

Appeal Ref: APP/J1915/W/24/3340497

LAND TO THE EAST OF THE A10, BUNTINGFORD, HERTFORDSHIRE

Proof of Evidence – Transport & Highways



Appeal by Countryside Partnerships Ltd and Wattsdown Developments Ltd

Mehmet Ahmet BSc (Hons) MSc CMILT

East Hertfordshire District Council Reference: 3/23/1447/OUT

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APPLICATION REF: 3/23/1447/OUT

DATE: JUNE 2024

WSP

62-64 Hills Road

Cambridge

CB2 1LA

Phone: +44 1223 558 050

WSP.com

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EXECUTIVE SUMMARY

Planning application 3/23/1447/OUT was refused for a number of reasons, including which is relevant to the traffic and transport the second reason for refusal which states:

“The proposals represent an unsustainable form of development and residents and visitors would be heavily reliant on the private car to access employment, main food and comparison shopping elsewhere. The proposals do not amount to sustainable development (in accordance with the NPPF) and would result in a form of development outside of the settlement boundary that conflicts with the Development Strategy within the District Plan and objectives of the Buntingford Community Area Neighbourhood Plan. The proposal would be wholly contrary to Policies DPS2, INT1, BUNT1, BUNT3 and TRA1 of the East Herts District Plan (2018), policy HD1 of the Buntingford Community Area Neighbourhood Plan and the National Planning Policy Framework”.

My evidence specifically addresses the first main reason as set out in the Case Management Conference (the second reason for refusal), whether from a Transport perspective the appeal site would be a suitable location for residential development.

Hertfordshire County Council (HCC) Highways and Active Travel England (ATE), in their respective roles as local highway authority and government’s executive agency responsible for walking, wheeling and cycling, offer no objection to the proposed development scheme. Throughout our discussions with HCC Highways it was agreed that the arrangements on the general motor vehicle access onto the A10 only and direct sustainable transport access into central Buntingford via Luynes Rise and wider improvements begin to unlock the site sustainably and also encourages motor vehicle traffic to not add to any congestion within Buntingford itself. With the additional enhancements via contributions made to improving bus provision will only further enhance the sustainable location of the development.

We have successfully agreed a set of contributions for ensuring the improvements are made. HCC Highways operate two levels of S106 agreements, with items directly mitigating the impact of a development agreed through Strand 1 S106 agreement. Items mitigating the wider cumulative impact of development on non-car networks being addressed in a Strand 2 S106 agreement:

- Strand 1:
 - £162,000 pa for 5 years (enhance existing public transport provision)
- Strand 2:
 - £1,987,488 for 350 residential units and 104 employees

The general vehicle access to the development will be via a new roundabout onto the A10, Buntingford Bypass has been agreed. As default HCC Highways resists access on to a principal road unless special circumstances can be demonstrated. The access has been subject to the scrutiny of a Road Safety Audit (RSA) which identified no major safety concerns and through correspondence with HCC Highways most minor problems raised have been addressed and it is agreed any remaining issues will be addressed post planning through the detailed design process. HCC Highways also consider that allowing the site to be developed sustainably, without impacting substantially upon existing residents, this access is preferable and thus special circumstances have been demonstrated.

In addition, WSP prepared an initial design to provide a sustainable transport corridor along Luynes Rise and Aspenden Road. HCC has recommended amendments but are confident a suitable sustainable corridor can be delivered by S278. ATE also in agreement with the principle of the scheme to reduce speeds on this route. HCC agree that the proposed access arrangements (general motor vehicle access onto the A10 only and direct sustainable transport access into central Buntingford via Luynes Rise) will unlock the site sustainably and also encourages motor vehicle traffic to not add to any congestion within Buntingford. The A10 access also allows for bus services to loop through the town and around back through Luynes Rise rather than terminating at Greenways and turning at Baldock Road/A10 roundabout and beginning a new service.

The Proposed Development intends to provide for pedestrian and cycle access connections to public rights of way and provide linkages to routes leading into the town centre, schools and local facilities. The inclusion of a mobility hub will enhance existing pathways through the development and allow for easy access to surrounding towns and villages through sustainable means. The mobility hub will include bus stops, wayfinding points, electric vehicle charging points and a community lockable storage facility (for example, for parcel deliveries and returns). Access to nearby rail stations, such as Royston and Baldock Station is also possible by existing bus services or by the HertsLynx DRT system, which will integrate into the proposed mobility hub.

In terms of direct enhancements to the public transport we have agreed with HCC Highways that an appropriate bus route serving the development is possible and consider £810,000 contribution will be required to support an enhanced bus service. An indicative timetable has been shared following our productive discussions with HCC regarding bus access which shows an increase of bus service 18 to 12 services which connects with Royston which contains good transport links to London and Cambridge for employment purposes, as well as more amenities such as larger comparison shops, which people use less frequently.

1. INTRODUCTION

1.1. PERSONAL BACKGROUND

- 1.2. My full name is Mehmet Ahmet. I am a Transport Planner employed by, and currently holding the position of Technical Director, for WSP in the Cambridge Office. I am the Project Director for Land to the East of the A10, Buntingford, Hertfordshire and I am very familiar with the appeal site and its surrounding area.
- 1.3. I have over 20 years' professional experience, working extensively across the United Kingdom and also spent a number of years working in the Middle East and New Zealand, which I have gained knowledge in both the private and public sectors.
- 1.4. Other projects I am currently providing advice on is for East West Rail (EWR) on the Oxford to Cambridge Rail project on matters related to accessibility and Door to Door connectivity. A key role in enabling more people to access the connectivity provided by the EWR scheme, supporting the purpose of connecting people I was also involved advising on the White City Masterplan, West London on Imperial Colleges' 9.3 hectare development plans on the integrating the extensive walking/cycling facilities.
- 1.5. I hold a Masters Degree in Transport Planning and Engineering from Edinburgh Napier University and I am a Chartered Transport Planner of the Chartered Institute of Logistics and Transport. I am also a member of the Transport Planning Society.
- 1.6. My evidence specifically addresses the first main reason as set out in the Case Management Conference (the second reason for refusal), whether from a Transport perspective the appeal site would be a suitable location for residential development.
- 1.7. I confirm that the opinions I have expressed in my proof of evidence are true and professional opinions.

1.8. DESCRIPTION OF DEVELOPMENT PROPOSALS

- 1.8.1. The Transport Assessment (TA) submitted in support of the planning application is to support a development on land east of the A10, Buntingford, Hertfordshire, SG9 ('Buntingford West'), comprising:
- An outline planning application (with all matters reserved except access) for the development of 350 residential dwellings (Use Class C3), a new highway junction from the A10 and other associated works including drainage, access roads, allotments, public open space and landscaping; and
 - An outline planning application (with all matters reserved) for up to 4,400 sqm of floorspace (Use Class E and B8), a local centre with up to 500 sqm of retail floorspace (Use Classes E (a)(b)(c)).
- 1.8.2. The site is located to the west of Buntingford, Hertfordshire, and is bounded to the north and east by existing development and to the south and west by the A10.
- 1.8.3. The development proposals seek to deliver with sustainability at the heart of the design. The proposals provide a mixed-use development to promote trip internalisation, upgrade of existing footways through the site plus additional connections to improve the site's permeability. The design of the scheme is
-

such that it adopts the Liveable Neighbourhood and 20 Minutes Homes concepts and uses measures to encourage sustainable travel.

- 1.8.4. A series of incentives to encourage future occupants to travel by sustainable modes of transport will be provided as part of the development scheme. Those measures, to be secured by planning condition and S106 and S278 agreements which are described in later sections in my proof of evidence.

1.9. LOCAL HIGHWAY NETWORK

- 1.9.1. A plan illustrating the various roads referred to in my proof of evidence is enclosed at **Appendix A**.

1.10. THE POSITION OF HERTFORDSHIRE COUNTY COUNCIL

- 1.10.1. Hertfordshire County Council (HCC) Highways and Active Travel England (ATE), in their respective roles as local highway authority and government's executive agency responsible for walking, wheeling and cycling, offer no objection to the proposed development scheme.
- 1.10.2. The consultation responses received from HCC and ATE are enclosed at **Appendix B** and **Appendix C** respectively. I provide a response to both in **Section 3** in my proof of evidence.

1.11. THE POSITION OF THE EAST HERTS DISTRICT COUNCIL

- 1.11.1. East Herts District Council (EHDC), acting in its role of planning authority, has provided the following putative reason for refusing planning consent:
- The proposal represents an unsustainable form of development and residents and visitors would be heavily reliant on the private car to access employment, main food and comparison shopping elsewhere; and
 - EHDC also state that the development is contrary to NPPF in the form that the proposal do not amount to sustainable development.
- 1.11.2. Further assessment of EHDC refusal is made in **Section 6** of my evidence.

1.12. TRANSPORT ASSESSMENTS AND TRAVEL PLANS

- 1.12.1. In my evidence I have referred to the Transport Assessment and Travel Plan. The documents referred to are:
- Transport Assessment incorporating RSA and Designers Response (WSP, July 2023) (Core Document 1.26)
 - Travel Plan - Commercial (WSP, June 2023) (Core Document 1.18)
 - Travel Plan – Residential (WSP, June 2023) (Core Document 1.19)
 - Travel Plan – Retail (WSP, June 2023) (Core Document 1.20)

1.13. SCOPE OF EVIDENCE

- 1.13.1. WSP is providing Highways & Transport evidence at this Appeal. I am providing evidence relating to Highways & Transport.

1.13.2. My evidence is structured as follows:

- **Section 2** outlines current transport related planning policy;
- **Section 3** describes the consultation responses received from HCC and ATE;
- **Section 4** analyses the second reason for refusal by East Herts District Council;
- **Section 5** summary of the 2023 Transport Assessment and Framework Travel Plans for the commercial, residential and retail;
- **Section 6** describes sustainability measures for the proposed development and considers the appeals site's accessibility; and
- **Section 7** outlines my summary and conclusions.

2. TRANSPORT RELATED PLANNING POLICY

2.1. INTRODUCTION

- 2.1.1. This section outlines existing policy documents on a national, regional and local level. It describes how the requirements of these policies will be satisfied by the Buntingford West development.
- 2.1.2. At national level, policy is provided by the National Planning Policy Framework (NPPF) (July 2021) and its supporting National Planning Practice Guidance (NPPG). At a regional level, policy is provided by Hertfordshire County Council's Local Transport Plan (LTP4, May 2018). At a more localised level, policy is more provided by the East Herts District Plan (2018) as well as supporting documents such as East Herts Sustainability SPD (2021).
- 2.1.3. The NPPF, PPG, HCC Local Transport Plan and District Plan are considered in turn below.

2.2. NPPF (DECEMBER 2023)

- 2.2.1. The NPPF (Core Document 5.1) describes the Government's planning policies for England and how those are expected to be applied. The NPPF has a presumption in favour of sustainable development, which is defined as development that meets the needs of the present without compromising the ability of future generations to meet their own needs. The NPPF emphasises plan-making and decision-taking within Local Planning Authorities (LPAs). This sets to establish plans which satisfy the housing requirement in their area.

- 2.2.2. Paragraph 114, chapter 9, pages 32-33 states:

In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users; and*
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*

- 2.2.3. I consider that the development proposals comply fully with the requirements of paragraph 114. As I describe in later sections of my evidence, the location of the appeal site will allow for the take up of sustainable modes of travel by its future occupants. Safe and suitable access will be achieved by all users. And the impact of development on the transport network will be mitigated to an acceptable degree. When setting parking standards for residential and non-residential developments maximum parking standards should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport.

2.2.4. Paragraph 116, chapter 9, page 33 states:

Within this context, applications for development should:

- a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;*
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles; and*
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.*

2.2.5. I consider that the development proposals comply fully with the requirements of paragraph 116. The transport facilities to be provided have been designed to accord with a hierarchy of movement, whereby priority is given to the needs of pedestrians followed by the needs of cyclists, users of public transport and finally those using the motor car. The facilities have been designed to be as inclusive as practicable in order not to exclude persons with reduced mobility.

2.2.6. Paragraph 117, chapter 9, pages 33-34 states:

“All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”.

2.2.7. The planning application for the development has been supported by a Framework Travel Plans for the residential, retail and commercial space, and a Transport Assessment. The contents of those documents are outlined later in my evidence and these will be secured by planning condition.

2.2.8. In summary, the development proposals at Buntingford comply fully with the sustainable travel requirements of the NPPF.

2.3. NATIONAL PLANNING PRACTICE GUIDANCE

2.3.1. NPPG (PPG) is a component of the NPPF (Core Document 5.1). PPG provides guidance on a number of planning matters. The section ‘Transport Evidence Bases in Plan Making and Decision Taking’, March 2015 specifically address transportation planning issues and Chapter 9 of the NPPF.

2.3.2. The ‘Transport Evidence Bases In Plan Making and Decision Taking’ section of the PPG (Core Document 5.2) places responsibility on Councils to prepare ‘off the shelf’ Transport Assessments to speed up the planning process and aid development. However, it does recognise that there will be instances when a ready-made plan is not available (‘Travel plans, transport assessments and statements in decision-taking’) and ‘it may also be useful in plan-making if local planning authorities are of the view that Transport Assessments can beneficially inform their Local Plans (for example, in order to facilitate the use of sustainable modes of transport).’

2.3.3. The section 'Travel plans, transport assessments and statements in decision-taking' in the PPG hence, expands slightly on the 'Overarching Principles on Travel Plans, Transport Assessments' and additionally expands on their content in subsequent sections of the document.

2.4. HERTFORDSHIRE COUNTY COUNCIL LOCAL TRANSPORT PLAN (LTP4, MAY 2018)

2.4.1. In terms of policies, the following are considered most pertinent to this site (Core Document 16.1, chapter 2, page 45).

Policy 1: Transport User Hierarchy

To support the creation of built environments that encourage greater and safer use of sustainable transport modes, the county council will in the design of any scheme and development of any transport strategy consider in the following order:

- *Opportunities to reduce travel demand and the need to travel*
- *Vulnerable road user needs (such as pedestrians and cyclists)*
- *Passenger transport user needs*
- *Powered two-wheeler (mopeds and motorbikes) user needs*
- *Other motor vehicle user needs*

Policy 5: Development Management (Core Document 16.1, chapter 6, page 53)

The county council will to work with development promoters and the district and borough councils to:

a) Ensure the location and design of proposals reflect the LTP Transport User Hierarchy and encourage movement by sustainable transport modes and reduced travel demand.

b) Ensure access arrangements are safe, suitable for all people, built to an adequate standard and adhere to the county council's Highway Design Standards.

c) Consider the adoption of access roads and internal road layouts where they comply with the appropriate adoption requirements and will offer demonstrable utility to the wider public. Where internal roads are not adopted the county council will expect suitable private management arrangements to be in place.

d) Secure developer mitigation measures to limit the impacts of development on the transport network, and resist development where the residual cumulative impact of development is considered to be severe.

e) Require a travel plan for developments according to the requirements of 'Hertfordshire's Travel Plan Guidance'.

f) Only consider new accesses onto primary and main distributor roads where special circumstances can be demonstrated in favour of the proposals.

g) Resist development that would either severely affect the rural or residential character of a road or other right of way, or which would severely affect safety on rural roads, local roads and rights of way especially for vulnerable road users. This should include other routes which are important for sustainable transport or leisure.

h) Ensure that any new parking provision in new developments provides facilities for electric charging of vehicles, as well as shared mobility solutions such as car clubs and thought should be made for autonomous vehicles in the future.

2.5. EAST HERTS DISTRICT PLAN (2018)

2.5.1. **Section 6** of the document details the development strategy for Buntingford (Core Document 4.1, chapter 6, page 79), which includes:

- **Housing** - additional homes will be provided which will consist of a mix of dwelling types and sizes, including bungalows and specialist retirement accommodation, to ensure that Buntingford's population is able to access a balanced housing market catering for all life stages. The provision of affordable housing as part of new residential and mixed-use development schemes will allow emerging households to be able to remain living in Buntingford in accommodation suited to their needs
- **Transport** - as part of development proposals for the town, bus services will be enhanced to support travel around the town and to provide links to neighbouring towns. Financial contributions towards the implementation of a Community Transport project have been secured from some of the approved development schemes in the town which will, once established, provide a valuable service to the residents of the town and neighbouring villages. New developments will encourage the use of sustainable travel modes through the enhancement of walking and cycling links around the town. The impact of development on the local road network will be mitigated through upgrades to existing junctions, including widening of the exit links at the A10/London Road roundabout.
- **Employment and Retail** - the large rural hinterland surrounding the town makes Buntingford an ideal base for small businesses that have links to the town itself rather than those that rely on a proximity to major road networks.

2.5.2. Policy TRA1 'Sustainable Transport' states (Core Document 4.1, chapter 18, pages 244-245):

To achieve accessibility improvements and promotion of sustainable transport in the district, development proposals should:

- *Primarily be located in places which enable sustainable journeys to be made to key services and facilities to help aid carbon emission reduction;*
- *Where relevant, take account of the provisions of the Local Transport Plan;*
- *Ensure that a range of sustainable transport options are available to occupants or users, which may involve the improvement of pedestrian links, cycle paths, passenger transport network (including bus and/or rail facilities) and community transport initiatives.*
- *Ensure that site layouts prioritise the provision of modes of transport other than the car (particularly walking, cycling and, where appropriate, passenger transport) which, where feasible, should provide easy and direct access to key services and facilities;*
- *In the construction of major schemes, allow for the early implementation of sustainable travel infrastructure or initiatives that influence behaviour to enable green travel patterns to become established from the outset of occupation; and*
- *Protect existing rights of way, cycling and equestrian routes (including both designated and non-designated routes and, where there is evidence of regular public usage, informal provision).*

2.5.3. I consider the development proposals are consistent with regard to both policies HCC LTP4 and TRA1, insofar that provision of all modes have been accommodated for within the development proposal, inclusion for walk, cycle, bus and rail and not limited to the car only. This is also further evidenced by HCC 'no objection' to our proposals. Through the design development our proposals also provides access to Luynes Rise, a bus, pedestrian and cycle access which was fully supported by HCC and again consistent with policy TRA1. In addition, the Framework Travel Plans will be developed and incorporated from the outset so to ensure the correct travel behaviours are encouraged right from first occupation.

2.6. SUMMARY

- 2.6.1. The focus of national, regional, and local transport policy is to locate residential development in locations that provide good accessibility to local services by foot and bicycle, provide good access to public transport services and where the local road network can accommodate the residual vehicle trip generation of the proposed scheme without resulting in a severe transport impact. Policy promotes walking, cycling and public transport in preference to car use, particularly single occupancy car use.
- 2.6.2. I consider the development proposals at Buntingford West to be in line with policy objectives. Most specifically relating to HCC LTP Policy 1 (Core Document 16.1, chapter 1, page 45) & NPPF paragraph 116, as both local design and active travel provision is provided as part of the proposal (Core Document 5.1, chapter 9, page 33).
- 2.6.3. Car parking, including EV infrastructure, and cycle parking will be provided in line with the Local Planning Authority's standards and compliant with Policy 5 of the HCC LTP (Core Document 16.1, chapter 5, page 53) and paragraphs 111 and 112 of the NPPF (Core Document 5.1, chapter 9, page 32).
- 2.6.4. The internal highway designs and layout will be provided at the reserved matters stage and will be designed to be compliant with NPPF paragraphs 114 (Core Document 5.1, chapter 9, pages 32-33) and the full document compliance for Roads in Hertfordshire: Highways Design Guide Standards for highway design and refuse/emergency vehicle access (Core Document 16.3).
- 2.6.5. The appeal site demonstrates compliance with EHDC Policy TRA1 evidenced by HCC's "no objection" to the appeal site based on access to key services. The development also maintains and upgrades the existing footways within the site and provides walking and cycling connection between Aspenden and Buntingford via the proposed access on Luynes Rise which connects to the active travel infrastructure proposed on London Road/Station Road. This demonstrates the development prioritises the provision of active travel compared to the private car.
- 2.6.6. In conclusion, the development meets the requirements of the NPPF, in that it provides safe and enhanced access for all users and will not negatively impact on the operation of the local highway or sustainable network. The residual transport impact is not considered severe in the context of NPPF.

3. CONSULTATION RESPONSES FROM HERTFORDSHIRE COUNTY COUNCIL AND ACTIVE TRAVEL ENGLAND

3.1. INTRODUCTION

- 3.1.1. The highway matters agreed in relation to the content of the submitted Transport Assessment (0910-57/TA/01) and are set out below. HCC's full response is attached at **Appendix B** and ATE's Response at **Appendix C**.

3.2. ACCESS AND CONNECTIVITY

GENERAL VEHICLE ACCESS

- 3.2.1. The general vehicle access to the development will be via a new roundabout onto the A10, Buntingford Bypass. As default HCC Highways resists access on to a principal road unless special circumstances can be demonstrated. The access has been subject to the scrutiny of a Road Safety Audit (RSA) which identified no major safety concerns and through correspondence with HCC Highways most minor problems raised have been addressed and it is agreed any remaining issues will be addressed post planning through the detailed design process. HCC Highways also consider that allowing the site to be developed sustainably, without impacting substantially upon existing residents, this access is preferable and thus special circumstances have been demonstrated. Subject to detailed design HCC Highways accepts the principle of the proposed A10 access.

SUSTAINABLE TRAVEL ACCESS ON TO LYNES RISE AND ASPENDEN ROAD

- 3.2.2. WSP prepared an initial design to provide a sustainable transport corridor along Luynes Rise and Aspenden Road. HCC has recommended amendments and are confident a suitable sustainable corridor can be delivered by S278. ATE agrees with the principle of the scheme to reduce speeds on this route.
- 3.2.3. It is envisaged that the design could entail the following:
- Vertical deflection to ensure sub 20mph vehicle speeds are achieved and a 20mph TRO to enforce;
 - Deliver tighter junctions through build outs at Luynes Rise/ Aspenden Road, Nut Slip/ Aspenden;
 - Road and Aspenden Road/ London Road;
 - Reversed Traffic Priorities at the Luynes Rise/ Aspenden Road junction, giving priority to users of the Sustainable Transport corridor (buses and cyclists) and ensuring that industrial traffic and other entering the village along Aspenden Road have to cede priority;
 - Entry treatment for Aspenden Road at London Road;
 - A Toucan crossing of London Road near Aspenden Road; and
 - A Positive connection to the Active Travel Funded scheme on the eastern side of London Road.

- 3.2.4. HCC agree that the proposed access arrangements (general motor vehicle access onto the A10 only and direct sustainable transport access into central Buntingford via Luynes Rise) will unlock the site sustainably and also encourages motor vehicle traffic to not add to any congestion within Buntingford itself. The A10 access also allows for bus services to loop through the town and around back through Luynes Rise rather than terminating at Greenways and turning at Baldock Road/A10 roundabout and beginning a new service.

WIDER CONNECTIONS

- 3.2.5. HCC and ATE acknowledge the opportunities presented on plan to provide a potential scheme for wider connection. HCC and ATE agrees with the principle of the improvements but recommends the schemes to be delivered by the developer are secured through a Section 278 agreement with the highway authority, to ensure timely and cost-effective delivery.
- 3.2.6. Whilst this delivery mechanism is acceptable, it was also agreed that a revised Strand 2 contribution will be calculated if the applicant commits to any off-site works that provides a wider benefit.

3.3. PARKING

CAR PARKING

- 3.3.1. The EHDC Vehicle Parking Standards (Core Document 5.6, vehicle parking standards 2015 update, page 2) which is zonal based and recommends 75-100% of the standard in Buntingford was utilised in calculating the parking provision. As a hard measure to encourage sustainable travel, a 79% residential parking and 75% commercial parking (based in TRICS vehicle arrival/departure assessment) was proposed. HCC Highways considered that this is an appropriate level for residential and commercial car parking.

CYCLE PARKING

- 3.3.2. HCC and ATE accepts the proposed residential and commercial cycle parking provision. HCC and ATE expects that at the detail design stage, a parking scheme be developed to ensure cycle parking is located in the correct area and is of the correct standard to encourage its use.

3.4. TRAVEL PLAN

- 3.4.1. HCC Highways Travel Plan team considered the presented Travel Plans (Commercial and Residential) acceptable at this stage in the planning process, they indicate post planning, further details will be required to discharge planning condition. ATE would like to see included within the Travel Plan, details of remedial measures.

3.5. ROAD TRAFFIC ANALYSIS

- 3.5.1. HCC Highways considered the proposed approach to trip generation, mode split, traffic distribution and assignment, base traffic data assessment, traffic growth assumptions and traffic impact assessment acceptable.

3.6. CONTRIBUTION

3.6.1. HCC Highways operate two levels of S106 agreements, with items directly mitigating the impact of a development agreed through Strand 1 S106 agreement and those items mitigating the wider cumulative impact of development on non-car networks being addressed in a Strand 2 S106 agreement:

- Strand 1:
 - £162,000 pa for 5 years (enhance existing public transport provision)
- Strand 2:
 - £1,987,488 for 350 residential units and 104 employees

3.6.2. It is worth noting that unlike other developments, HCC have not provided a spend schedule to understand what the above contributions will be supporting but it is understood through our discussions with HCC the S106 contribution allocation will be used towards sustainable, active and accessibility improvements within Buntingford

Public Transport

3.6.3. HCC Highways consider that an appropriate bus route serving the development is possible and consider £810,000 contribution will be required to support an enhanced bus service.

3.6.4. The £810,000 contribution will be a ringfenced amount and HCC have agreed a 55% reduction which will be applied to the total Strand 2 contribution of £2,432,988 (£445,500). This is due to benefits of an enhanced bus service to Buntingford and the wider network. Therefore, the total Strand 2 contribution will be £1,987,488 (£2,432,988- £445,500)

4. EAST HERTS DISTRICT COUNCIL STATEMENT OF CASE

4.1. INTRODUCTION

4.1.1. The second reason for refusal reports that the proposal represents a unsustainable form of development and residents and visitors would be heavily reliant on the private car to access employment, main food and comparison shopping.

Reason for Refusal No 2

4.1.2. The second reason for refusal states:

“The proposals represent an unsustainable form of development and residents and visitors would be heavily reliant on the private car to access employment, main food and comparison shopping elsewhere. The proposals do not amount to sustainable development (in accordance with the NPPF) and would result in a form of development outside of the settlement boundary that conflicts with the Development Strategy within the District Plan and objectives of the Buntingford Community Area Neighbourhood Plan. The proposal would be wholly contrary to Policies DPS2, INT1, BUNT1, BUNT3 and TRA1 of the East Herts District Plan (2018), policy HD1 of the Buntingford Community Area Neighbourhood Plan and the National Planning Policy Framework”.

4.1.3. East Herts state more fully that:

- The appeal site is located in the countryside and for this quantity of housing and commercial floorspace, and with a lack of reasonable proximity and limited access to services and facilities.
- The occupiers of the proposed development would be over reliant on the use of the private car.
- The Council does not consider the proposals to constitute a sustainable form of development in the context of the settlement and its remote location within the district.

4.1.4. My proof of evidence will provide further clarity and evidence that from a transport planning and accessibility perspective that the site is located in a sustainable location and grounds for refusal are not apparent.

5. TRANSPORT ASSESSMENT AND FRAMEWORK TRAVEL PLANS

5.1. INTRODUCTION

5.1.1. My proof of evidence describes at length the various highways and transport matters associated with the proposed development site. Before I describe those matters in detail, I have provided the following résumé which summarises the Applicant's case on transport matters.

5.1.2. This section briefly describes the 2023 Transport Assessment and the 2023 Framework Residential Travel Plans which have been prepared in support of the 2022 hybrid application and the 2023 outline application on land east of the A10, Buntingford, Hertfordshire, SG9 ("Buntingford West").

Transport Assessment

5.1.3. The 2023 Transport Assessment report was submitted as part of a full planning application for the development of 350 residential dwellings (Use Class C3), a new highway junction from the A10 and other associated works. As well as an outline planning application for up to 4,400 sqm of floorspace (Use Class E and B8), a local centre of up to 500sqm of retail floorspace (Use Classes E).

Site Access

5.1.4. Vehicular access to the Appeal Site is to be provided via a new roundabout junction from the A10 following advice given by HCC Design Review Panel and the Strategic Transport Infrastructure Board (STIB) and a secondary (bus, pedestrian, cycle and emergency only) access is also proposed from Luynes Rise. The PROW are key existing sustainable link to the town centre and provides a direct connection with proposed works to be undertaken as part of a package of active travel improvements via a Section 278 agreement with HCC from the Appeal Site on Luynes Rise/Aspenden Road.

Sustainable Location

5.1.5. It is considered that the development site is located in a highly accessible location. Future residents of the proposed development will have good access to local facilities on foot and by bicycle. They will be able to take advantage of local bus services which can be accessed from bus stops on the appeal site and nearby bus stops. Access onto the A10 allows for bus services to loop through central Buntingford and around back through Luynes Rise and resuming its current path via London Road/Hare Street. The bus link will help to unlock the sustainability of the site by providing residents the opportunity to travel sustainably and get in the habit of doing so. As part of the sustainable transport initiatives, a mobility hub will be located on the site. This will include wayfinding points, electric vehicle rapid charging point and community lockable storage.

Enhancing Sustainability

5.1.6. Housing will be designed with home working in mind. Home working would take away the need to commute on a daily basis. The Covid-19 pandemic has demonstrated that a sizeable majority of the UK's working population can work effectively from home. The appeal site has been developed to support home working with a working hub to be located in the Local Centre as well as the availability of ultrafast fibre optic broadband for the development which can be provided by Gigaclear and other fibre optic service providers.

- 5.1.7. The development's layout will be designed to provide footway and cycle routes which connect with existing walking and cycling facilities. The layout will be designed to provide a low-speed environment which prioritises walking and cycling ahead of vehicle traffic.

Bus Service Contribution

- 5.1.8. HCC propose to implement an enhanced bus service, HCC have confirmed they have reviewed all bus services and chosen the 18 service as requiring improvement.
- 5.1.9. The 18 service Buntingford – Royston will operate to a new and increased frequency timetable. It will run a general hourly frequency from early morning through to early evening. There are some deviations with the initial morning service starting at 1 hour 25 minutes and the evening services having slightly shorter intervals. The service will operate 6 days per week, with a lower frequency operating on Saturday. The new bus service will provide a direct service from Buntingford Luynes Rise to Royston Railway Station, the travel time for this journey will typically take 42 minutes with the exception of the first and last service. Royston station is part of the Great Northern Route and provides good access links to London Kings Cross and Cambridge. Further information on the timetable is provided in **Section 6** of my proof.
- 5.1.10. The enhanced bus service will provide an attractive and useful service to new residents and the wider community by connecting them to key towns, villages and employment sites. It will capitalise on the benefits provided by the mitigation by other developments such as the Pigeon development, adjacent to the Redrow Development at north Buntingford, to provide a reliable service in the peak periods.

Statements of Common Ground

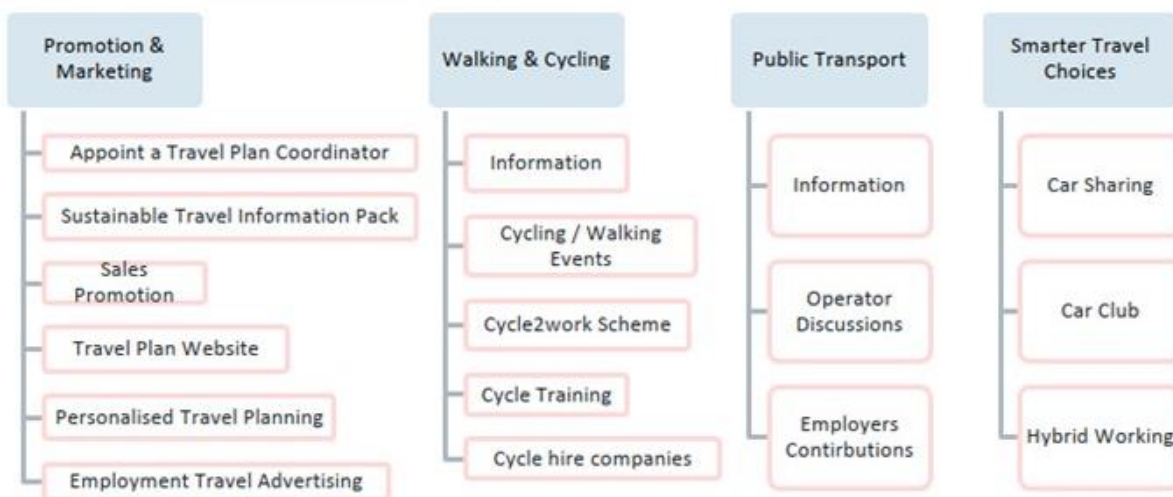
- 5.1.11. The transport matters described above have been confirmed by the Statements of Common Ground which have been agreed and signed by HCC.

5.2. FRAMEWORK TRAVEL PLANS

- 5.2.1. In 2023 three Framework Travel Plans (June 2023) (Core Documents 1.18-1.20) were submitted as part of the outline application on land east of the A10, Buntingford, Hertfordshire, SG9 ("Buntingford West"). I have briefly outlined below the key aspects of these travel plans.
- 5.2.2. A travel plan is a long-term management strategy for a development that seeks to deliver sustainable transport objectives through action and is articulated in a document that is regularly reviewed. A travel plan provides the "soft" measures" which aim to encourage future residents to travel by sustainable modes of transport. It sits beside the "hard" physical transport measures which will be implemented to allow sustainable travel to take place, Framework Travel Plans (FTP) have outlined how the development will achieve a sustainable mode share with identifiable travel targets. The development includes a mix of residential, retail, and commercial space, creating the potential for trip internalisation.
- 5.2.3. The retail, residential and commercial elements of the appeal site has been produced in line with Hertfordshire County Council's (HCC) Travel Plan Guidance (March 2020) as recommended in Chapter 18 of the East Hertfordshire District Council (EHDC) Local Plan. As well as EHDC Policy TRA1 to ensure the appeal site achieves accessibility improvements and the promotion of sustainable transport in the district.

- 5.2.4. Ideally, a single Framework Travel Plan (FTP) would be required to support this application as it is in outline and the end users of the commercial and retail elements are unknown. However, following HCC's comments on the previous application, three separate Travel Plans by land have been prepared to support this application. The commercial FTP should be read alongside the Residential Framework Travel Plan, Retail Framework Travel Plan and the accompanying Transport Assessment which has been prepared separately to assess the potential impacts of future growth and the proposed development on the local transport infrastructure.
- 5.2.5. The monitoring process of these FTPs will include a questionnaire-based survey to be completed by occupiers at regular intervals as well as recording membership and sign up rates to TP measures, including walking and cycling groups and car share schemes. Travel measures will be implemented from the outset of development to ensure that residents are able to adopt sustainable forms of travel.
- 5.2.6. **Figure 5-1** - Summary of measures for the FTPs provides a provides a summary of the measures that will be implemented for the proposed development to capitalise on the sustainable travel opportunities.

Figure 5-1 - Summary of measures for the FTPs



- 5.2.7. Evidence from other developments indicates that these measures are effective in persuading residents to adopt non-car forms of travel.

6. DELIVERING SUSTAINABLE DEVELOPMENT

6.1.1. There has been a significant level of residential development in Buntingford in recent years. EHDC Policy BUNT1 outlines locations and specific sites in Buntingford for housing developments, the policy sets out targets for new housing to ensure growth is managed. BUNT1 sites add up to 1,074 dwellings plus a further 32 at Aspenden Road since 2018. EHDC has also granted permission for the Pigeon outline scheme at North Buntingford (58 homes), which takes the total number of dwellings to 1,164 permissions (Core Document 4.1, chapter 6, page 78). There is no doubt that development in Buntingford is an accepted location for new housing and employment development.

6.1.2. The preceding section of my proof has outlined the development site's already excellent accessibility to a range of local facilities.

6.2. PROVISION OF TRANSPORT IMPROVEMENTS

6.2.1. The development site is presently served by existing services which provide north-south and east-west connections. These services are shown in **Table 6-1** - Local Bus Services (as of January 2022) below. These services are currently financed by HCC.

Table 6-1 - Local Bus Services (as of January 2022)

Bus Stop	Bus Number	Route	Frequency		
			Mon - Fri	Saturday	Sunday
Buntingford, opp Greenways	18	Royston - Buntingford	5 per day	4 per day	No Service
		Buntingford - Royston	6 per day	4 per day	No Service
Buntingford, opp Greenways	331	Buntingford – Hertford	Hourly	Hourly	No Service
		Hertford – Buntingford	Hourly	Hourly	No Service
Buntingford, opp Greenways	386	Buntingford – Bishops Stortford	4 per day	5 per day	No Service
		Bishops Stortford - Buntingford	4 per day	5 per day	No Service
Buntingford, opp Greenways	386	Buntingford – Stevenage	4 per day	4 per day	No Service
		Stevenage - Buntingford	4 per day	4 per day	No Service

6.2.2. It has been agreed that the proposed development will make a financial contribution of £810,000 to HCC for bus services serving Buntingford. The financial contributions described above once secured will ensure that HCC can begin to operate the enhanced bus service with confidence that its viability will be secure in the longer term.

6.2.3. The enhanced 18 bus service will provide an attractive and reliable service to new residents which will help to connect them to key towns, villages and employment sites at more attractive frequencies. For example, linking Buntingford to the larger town of Royston which contains good transport links to London and Cambridge for employment purposes, as well as more amenities such as larger comparison shops, which people use less frequently. The 18-bus service also serves smaller communities such as those in Barley, Chipping and Buckland. The example timetable produced by HCC is provided in **Table 6-2** – Local Bus Services Enhancement 18.

Table 6-2 – Local Bus Services Enhancement 18

Bus Stop	Bus Number	Route	Frequency		
			Mon - Fri	Saturday	Sunday
Buntingford, opp Greenways	18	Royston - Buntingford	12 per day	12 per day (reduced service)	No Service
		Buntingford - Royston	12 per day	12 per day (reduced service)	No Service

- 6.2.4. It is worth noting that the enhanced bus service will provide a significant benefit, not just to future residents, but also existing residents living in Buntingford and elsewhere along its route. It is also worth noting that, without the sizeable contribution to be provided by the proposed development, it is unlikely that HCC will have sufficient funding to launch an enhanced service for Buntingford.
- 6.2.5. The Proposed Development intends to provide for pedestrian and cycle access connections to public rights of way and provide linkages to routes leading into the town centre, schools and local facilities. The inclusion of a mobility hub will enhance existing pathways through the development and allow for easy access to surrounding towns and villages through sustainable means. The mobility hub will include bus stops, wayfinding points, electric vehicle charging points and a community lockable storage facility (for example, for parcel deliveries and returns). Access to nearby rail stations is also possible by existing bus services or by the HertsLynx DRT system, which will integrate into the proposed mobility hub.
- 6.2.6. The HertsLynx service has demonstrated significant success, surpassing its one-year target of 12,000 trips within ten months as referenced by Kubitz, B (2022) in article Transportxtra on the successes of DRT schemes which was specifically focused on the HertsLynx service. As well as this, two additional minibuses have been launched, the service was extended from Hertford to Ware in December 2023 and HCC are now launching the service elsewhere in the County in Dacorum and Three Rivers from April 2024.
- 6.2.7. Recent planning proposals have sought to further enhance the Herts Lynx service and infrastructure. This includes the 23rd of November 2023 grant of permission (3/23/1316/CPO) for the change of use of the former Buntingford Recycling Centre to be used for the parking and charging of electric vehicles for HertsLynx. As well as the installation of associated electric vehicle charging and re siting of an existing portacabin. There is also a current planning application 3/24/0964/CPO (20th May 2024) for the installation of portacabins for use by the drivers of HertsLynx.
- 6.2.8. The success of the HertsLynx service demonstrates the potential for a demand responsive bus service to complement an enhanced traditional bus service both serving the appeal site. Contributions made under Strand 1 and 2 could be used to support further improvements to HertsLynx or other bus services that serve Buntingford. This will further enhance accessibility for future residents of the appeal site.

6.3. TRAVEL PLANS

- 6.3.1. As described earlier in my proof, the 2023 Framework Travel Plans for each element of the development has been submitted as part of the planning application a summary of which has been provided in **Section 5**.
- 6.3.1. Our key focus of consideration as discussed with HCC was to ensure a sustainable transport strategy for the site was at the heart of the proposals. This includes the implementation of suitable walking and cycling links to connect to the wider area, alongside encouraging public transport use through integration with services such as HertsLynx to enhance the public transport accessibility of the site.
- 6.3.2. The location of the site affords it a rare opportunity to encourage sustainable travel to the non-residential elements of the development and also for residents to travel to locations within acceptable walking and cycling distances.
- 6.3.3. With the proposed non-vehicular connection to the site from the immediate vicinity, vehicular trips which could be attracted to the development could now be shifted to active travel or micro mobility alternatives, thereby providing a positive impact on the existing network.

6.4. ACCESSIBILITY

- 6.4.1. The Proposed Development intends to provide for pedestrian and cycle access connections to public rights of way and provide linkages to routes leading into the town centre, schools and local facilities. The inclusion of a mobility hub will enhance existing pathways through the development and allow for easy access to surrounding towns and villages through sustainable means. The mobility hub will include an existing and enhanced bus service, wayfinding points, electric vehicle charging points and a community lockable storage facility (for example, for parcel deliveries and returns). Access to nearby rail stations is also possible by existing bus services or by the HertsLynx DRT system, which will integrate into the proposed mobility hub.
- 6.4.2. A key planning objective is to ensure that jobs, shopping, leisure facilities and services are accessible by public transport, walking and cycling. This is important for allowing a reduction in reliance on the private car and to promote social inclusion.
- 6.4.3. The appeal site is located to the west of Buntingford. Pedestrian facilities within Buntingford are good with wide footways, along the High Street and through the town centre. There are dedicated pedestrian crossing facilities, in the form of zebra crossings in the town centre.
- 6.4.4. There are two existing PROWs traversing the appeal site, footpath 29 and footpath 26. These provide connections onto the existing footways via:
- Monks Walk (allowing direct access to Millfield First School); and
 - Knights Close (Accessing Luynes Rise and the Seth Ward Community Centre).
- 6.4.5. The Institution of Highways and Transportation (CIHT) 'Guidelines for Providing Journeys on Foot' suggests 'acceptable' and 'desirable' walking distances to key services. This includes desirable (400m), acceptable (800m) and preferred maximum (1200m) walking distances (Core Document 16.4, chapter 6.4, pages 30).
- 6.4.6. MfS states that walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes/800m walking distance of residential areas. This is a realistic distance when

considering convenience, inclement weather, accounting for young children, those with mobility issues and the distance and time taken to undertake a whole journey, including the return leg (Core Document 16.5, chapter 4.4, pages 45).

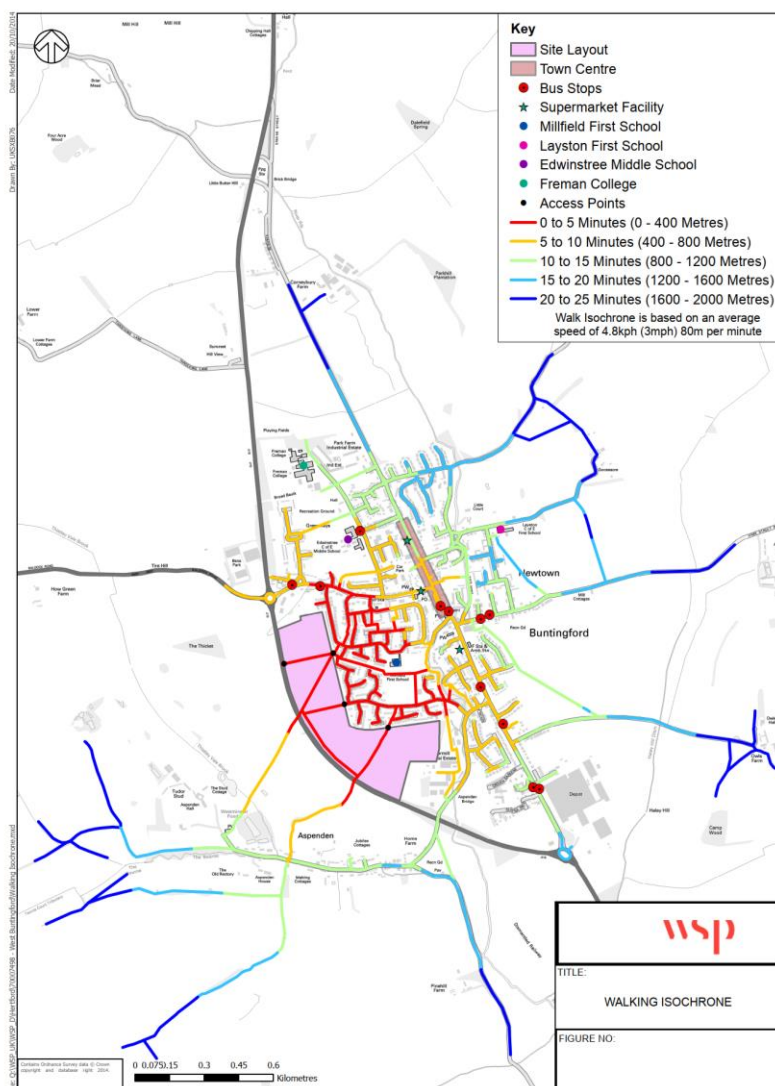
- 6.4.7. MfS also indicates that 800m is not an upper limit and states, with reference to PPG13, that walking offers the greatest potential to replace short car trips under 2,000m (Core Document 16.5, chapter 4.4, page 45. However, PPG13 is no longer extant and therefore this statement should be given limited weight. The National Travel Survey (NTS) undertaken by the Department for Transport (2021) indicates that 80% of walking journeys are typically under 1,600m/one mile.
- 6.4.8. Analysis as part of the Transport Assessment indicated that there are a number of key facilities and services within acceptable walking distance of the appeal site such as the town centre, local schools, supermarkets, and healthcare facilities. This is shown in **Table 6-3** - Walking Distance to Key Services and in **Figure 6-1** - Walking Isochrone below.

Table 6-3 - Walking Distance to Key Services

Facility	Distance (m)
Existing Bus Stop (Baldock Road)	270
Existing Bus Stop (Station Road)	600
Millfield First & Nursery School	250
Layston First School	1200
Edwinstree Church of England Middle School	800
Upper School (Freman College)	1200
Buntingford First School	1600
Park Farm Industrial Estate	1500
Buntingford Business Park	750
Watermill Industrial Estate	700
Seth Ward Community Centre	400
Medical Centre	800
Dentist	1000

Facility	Distance (m)
Opticians	800
Pharmacy	800

Figure 6-1 - Walking Isochrone



6.4.9. **Table 6.3** has characterised the distance from the appeal site to key retail, employment, healthcare, and education facilities in Buntingford. Most of these key services can be categorised as within desirable/acceptable walking distance from the appeal site as per CIHT guidance (Core Document 16.4, chapter 6.4, pages 30). All of the facilities other than Park Farm Industrial Estate and Buntingford First School are no further from the appeal site than the preferred maximum walking distance (1200m). However, despite Buntingford First school being further than the maximum preferable distance, it is

important to note that there are two other closer first schools within the maximum preferable distance; Millfield First School is within 250m as the closest first school and Layston First School is within 1200m.

- 6.4.10. CIHT guidance indicates that residents may be prepared to walk up to 2000m if commuting to work. This is a logical explanation as people may be willing to walk further if they intend to spend longer there. This would mean the Park Farm Estate (1500m) and other key employment sites fall within a 2000m radius of the appeal site.
- 6.4.11. CIHT guidance in ‘Providing Journeys on Foot’ also suggests ‘acceptable’ and ‘desirable’ walking distances. **Table 6-4** - Suggested Acceptable Walking Distances (metres) contains the suggested acceptable walking distances for pedestrians without mobility impairment for some common trip purposes.

Table 6-4 - Suggested Acceptable Walking Distances (metres)

	Town Centres	Commuting/ Schools	Elsewhere
Desirable	200	500	400
Acceptable	400	1,000	800
Preferred Maximum	800	2,000	1,200

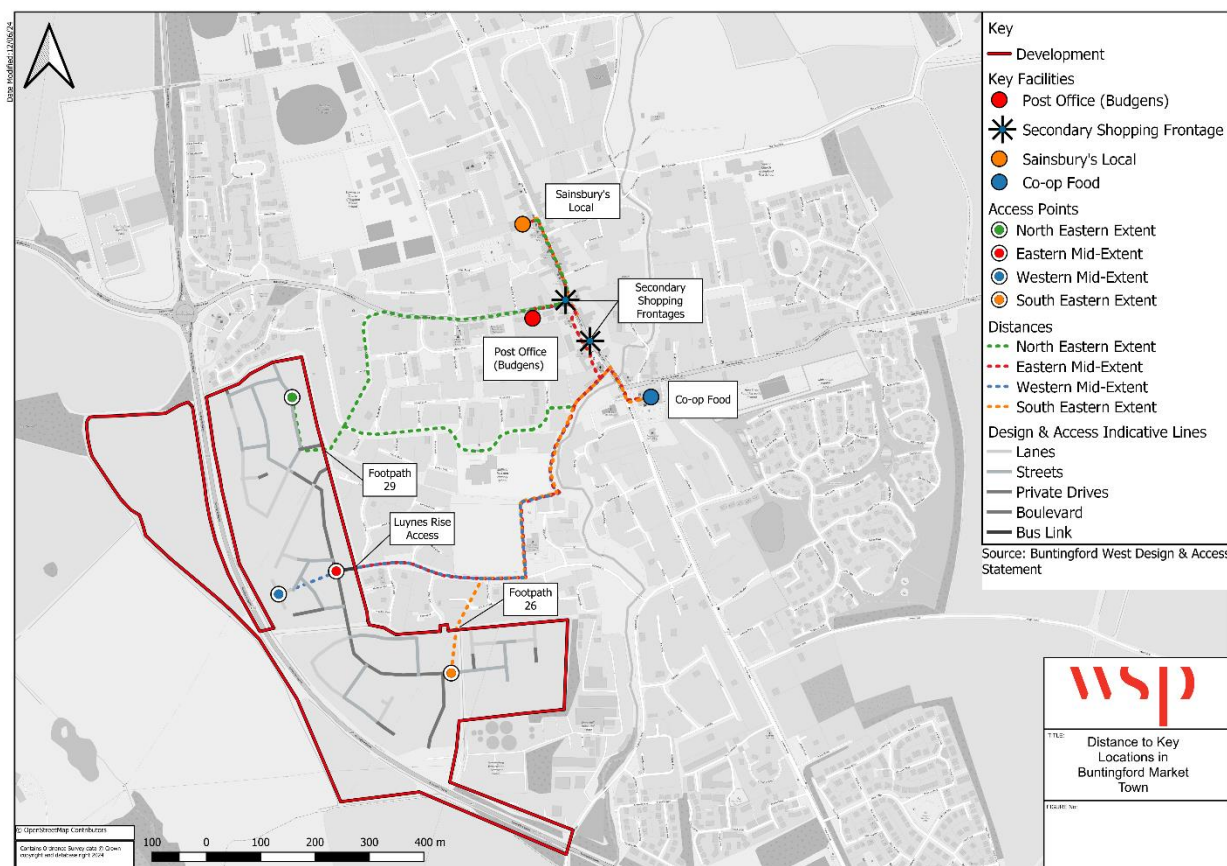
- 6.4.12. For a more robust assessment we have also analysed the distance from 4 points of measurement from the appeal site to key food services in Buntingford market town. These points have been taken, from the northeastern extent, Eastern and Western mid-extent and the southeastern extent of the appeal site. This is shown in shown in **Figure 6-2** - Distances to Key Locations in Buntingford Market Town and **Table 6-5** - Measurements from the Appeal Site to Key Food Services and the Town Centre (Core document 4.1, chapter 16, page 200).

This demonstrates that the appeal site is no further than approximately 10-15 minutes walking from any of these 4 distances to the key frontages.

Table 6-5 - Measurements from the Appeal Site to Key Food Services and the Town Centre

Key Frontage	Distance 1 (m) North Eastern Extent	Distance 2 (m) Eastern Mid- Extent	Distance 3 (m) Western Mid- Extent	Distance 4 (m) South Eastern Extent
Co-op Supermarket	773m	842m	923m	761m
Post Office (Budgens)	772m	968m	1050m	884m
Secondary Shopping Frontages	842m	827m	905m	744m
Sainsbury’s Local	1010m	1060m	1140m	979m

Figure 6-2 - Distances to Key Locations in Buntingford Market Town



6.4.13. Overall, the site has good accessibility to key services within walking distance and this will reduce dependency on private cars. Analysis carried out as part of a robust assessment into the distances to key shopping frontages indicates that both the Northeastern and Eastern/Western mid extent distances are marginally higher than the preferred suggested maximum distances to the secondary shopping frontage of 800m (no more than 105m for any measurement). However, these distances are likely to apply to the dwellings that will be furthest away from the key walking accesses into Buntingford via the PROW 26, 29 and the enhanced Luynes Rise access.

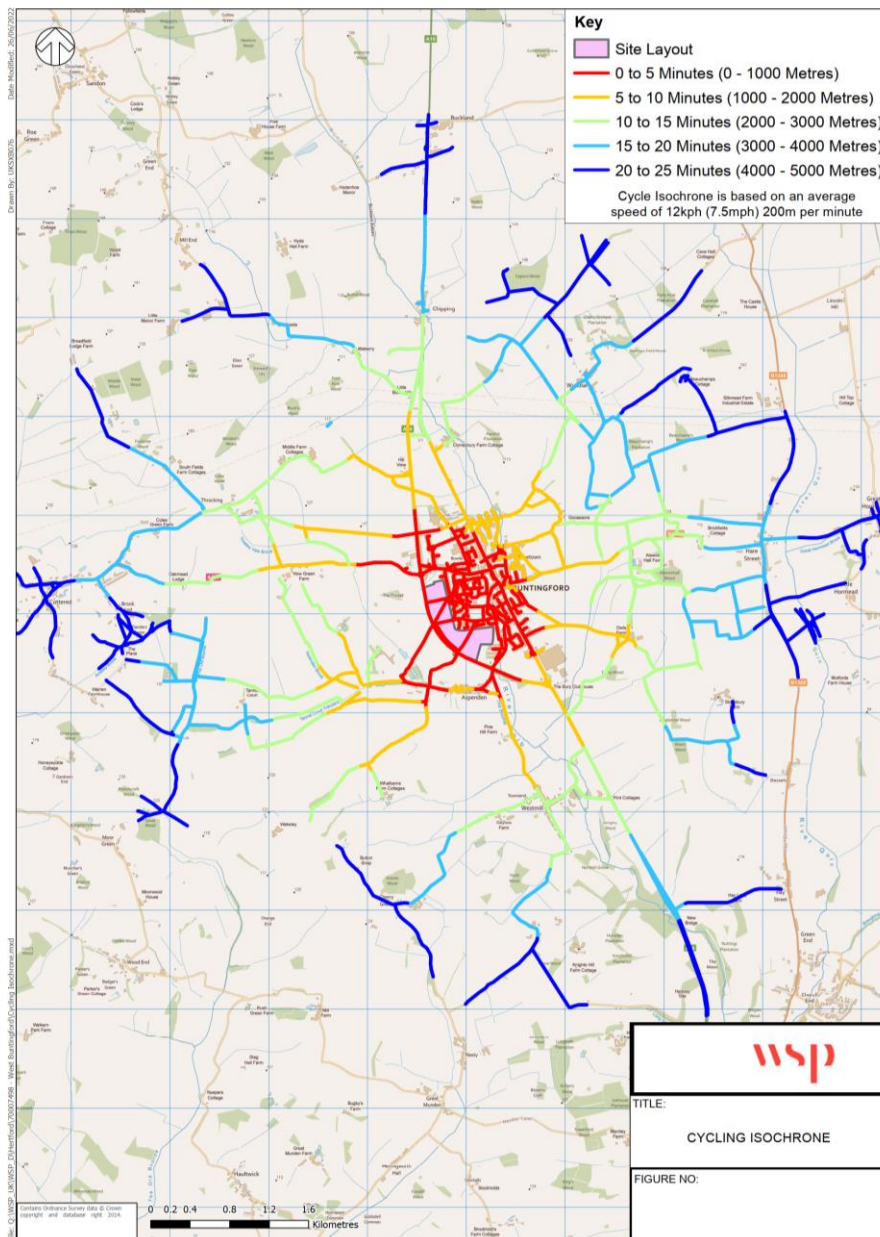
6.4.14. It should be reiterated that these distances presented by the CIHT are only “suggested” and no evidence is provided to support them. Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes’ (up to about 800m) walking distance of residential areas which residents may access comfortably on foot. However, this should not be seen as an upper limit and that walking offers the greatest potential to replace short car trips, particularly those under 2km, the NTS also supports this assertion, albeit slightly lower, with at least 80% of walking journeys typically under 1,600m/one mile.

- 6.4.15. Manual for streets also encourages a reduction in the need to travel by car through the creation of mixed-use neighbourhoods with interconnected street patterns (indicative within the masterplan at this stage where daily needs are within walking distance of most residents (Core Document 16.5, chapter 4.4, pages 45). Therefore, it can be assumed it is unlikely that an additional 105m over the suggested acceptable distance will not deter future residents from walking to the secondary shopping frontage. Research conducted in 2019 by Andre Neves and Christian Brand indicates that at least half of all car trips were less than 3 miles long. This in turn has the potential for mode shift, revealing that 41% of short car trips could realistically be made by walking and cycling.

6.5. CYCLING

- 6.5.1. There are no national or dedicated cycle routes in Buntingford, however there are a number of on and off-road cycleways, bridleways and Byways Open to All Traffic (BOATs) within Buntingford and the surrounding countryside, providing connections to local villages and leisure routes. It is also noted that local traffic levels and topography are not sufficiently onerous as to prevent the use of cycling as a viable mode of travel within Buntingford and the surrounding areas. A cycle shop is available in the town.
- 6.5.2. Cycle parking is available at the Cooperative supermarket in the town centre, in Bowling Green Lane Pay and Display Car Park (located just off of the high street), and in the town centre, outside the Black Bull Pub, where B1038 High Street becomes B1038 Baldock Road.
- 6.5.3. In respect of cycling, up to 8000m (5miles/30minutes) is a reasonable radius against which to test the range of facilities within cycling distance of the appeal site. As shown in **Figure 6.3** Buntingford is within the range of this mode of transport. Many key services including the town centre, employment, retail, education, and healthcare facilities are within a 5–10-minute cycle and no further than 2000m cycle from the appeal site.

Figure 6-3 - Cycling Isochrone



6.6. PUBLIC TRANSPORT

6.6.1. The current nearest bus stops to the appeal site are located on Baldock Road to the north of the appeal site (270m), and Station Road to the east of the application site (600m). Bus services run between Buntingford and Baldock-Letchworth-Hitchin-Stevenage (386) serving Baldock High Street (a 20-minute bus journey from Buntingford High Street), Ware-Hertford (331), Bishop’s Stortford (386), Royston (18), and Standon (831). Two further bus stops are located on Hare Street Road, northeast of the appeal site, with route 386 running approximately every 3 hours and route 331 running

approximately hourly and route 18 running every 1.30 hours and route 831 running a school service in the morning and afternoon.

- 6.6.2. Positive discussions have taken place between WSP and Arriva over extension of 331 bus service. HCC Highways consider that an appropriate bus route serving the development is possible. It is noted that the 331 route can be comfortably extended through the site by the access onto the A10 which allows the bus service to loop through central Buntingford and around back through Luynes Rise without affecting the existing bus service frequency. Contributions towards these services are to be secured via the HCC Developer Infrastructure Contribution. HertsLynx on-demand bus service is in addition to the existing bus services which was launched in September 2021. HertsLynx enables users to travel anywhere in its Free-Floating Operating Zone. There are no fixed routes on the service, instead passengers are able to be picked up and dropped off at a vast number of stops within the zone. Those passengers are also able to travel from the Free-Floating Operator Zone to designated locations in the Key Hub Towns which include Stevenage, Bishop's Stortford, Royston, Baldock, Hitchin, Letchworth and Buntingford which is the central hub. The closest railway stations to the Appeal Site are located in Royston (7.9 miles), Baldock (8.4 miles), Stevenage (10.2 miles), Ware (10.4 miles), Bishop's Stortford (12.5 miles), and Hertford (12.8 miles) either measured from the Greenways or Station Road bus stops in Buntingford via Google maps.
- 6.6.3. As part of the Transport Assessment Trip distribution of the appeal site has been estimated using journey to work data, the main destinations of trips from Buntingford are East Hertfordshire towns- Bishop Stortford, Buntingford, Hertford, Ware (33%), Stevenage (11%) and Hatfield (9%). Therefore, the re-routing of the 331 service into the site will help to alleviate the number of these employment trips that will use a private car.
- 6.6.4. The availability of the 386-bus service to the appeal site from the Greenways bus stop, which is approximately (approx. 270m) provides a good link to Baldock Station. The journey by bus takes 18 minutes, which is only 4 minutes longer than the time it would take by private car (14 minutes). The journey from Baldock station to London is 53 minutes and to Cambridge is 30 minutes as per the current Trainline timetable. Therefore, future residents of the site can benefit from fast commuting times to major employment centres such as London or Cambridge via accessible bus services to the site.

6.7. SUMMARY

- 6.7.1. The appeal site offers excellent accessibility to key services by walking, cycling and public transport. This means it supports planning guidance and the objective to reduce car dependence and promote sustainable development.

7. SUMMARY AND CONCLUSIONS

- 7.1.1. The development site is located in a highly accessible location. It has been established that Buntingford is a suitable location for residential and employment development. Future residents of the proposed development will have good access to local facilities on both foot and by bicycle. Whilst outside the appeal site boundary, the existing PROW routes already provide good links to the town centre and local facilities. They will be able to take advantage of local bus services which can be accessed from nearby bus stops but also the onsite Mobility Hub. Walking and cycle link improvements are part of the package of measures that will ensure accessibility to the wider network is possible. The links will be designed to ensure that it provides a safe and convenient route for its users, all year round.
- 7.1.2. Bus accessibility will be improved by the provision of a new mobility hub on site. The development will provide a financial contribution of £810,000 to HCC towards the County Council's scheme to enhance the existing bus services.
- 7.1.3. The financial contributions described above once secured will ensure that HCC can begin to operate the enhanced bus service with confidence that its viability will be secure in the longer term.
- 7.1.4. The enhanced 18 bus service will provide an attractive and reliable service to new residents which will help to connect them to key towns, villages and employment sites at more attractive frequencies. The enhanced bus service will provide an attractive and useful service to new residents by connecting them to key towns, villages and employment sites. For example, the bus trip to Baldock station will take 18 minutes compared to a 14 minute journey by private car. The A10 access also allows for bus services to loop through the town and around back through Luynes Rise rather than terminating at Greenways and turning at Baldock Road/A10 roundabout and beginning a new service. The enhanced service will provide a significant benefit not just to new residents but also to the wider community. Separate Framework Travel Plans for the residential, retail and commercial developments was submitted as part of the outline planning application. The 2023 Framework Travel Plan describes how residents will be encouraged to adopt sustainable forms of travel.
- 7.1.5. The key target is to achieve a 30% reduction in the single occupancy car driver mode share over a three-year period for the fully occupied development, as measured from a baseline position.
- 7.1.6. It is accepted by HCC that these measures are effective in enabling all future occupants to adopt non-car forms of travel and in the main through our proposed initiatives the site can operate sustainably.
- 7.1.7. One of the EHDC's refusal comments is in relation to "the sustainability of the proposals and whether the proposals will rely on the private car to access employment, main food and comparison shopping elsewhere". This is despite the appeal site being developed in compliance with EHDC Policy TRA1, which states that should be developed based on local travel plans. HCC provided "no objection" to the appeal site in terms of sustainability and accessibility as every effort in a joint and collaborative way has been made via the provision of public transport enhancements and active travel improvements.
- 7.1.8. The transport matters described in my proof of evidence have been confirmed by the Statements of Common Ground which have been agreed and signed by HCC and EHDC. No transport related objections have been received from the Highway Authority (HCC) or Active Travel England.

- 7.1.9. I consider that the proposed development scheme complies fully with the requirements of national and local planning policy.
- 7.1.10. In summary, the key transport points are:
- The proposed development presents no adverse transport impacts. There are no highway capacity issues. Nor are there any road safety concerns; and
 - Other sites that have been granted planning consent, or have received resolutions to grant consent, demonstrate that the development site is an accepted sustainable location for residential development.
- 7.1.11. In conclusion, I consider that the residual cumulative impact of the proposed development scheme will be beneficial for Buntingford. I do not consider that there are any transport related reasons for refusing planning consent.



62-64 Hills Road
Cambridge
CB2 1LA

wsp.com