

Land North of Little Green Lane Croxley Green

Response to Third Party Comments

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1 INTRODUCTION

- 1.1.1 This technical note provides a response to issues raised by third parties during the Appeal, including those who were given the opportunity to speak at the Inquiry.
- 1.1.2 Rather than specifically addressing each individual's comments, I have combined them into relevant categories and provided a response to each accordingly.
- 1.1.3 The categories that I have addressed are as follows:
- Traffic Generation
 - Traffic Impacts
 - On-Street Parking; and
 - Sustainable Travel

2 TRAFFIC GENERATION

- 2.1.1 Many of the comments received mention the traffic that will be generated by the proposed development site, with some stating that the proposed 600 dwellings will produce "1200 plus cars" CD 14.26 (J King), or "the potential for 900 extra cars on our roads." CD 14.27 (Butler).
- 2.1.2 Mr Tett (CD 14.28) states that "Most houses have 2 cars per house so there will be an additional 1200 vehicles on the site, plus delivery vehicles and visitors to the site. Assuming that 75% of the residents' vehicles leave and return to the site each day, there will be 1800 vehicle movements per day leaving/entering the site."
- 2.1.3 In response to the above comments, it is worth noting that the Transport Assessment report (CD 2.12) utilised the industry standard TRICS database (which comprises actual traffic surveys of existing residential sites) to derive the traffic generation associated with the Appeal site.
- 2.1.4 The trip rates were refined during the course of the application and subsequently agreed with Hertfordshire County Council (as local highway authority), National Highways, Active Travel England (ATE) and Transport for London (TfL).
- 2.1.5 The agreed trip rates produced forecast trips to/from the residential dwellings at the Appeal site, during the morning and evening peak hours, of just over 300 two-way vehicle movements.
- 2.1.6 It is acknowledged that there will be traffic movements outside of the peak hours, but background traffic flows are significantly reduced across both the local and wider highway network, and thus testing of the traffic impact is undertaken for the peak hours to ensure a worst-case scenario assessment.

- 2.1.7 In respect to the c.300 two-way vehicle movements, these will be split between the two access routes into the site (Durrants Drive and Links Way), so at 150 vehicle movements per access this equates to just over two additional vehicle movements per minute along these routes in each peak hour.
- 2.1.8 These traffic movements have been assessed at both junctions with Baldwins Lane and the results accepted by the local highway authority.

3 TRAFFIC IMPACTS

- 3.1.1 In respect of the traffic impacts, comments have been made relating to the surveys that were undertaken, reliance on a reduction in trips through the implementation of the Travel Plan, and the current operation of the junctions to the south of the site.
- 3.1.2 In relation to the traffic surveys, Mr Tett (CD 14.28) states that *"The developers said in their October 2024 webinar that they would conduct traffic surveys: but these would only be relevant after the impact of the two previously mentioned developments."*
- 3.1.3 In response to this, it is worth noting that these developments have been accounted for in the traffic assessment work as 'committed development' sites and the assessment work undertaken in the Transport Assessment report (CD 2.12) is a cumulative assessment that includes all required committed development sites, and also includes background traffic growth on the highway network in addition to these.
- 3.1.4 Not only does this provide a robust assessment of the highway network, but as noted above, the assessment work has been agreed by the local highway authority, National Highways, ATE and TfL.
- 3.1.5 In relation to the comment made by Mr Grant (CD 14.30) that *"The development will see around a 12% increase in homes in Croxley Green and to make it sustainable it depends on a 15% reduction in single occupancy car travel."*, it should be noted that this is not the case made by the Appellant, nor is it the scenario that was relied upon in the Transport Assessment report.
- 3.1.6 Section 7.0 of the Transport Assessment report is titled 'Sensitivity Testing' and sets out the forecast impact of the development site, should the 15% reduction in development-related vehicular trips be realised (through the significant active travel measures and sustainable travel improvements being proposed).
- 3.1.7 As noted in paragraphs 7.13 to 7.18 of the Transport Assessment report, the planned active and sustainable travel improvements will benefit both residents of the proposed development site and existing residents, and that even modest reductions in vehicular trips would have a significant benefit on local junctions in terms of reductions in queues and delays.
- 3.1.8 Notwithstanding this, the 15% reduction is not relied upon to make the development acceptable; it is provided to demonstrate what could be achieved through the vision led approach and with mitigation measures aimed at sustainable and active travel improvements, rather than simply providing more highway network capacity.
- 3.1.9 This is exactly the approach that is required by national policy, as set out in the National Planning Policy Framework (NPPF, CD 8.2).
- 3.1.10 Finally, in respect of the impacts of the construction traffic movements, an assessment of these is provided in Section 5.0 of the Transport Assessment report, with the daily traffic generation during the construction period shown in Tables 8 and 9.

- 3.1.11 These flows will predominantly occur outside of peak periods on the local highway network and, as discussed at the Inquiry, will be controlled by a Construction Traffic Management Plan (CTMP) which will be conditioned.
- 3.1.12 A further condition is also proposed in respect of pre-development and post-construction dilapidation surveys, to address any adverse impacts caused by the construction traffic across the existing estate roads.

4 ON-STREET PARKING

- 4.1.1 Many of the third-party comments relate to the level of on-street parking across the existing estate roads and how this impacts traffic movements.
- 4.1.2 Comments have also been made in relation to the proposed traffic-calming/20mph zone scheme across the area, and how this would remove on-street parking through the provision of parking restrictions.
- 4.1.3 In response to the above, it is worth noting that the two primary roads leading up to the development site, Durrant Drive and Links Way, are wide single carriageway roads; as set out at paragraph 3.5 of the Transport Assessment report (CD 2.12), the carriageway widths of both are around 7.3m.
- 4.1.4 These are not narrow residential roads; as such, whilst on-street parking does impact traffic flows (as it does everywhere across the UK), I do not agree that it creates such significant congestion that the addition of the traffic associated with the proposed development would therefore be unacceptable. The local highway authority does not take this view either.
- 4.1.5 Some provision is being made for off-street parking bays to be provided, where space affords this; however, the inference in many of the comments (for example – Mr Wall, CD 14.29; Mr Grant, CD 14.30) is that the proposed 20mph and traffic-calming scheme will result in the removal of all on-street parking across the local estate roads.
- 4.1.6 This is not the case.
- 4.1.7 It is possible that reference that has been made to Traffic Regulation Orders (TROs) as part of this scheme has been interpreted to be double-yellow lines to remove all on-street parking; however, I can confirm that the creation of a 20mph zone with traffic-calming features and signage requires a TRO.
- 4.1.8 There will be some parking restrictions around junctions (double-yellow lines); however, this would not be expected to have a significant impact on the existing residents, on the basis that they should not be parking within 10m of a junction anyway (as set out in the Highway Code, at Rule 243).
- 4.1.9 As set out in the Committee Report (CD 4.2, pages 122 to 124 of the PDF), the reference to the 20mph zone makes no mention of parking restrictions across the wider estate roads, but rather to raised table junctions, lining and speed calming measures to facilitate safe cycling within the carriageway; the scheme proposals will be defined and detailed in due course, but the principle of them has been agreed with the local highway authority and ATE.

5 SUSTAINABLE TRAVEL

- 5.1.1 As noted above, the sustainable and active travel mitigation measures proposed by the development are significant and in accordance with national policy.

- 5.1.2 However, in terms of the bus service provision, a couple of comments have been made relating to the ability of buses to access the site, and the service provision itself.
- 5.1.3 In relation to these, it is worth noting that the service proposals have been prepared by Mr Handbury of Hertfordshire County Council, who has been in the bus industry since 1989; the majority of Mr Handbury's career has involved network planning, both on behalf of bus operators and now as part of the local authority.
- 5.1.4 The costing model used is conservative (i.e. it assumes a top-end operator such as Arriva would bid for the service, rather than a cheaper option that might be submitted by a smaller operator), but it is important to note that it assumes a midi-bus size (so up to 29 seats), rather than a full sized bus, the type of which operates along Baldwins Lane.
- 5.1.5 As such, concerns over the ability of the bus to access the site are unfounded.
- 5.1.6 Mr Jeremy Hollands, in his comments submitted to the Inquiry, stated that *"A much better option would be for the route to go via Watford General Hospital and possibly into Morrisons."*
- 5.1.7 However, we were advised by Mr Handbury that there is a requirement for this service to serve Watford Metropolitan Station, Watford Junction and Rickmansworth Stations; and, in doing so, the local authority advised the applicant that it would be unworkable to also serve the Hospital.
- 5.1.8 However, the hospital is already served by bus service 322, so the local authority did not see this as crucial in terms of the new service provision.