. Even then the bus service was too slow and unreliable to reach Garston and I preferred to cycle along busy roads.

Then I worked in central London, travelling via Croxley metropolitan line station, a walk of just over a mile. It was too far to walk as part of a daily journey of well over an hour each way, even with a reliable train service, and I cycled to the station until I fell off one winter's day on an icy road.

Many of the appellant's documents refer to the accessibility of the site.

Statement by Andrew Gallagher

Our experience was that this is far too remote from public transport and eventually we had to get a second car to enable both of us to work and raise our children.

More recently the 2021 census shows a very high level of car ownership in the neighbouring local output areas. Averaging across the three output areas nearest to the site 60% of the homes have 2 or more cars or vans and only 4 per cent have no vehicle.

There is very heavy reliance on cars for travel and personal transport, and this will undoubtedly be the same on the appeal site, whatever the appellants may claim.

There is already extensive on street parking on both Durrants Drive and Links Way and on adjoining streets, with pavement parking with two wheels on the footway and two wheels on the roadway.

This tends to reduce traffic speeds as there is less room for two cars to pass where other cars are parked. If this appeal is allowed measures will be needed to control traffic speeds and to control pavement and on street parking.

IMPACTS ON LOCAL ROADS

During the construction phase the main impacts will be construction traffic, construction workers' vehicles, etc. and construction impacts such as noise, dust, dirt, etc.

These would normally be managed through a construction management plan as part of any detailed planning application.

If you are minded to allow this appeal, you might consider modifying condition C23 to require road safety measures such as Traffic Regulation Orders to reduce vehicle speeds and to control off-site parking **to be completed before ANY construction is permitted.**

The main impacts following occupation will be

- Additional traffic on Durrants Drive and Links Way
- Additional traffic at junctions with Baldwins Lane
- Additional traffic in the wider road network

PROPOSED MITIGATION MEASURES

I don't know whether the appellant's amended traffic analysis allows for the high levels of car ownership locally, but it shows the proposed development would have a clear and quantifiable impact at the road junctions already operating closest to capacity even with the proposed mitigation measures.

You may wish to consider why no further off-site mitigation (beyond the unsecured Travel Plan target) is proposed at junctions where the ratio of flow to capacity will be 0.85 or above.

The appellant proposes that the wider impacts of the development on the local highway network are to be mitigated through sustainable transport initiatives rather than offsite highway capacity improvements.

Whether the mitigation measures will work or not depends entirely on them being deliverable, properly designed, adequately funded, carefully monitored, and fully enforceable.

I suggest that you should test each of the proposed mitigation measures and that the conditions and obligations imposed should include clear, funded and enforceable mechanisms for addressing the consequences if any of them is not delivered as currently proposed.

Residents know that the local roads in Croxley Green, Rickmansworth, and Watford are already very congested at peak times delaying all vehicles, including the local bus services.

Therefore, it is essential that the Travel Plan is successful.

The applicants' Transport Assessment shows that, even if the Travel Plan is successful and achieves a 15% reduction in single occupancy car travel, it will not fully mitigate the traffic impacts from the proposed development.

The final travel plan should be as comprehensive and robust as possible with **annual targets for each mode of travel and with potential remedial measures included in the planning obligation to secure the Travel Plan.**

You might consider requiring a modification to the s106 agreement and/or Condition C28 so that:

- (i) The final Travel Plan sets annual, mode specific targets, (not solely a single occupancy car use target)
- (ii) A defined package of remedial measures is identified and costed in advance, to be triggered automatically if annual monitoring (using the proposed SAM/TRICS methodology) shows a shortfall and
- (iii) Those remedial measures are made enforceable through the planning obligation itself, consistent with paragraphs 6.1, 6.5 and 6.7 of Hertfordshire County Council's Travel Plan Guidance."

The safety case for cycling on the carriageway depends on the introduction of a 20mph zone between the site and Baldwins Lane. Hertfordshire County Council has confirmed the 20mph zone will need to cover a wider area, including most of the residential roads in Croxley Green. Traffic Regulation Orders are made under a separate procedure, requiring public consultation. Condition C23 requires the TRO to be approved before on-site works commence above slab level. This does not cover the risk that the TRO covering a wider area may be opposed or delayed or made in an amended form. Nor does it protect local residents during the early stages of construction.

You may wish to consider whether condition C23 should be modified to require any TROs to be approved and implemented before ANY construction commences on the site, to protect residents from the impacts of construction traffic.

Active Travel England identified pavement parking (with two wheels on the footway and two wheels on the carriageway) as a concern. Neither the draft conditions nor the s106 heads of terms appear to include any specific funded mechanism for controlling pavement parking or on street parking.

You may wish to seek confirmation how pavement parking enforcement will be funded and delivered and consider whether this should be addressed expressly within the s106 obligation, given its direct relevance to the safety of the proposed active travel infrastructure.

CONCLUSION

I would like to echo and endorse comments from other residents and councillors.

As well as measures on Durrants Drive and Links Way there will need to be further controls to prevent traffic diverting and rat running through inappropriate routes, including along Little Green Lane and via Lincoln Way past Little Green School and the planned Breakspear School. **These should be reserved as matters to be determined at any future detailed planning application and not determined at this application.**

The proposed additional bus service should be introduced at first occupancy and continued for at least 5 years AFTER the development is substantially complete – perhaps from 95% occupancy to ensure that it encourages people to use it. And it must be **additional to the existing services, not a replacement for them**. There should be a condition that, if existing services are withdrawn or reduced, the developer will provide additional funding to continue the existing services for at least 5 years after substantial completion.

It would be helpful to know that that the s106 agreement, including each transport and highway obligation, has been properly tested against Regulation 122(2) of the CIL Regulations 2010 and signed, rather than being accepted on the basis of the appellant's general willingness.

Thank you.

SUMMARY of **Essential Modifications to Conditions and s106 Obligations**

If you are minded to allow this appeal, the following conditions and Section 106 terms should be modified to ensure robust, enforceable protection:

- **Condition C23 (TROs & Construction Phase):** Currently, C23 only requires 20mph Speed and Parking TROs prior to works above slab level. To protect residents from heavy construction traffic and pavement parking hazards, all TROs must be formally approved and implemented **before any work on site commences**.
- **Condition C28 & s106 (Travel Plan Enforceability):** Even with a 15% reduction in single-occupancy vehicle trips, the developer's Travel Plan fails to fully mitigate traffic impacts. The s106 agreement should be amended to require:
 1. Annual, mode-specific travel targets (not just single-occupancy vehicle metrics).
 2. A pre-costed, defined package of remedial measures triggered automatically if annual SAM/TRICS monitoring reveals a shortfall.
 3. Full alignment with Paragraphs 6.1, 6.5, and 6.7 of Hertfordshire County Council's Travel Plan Guidance.
- **Pavement Parking Enforcement:** Active Travel England flagged pavement parking as a critical risk. A dedicated, funded enforcement mechanism should be secured explicitly within the s106 obligation to protect pedestrian and cycle safety.
- **Public Transport obligation:** The proposed additional bus service must be operational from first occupancy and guaranteed via developer subsidies for at least 5 years following 95% completion. It must supplement, not replace, existing local routes.

Further traffic control measures will be required to prevent traffic diverting and rat running through inappropriate routes, particularly along Little Green Lane, Lincoln Way, Rochester Way past Little Green School and the site of the planned new Breakspear School. **These should be reserved as matters to be determined at any future detailed planning application and not determined at this application.**

Every highway obligation should be tested rigorously against **Regulation 122(2) of the CIL Regulations 2010** and signed before permission is granted.