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Response to Planning application from Hertfordshire County Council (T and CP GDP Order 2015)

Director of Planning
East Herts Council
Wallfields
Pegs Lane
Hertford
Hertfordshire
SG13 8EQ

District ref.	3/22/2406/FUL
HCC ref.	EH/15169/2022
HCC received:	28th December 2022
Area manager:	James Dale
Case officer:	Sarah Hearn

Location
Land North And East Of Ware (WARE2), Ware, Hertfordshire

Application Type
Hybrid Application

Application Details
Hybrid planning application, comprising: a) Outline approval for a residential-led mixed-use development for up to 1,800 new market and affordable homes, including self-build and custom build homes and around 3 hectares of new employment provision, mixed-use local neighbourhood centres, new retail, business, commercial and community uses, new and expanded primary schools, with early years facilities and new secondary school provision, new public open space and outdoor sports facilities, including all an weather 3G sports pitch, the provision of plots for Travelling showpeople, new ecological areas, allotments, woodlands and other public areas, new pedestrian, cycle and vehicular accesses and movement networks within the site, associated drainage and SuD's infrastructure, utilities, energy and waste facilities and enabling infrastructure works to the existing highway, other supporting works, facilities and infrastructure, together with associated temporary enabling works and structures. With all matters reserved for later approval, apart from works in connection with the associated primary and secondary access junctions at the A10/A1170/Moles Farm interchange and the access junction at the B1004 at Widbury Hill and at Fanhams Hall Road. b) Full planning approval for internal highways works relating to the construction of Stages 1a and 1b of the Sustainable Transport Corridor, linking the A10/A1170 to the B1004, via the new access junctions, as defined on the Movement and Access Parameter Plan and the Detailed Access Plans.

Recommendation
Further information is required prior to the Highway Authority providing a final recommendation on this application.

Comment
Introduction

This application is for outline approval for a mixed use development for:

- up to 1,800 dwellings
- an eight form entry secondary school
- a new primary school
- land for the expansion of the existing Priors Wood Primary School
- 24,000sqm of office space (use class E)
- 1,750sqm of retail/restaurant/café/professional services (use class E (a)(b)(c))
- 2,500sqm of Community Centre use (use class F2(b))
- 1.79ha for a travelling show people site.

This is a hybrid application and in addition to the outline permission, full planning approval is sought for the primary and secondary access junctions and internal highways works relating to the construction of the two initial stages of the Sustainable Transport Corridor, linking the A10/A1170 to the B1004, via the new access junctions.

The proposed development site is allocated in the East Herts Local Plan (2018), under Policy WARE2. In relation to transport, the following aspects of the policy are key and will be considered throughout our assessment of the proposals:

I. *Land to the North and East of Ware is allocated as a mixed-use development site, to accommodate at least 1,000 new homes by 2033.*

II. *In the event that suitable mitigation measures to identified constraints on both the local and wider strategic road networks can be identified and agreed by Hertfordshire County Council as Transport Authority, a further 500 dwellings will also be delivered in this location*

V. *The development is expected to address the following provisions and issues:*
(k) access arrangements and local highways and wider strategic mitigation measures which, inter alia, should include a link road between the Widbury Hill area and the A10/A1170 to both serve the development and mitigate congestion elsewhere in the town, and further should contribute to addressing impacts in the town centre and on the A10 between Ware and Hertford and the A414 in Hertford;
(l) encouragement of sustainable transport measures, both through improvements to the existing walking, cycling and bridleway networks in the locality and through new provision, which should also provide links with the adjoining area and the town centre (which should also include a direct public footpath and cycleway from the High Oak Road area to enable direct pedestrian and cycle access to Wodson Park and the A1170), together with enhanced passenger transport services (particularly in respect of bus provision and access to the town centre and railway station)

The EHDC Local Plan policy clearly sets out that any development over 1,000 dwellings will only be permitted should the applicant demonstrate that suitable mitigation measures will be implemented. This is vital to ensure that the development will not have an adverse impact on the strategic and local highway network.

The mitigation measures which have been proposed to justify the additional 800 dwellings have been assessed against HCCs Local Transport Plan 4 (LTP4). The LTP4 supports the creation of built environments that encourage greater and safer use of sustainable travel modes. LTP4 Policy 1 sets out the Transport User Hierarchy which highlights that opportunities to reduce travel demand and the need to travel is considered top of the hierarchy, followed by vulnerable road user needs (such as pedestrians and cyclists), passenger transport user needs, powered two wheeler (mopeds and motorbikes) user needs and finally other motor vehicle user needs. The Transport Hierarchy and overarching LTP4 policies and principles form the basis of the Highway Authority's assessment and overall recommendation, considering the EHDC allocation policy.

Site Accessibility and Sustainability

The site is located to the north and east of the existing town of Ware and is bounded by the A1170 at the north-western edge, which in turn provides access to the A10, Widbury Hill (B1004) on the south-eastern edge and Fanhams Hall Road passes through the middle of the site on a southwest-northeast axis.

Chapter 5 of the Transport Assessment (TA) includes an assessment of the accessibility of the site to public transport facilities. Whilst the 310, 331 and 395 bus routes run within Ware, there are no bus stops in the immediate vicinity of the development site. In addition to the limited bus infrastructure, Ware railway station is located c. 2 miles from the development site.

The site's position on the outskirts of Ware, combined with its significant scale, makes the provision of excellent public transport within the site essential. There are limited cycle routes in the vicinity of the site and therefore efficient cycle links to/from Ware town centre and railway station are also of key importance.

In terms of access to local facilities and amenities, Chapter 4 details those closest to the site. Whilst there are a number of primary local facilities within Ware, no assessment has been undertaken, to clearly show the distance between each amenity and the development site. It is however noted that the majority of facilities, as shown on Figure 4.4, are located on and adjacent to Ware High Street, c. 1.8m from the development site.

As set out above, the site is relatively isolated given its scale and its position on the outskirts of Ware. Whilst with a development of this scale, it is noted that some facilities and amenities are proposed in accordance with the development mix, ease of accessibility to Ware via active modes and public transport will be of highest priority. The Highway Authority therefore seeks measures, in accordance with LTP4 Policy 1 and the Local Plan Policy Ware 2 which can ensure residents have highest quality infrastructure to encourage greater use of non-car modes.

The applicant is also advised that the South Eastern GTP should be referred to throughout the TA and in Appendix A rather than the Hertford & Ware Urban Transport Plan. The GTP is now an adopted document as of July 2022 and supersedes the UTP. The policy review should therefore be updated to reflect this.

Access

Access to the proposed development site is not a reserved matter and full detailed permission is sought for the access arrangements. The site is currently accessed via Moles Farm, from the A1170/A10 roundabout, and from Fanhams Hall Road to the south of the development site. There is also access from Fanhams Hall Road to the Round House site, which is located within the applicants red-edge boundary. Very limited information has been provided in relation to the Round House site and the applicant is advised to provide further details as to how the Round House site fits into the wider development and how the access arrangements are anticipated to be managed.

The development proposals include two new accesses into the site. These consist of:

- a roundabout junction at the Moles Farm roundabout
- a signalised junction at Widbury Hill.

No changes are currently proposed to the Fanhams Hall Road access, however, paragraph 11.4.2 of the TA states that *'there is potential for modal filters to be located on Fanhams Hall Road / Musley Hill restricting vehicle traffic into the town centre.'* This measure is currently proposed under the monitor and manage approach to the site. Whilst a wider monitor and manage approach is welcomed to monitor travel behaviours and ensure the site is meeting its

mode shift targets, solely adopting a monitor and manage approach to the Fanhams Hall Road access is insufficient. The applicant is therefore advised to provide a detailed junction design plan. As part of this plan, information must be provided as to the potential measures which could be deployed at Fanhams Hall Road to ensure rat running does not occur and mode shift targets are met. This information must include the principles of how any future measures would work and be enforced, in addition to financial commitments.

The principle of the accesses either end of the development is accepted, and the junction modelling shows both accesses to have sufficient capacity once the development is fully built out based on the trip generation and mode shift assumptions set out within the TA. It must be ensured that the mode shift assumptions are met through the package of sustainable transport measures, both within and outside of the site.

Swept path analysis drawings have been provided showing an 11m refuse vehicle and 12.00m bus safely travelling through both of the access junctions. The applicant is however advised that EHDC use refuse vehicles measuring 12.205m in length. It is also noted that a swept path analysis drawing has been provided showing a 16.5m articulated vehicle travelling through the Widbury Hill access, however this has not been provided for the Moles Farm roundabout. Plans must be provided to evidence that 16.5m articulated vehicles can safely travel through the Moles Farm roundabout. This information must be provided to ensure the access arrangement is fit for purpose.

Concern is also raised that both of the junctions have not been designed in line with LTN1/20. Both accesses must be updated to ensure the footway and cycleways and associated crossings have been provided in accordance with LTN1/20. Furthermore, no Road Safety Audit (RSA) appears to have been undertaken for the accesses. A Stage 1 RSA must be undertaken for both new accesses.

It is noted that there is limited cycle and pedestrian accesses outside the main vehicular accesses. The applicant is advised to consider increasing pedestrian and cyclist permeability into the surrounding area, including via Cozens Road. Further work must be undertaken to improve the pedestrian and cycling connections from the site into the existing settlement of Ware.

Ultimately, a significant amount of additional work is required to be undertaken on the access arrangements.

<u>Strategic Transport Corridor (STC)</u>
The STC provides a link through the site, from the new Moles Farm roundabout to the access on Widbury Hill. It is noted that stages 1 and 1b of the STC are to be determined in detail as part of this application and are not a reserved matter.

Paragraph 2.3.1 of the TA advises that a 6.75m wide corridor is proposed through the development. The applicant is however advised that HCC would wish to see a 6.5m corridor (with potential reductions in locations with 20mph speed limits), according with our emerging Place & Movement Planning Design Guide (Part 3, Chapter 8) which aligns to CIHT's guidance '*Buses in Urban Developments*'. The TA also advises that the internal roads of the development will be offered up for adoption by HCC and this therefore further highlights the need for the STC to be designed in accordance with up-to-date guidance.

With the exception of the carriageway width, the submitted drawings show the STC to be carefully designed, with a 3m segregated cycleway on the northern side of the carriageway, 2m footways either side of the carriageway, suitable verges and bus gates. The alignment of the STC is also accepted and HCC note that paragraph 2.4.2 of the TA advises that '*the major horizontal alignments and vertical alignments have been design based on the information*

provided in CD 109 and RiH Table 4.1.1.1 Road Design Criteria based on a 20mph - 30mph speed limit' and associated visibility splay plans have been provided for these speeds. It is noted that in the north-eastern corner of the site, the STC is dedicated solely for buses, with all other vehicular traffic required to travel round a more circuitous route. This is in line with HCCs design principles and will help support efficient bus journey times and ensure the bus is a real alternative to the private car.

It is noted that a new circular bus service is proposed which will provide a 20-minute frequency at peak times and call at Ware Town Centre and Ware Station. This new bus service is welcomed and paragraph 2.6.1 of the TA advises that bus stops will be provided along the STC, however these have not been shown on the submitted plans. Should a bus stop be proposed within stages 1 and 1b of the STC, these should be shown on the plans, in addition to indicative location of future bus stops along the STC. It is also advised that should any cycle hire docking stations be proposed within the first two stages of the STC, these should be shown on submitted plans.

Whilst the 20-minute bus frequency is welcomed, the Highway Authority note that the proposed bus service offering is significantly reduced compared to the scheme which was originally discussed. It is understood that the new circular bus service is one of the key measures proposed to justify the additional 800 dwellings at the site, however no evidence has been provided as to why the frequency of the services has been reduced. Further justification and evidence as to how the proposed 20-minute service will ensure sufficient modal shift must therefore be provided.

The submitted drawings do however show bus gates at either end of the STC which will support reliable bus service times. However, thought should be given for future proofing the site to allow for new bus gates to be created over time as capacity is filled. Further evidence is also is required to ensure that the bus bypass for the gate at the Moles Farm Roundabout is of sufficient length. It should also be stressed that any new structures making provision for walking and cycling need to also abide by the same design criteria set in LTN 1/20 and similar documents adopted by HCC.

Section 6.2 of the TA advises that mobility hubs are proposed within the site. It is anticipated that these will be located off the STC and paragraph 6.2.3 of the TA states '*each hub will provide a range of sustainable transport options including, key bus stops, cycle hire docking stations, secure cycle parking and car club vehicles. Each hub will also ensure that secure Amazon / delivery lockers or counters are provided as a self-service kiosk where future residents can pick up and send parcels at their convenience.'* Whilst this scheme is welcomed and will encourage sustainable travel, the design and location of these hubs need to be provided with this application to ensure that they will be suitably located and provide high quality facilities to support sustainable travel.

It is assumed in Section 2.2 of the TA that the STC will not be completed in its entirety until 2029 or 1,000 units and this would be unacceptable to HCC for multiple reasons. Firstly, this would prevent a continuous bus route throughout the site which would provide sustainable travel connectivity to both the town centre and the train station. Secondly, in the interim this would mean that additional vehicular traffic demand would be placed through the town centre which is already at or nearing capacity (acknowledged in Section 8.8 Junction Stress and Appendix R). Thirdly, in the early stages of the development, when the secondary school is not proposed to be built out, concern is raised that without the STC, there will be limited options for children to travel sustainability to school. An updated phasing plan is therefore required to be submitted, ensuring that the STC is completed at an earlier stage of the development.

It is also noted that there is a disagreement between the TA and the Housing and Infrastructure Delivery Statement (HIDS) as to when the STC will open. The TA says stage 1A and stage 2

(through the west) will all open in 2029. However, the HIDS says the STC stage 1A will open in 2027. All documents should be consistent to ensure the proposed phasing of the site is clear.

Both of the proposed school build out dates are however a concern as the school is proposed to be built out in the later stages of the development and very little consideration has been given as to how children from the development will access the existing schools in the period before the secondary school is built. Whilst Paragraph 7.4.3 of the TA advises that *'it is expected that those commuting out to secondary school from the development would travel by coach or as part of a wider linked trip',* no further information has been provided as to how the applicant will provide safe and sustainable routes between the development and the existing schools in Ware and Hertford. No detailed interim arrangements for school travel have been proposed and the applicant is advised to provide further detail on how children will access the existing schools by active and sustainable transport modes prior to the secondary school being built.

The Highway Authority are concerned with the approach of stages 1 and 1b of the STC being submitted in detail at this stage of the application. A range of access arrangements are shown on the submitted plans (bellmouths, Copenhagen crossings, priority junctions etc.) however there is no certainty as to what these accesses will serve. The Highway Authority therefore cannot assess the suitability of the proposed accesses given the reserved nature of the rest of the application site.

Furthermore, it must be ensured that any accesses which come off the STC where the bus gate is proposed are cul-de-sacs, to ensure traffic cannot bypass the bus gate. It is therefore advised that no detailed accesses are shown at this stage, and instead, indicative locations of the accesses shown, with the final access design to be determined at a later stage. The plans should be updated to reflect this.

Public Transport

As set out above, a new circular bus service is proposed to serve the site. Paragraph 6.6.1 advises that will run on a 15 – 20 minute frequency, with the potential for more regular peak hour services. it is proposed that two buses will run in opposite directions and serve Ware Station, employment are to the west of Ware, the High Street, Wodson Leisure Centre and the employment area within the site. This new bus service is welcomed and is seen as a vital link to connect the development with the local facilities within Ware.

Paragraph 6.6.3 also sets out that '*to encourage sustainable travel, the developer proposes to offer a range of short term and long-term tickets. Shorter term tickets would come in the form of travel vouchers. It is recommended that two years free bus travel is offered to every new resident or employee.'* Whilst the principle of these ticket incentives are welcomed, a more definitive commitment must be made to fully set out how residents of the site will be incentivised to use public transport from first occupation.

The TA advises that *'it will not be cost effective or deliverable for the circular service to operate from first occupation and it is therefore proposed that the development is serviced by the Herts Lynx Service in the early years'* and this is accepted. It is understood that funding for the HertsLynx service is proposed for three years following first occupation, however, it is important to recognise that the HertsLynx service is based on funding provided to HCC by central government which is time limited. Though the intention is to maintain this service into the future, this cannot be guaranteed, and therefore creates a risk that a service will not be provided to the site until the spine road is completed. HCC would therefore seek some further thought on this area and the applicant is advised to consider alternative Demand Responsive Transit (DRT) schemes.

Paragraphs 6.6.6 – 6.6.8 of the TA set out a high level proposal for the diversion of the existing 331 bus service. Figure 6.2 shows the proposed route of the diverted 331 and the 339 service. No further information has been included within the TA about the 339 diversion and confirmation on the extent of all of the bus service diversions are required.

As with the DRT scheme, Paragraph 6.6.7 advises that it is only proposed to fund the 331 diversion for the first three years following occupation. Depending on how the new bus service will work in the interim years until the STCs completion, there may be a need to further extend the funding of the 331/339 to provide a sustainable route into Ware for early residents of the site and further information regarding the proposed local bus route diversion timeframes are requested.

The applicant has also committed to improving the following bus stops and upgrading them to benefit from Real Time Passenger Information (RTPI):

- 4 x stops on Wadesmill Road
- 4 x stops on Kingsway
- 5 x stops on High Street / Adjacent to station

Whilst this is welcomed, in addition to upgrading to RTPI, further work must be undertaken to assess the routes to/from all bus stops to nearby destinations to ensure dropped kerbs, crossings and sufficient waiting space is provided at all of these bus stops. Reference should be made to HCC's emerging Place & Movement Planning Design Guide in this regard.

Off-Site Highway Measures

Given the EHDC Local Plan Policy Ware 2, HCCs LTP4 and the extent of proposed development, a significant package of off-site works is essential to support a modal shift for future residents on occupation of the development and to benefit existing residents of Ware.

Section 6.7 of the TA sets out some of the proposed Town Centre improvements. However, after conversations between the Highway Authority and transport consultant, further work is being undertaken on the offering towards improving the Town Centre and connections from the site into the town.

One Way Proposals

Given the distance of the site from the Town Centre and Ware Station and the topography of Ware, public transport and cycling are likely to be the two key means of sustainable travel which can be provided by this site.

LTN1/20 is the most recent government document which provides guidance to local authorities on how to best deliver high quality cycle infrastructure. LTN1/20 is the standard HCC are aiming to reach with all new cycle infrastructure. The historic nature and constrained roads within Ware are noted and therefore it is accepted that LTN1/20 standards may not always be achievable and segregated cycle lanes may not be the best solution given Ware's context.

Where standards cannot be reached, LTN1/20 sets out that in order to provide a high-quality cycle environment, schemes should aim to reduce vehicle volumes and vehicle speeds. A mechanism to reduce traffic volumes along a corridor is by implementing one-way systems. This has been discussed with the transport consultant and the TA proposes:

- North bound operation of Musley Hill from the junction of Collett Road to High Oak Road.
- South bound operation of High Oak Road to the junction with Collett Road/The Bourne.
- No Entry from Amwell End into Station Road.

In relation to the Musley Hill/New Road proposals, the Highway Authority deem that the proposals within the TA for a one-way system are the wrong way round. High Oak Road should be northbound and Musley Hill southbound given the one-way in at Collett Road. This is vital as in its current format vehicles would have to route along The Bourne and onto Wadesmill Road/High Street which would not be acceptable and would necessitate a significant alteration to the Collett Road/Musley Hill/New Road/Musley Lane junction.

It is noted that the reference to No Entry from Amwell End into Station Road is incorrect. As discussed between HCC, EHDC and the developer, HCC's recommendation is that:

- Amwell End becomes a northbound bus gate or one-way from the junction of Broadmeads, with dedicated provision for cycling
- Station Road becomes one-way westbound from Stewart Place with a no-left turn into Amwell End across the railway level crossing
- Amwell End to remain two-way from Broadmeads south to allow HGV access from/to Broadmeads
- Station Road to remain two-way from Stewart Place north.

A great deal of further works are also required on Amwell End and Station Road to improve the environment for walking and cycling and HCC are still awaiting the updated proposals.

HCC have also discussed the possibility of implementing a one-way on New Road (northbound) from Kibes Lane to King Edwards Road in combination with a one-way southbound on Bowling Road. It is understood that this is being taken forward for further exploration.

A great deal of further work is required in relation to the one-way proposals. The determination of such routes for one-way systems should be made with due regard to the most suitable routes for cycling between the site and the town centre, particularly as there are reservations by residents and stakeholders on the impacts of such measures. The Highway Authority requires updated drawings to be submitted, showing well designed schemes which will reduce traffic volumes and support active and sustainable travel.

Wider Sustainable Travel Improvements

HCC note the suggestion has been made at Paragraphs 5.5.8 to 5.5.11 in the TA to implement a Controlled Parking Zone at Ware Station and wider parking rationalisation to reduce car dependency for trips to the station, but no indication has been provided as to how this would be implemented and how the development would contribute towards this. HCC would ask for some further clarity on this point. These proposals should also link into the proposed one-way changes at Amwell End to produce a joined up scheme.

It does not appear any walking or cycling routes have been investigated in detail which provide connectivity from the site to the town centre or station, which have been determined as key destinations from the site. This includes considerations for improving existing facilities and provision of new facilities. Additionally, there appears to only be a minimal number of sustainable access points from the site to the existing Ware urban area, which is required to enable short distance active trips. HCC would suggest this is revisited.

It is also noted that a number of issues are identified and recommendations made for improvements on the back of PERS and CERS audits undertaken in Ware detailed in Section 5.7 of the TA however no clarity has been provided on how or if these will be implemented, or what delivery mechanisms will be utilised. Following site visits, it is also noted that there are numerous locations around Ware which do not benefit from dropped kerbs, tactile paving or sufficient footways, such as at The Bourne/Wadesmill Road junction. This junction also appears excessive in its size and may therefore benefit from some improvements to facilities

safe pedestrian and cyclist movements. The crossing points at the Charvilles roundabout are also substandard and require upgrading. The applicant is advised to consider all the junctions and pedestrian desire lines in Ware and set out a scheme of improvements.

Discussion has also been held with the applicants of implementing a 20mph zone for Ware. This has not been included within the TA and therefore evidence is required to ensure this is still be considered as an option. Reducing the speed limit would benefit the cycling and pedestrian environment within Ware. Consideration of such measures should be referenced against HCC's Speed Management Strategy and the authority's implementation programme of 20mph schemes.

The applicant must also assess the possibility of implementing a cycle connection from the Widbury Hill access to the High Street. This is vital to provide a continuous cycle link and is an omission from the current application. Furthermore, the B1004 Star Street/A1170 High Street roundabout requires significant improvements and considerations as to how to reduce the amount of HGVs travelling through the High Street must be set out. Consideration should also be given to other potential sustainable access points such as Cozens Road which can offer permeability from the site into the existing urban area.

Details of the proposed cycle hire scheme are set out in section 6.4 of the TA. Whilst welcomed in principle, the applicant is advised that rather than having a shared fleet of both pedal and e-bikes, given Ware's topography, a fully electric fleet would be more appropriate and should be proposed. HCC would also question whether it is eminently sensible that locations for the hubs outside of the development are be provided at a later stage, as seems to have been suggested in Paragraph 6.4.4 of the TA. The applicant must carefully consider the location of the docking stations and provide a significant amount of information setting out the proposed locations. The proposed bike hubs and associated stands must also be of high quality design and sensitively located was befitting the Conservation Area. The applicant is advised that EHDC's Conservation must be involved from the outset in regards to the design and location of the bike hubs. The applicant will also need to demonstrate how the scheme and associated docking stations will be able to respond to changing demands and pressures over time within Ware.

Section 6.5 of the TA sets out the proposals relating to car clubs. HCC would agree that the approach set out is largely sensible, however we would seek further clarity on the intentions around charging infrastructure and locations for bays, even if this is in general terms.

Whilst some of the improvements will be secured by S106, HCC do not agree with the statement made at Paragraph 6.7.4. The North and East Ware development should be committing to this through a s278 given the demands it will create upon the town centre and station area.

The applicant is also advised that due to the historic nature of Ware's Town Centre and Conservation Area, the agreed package of improvements must also be compatible with the sensitive environment and high-quality design and materials must be provided. EHDC's Conservation Team must be involved in the design proposals.

After assessing the proposed sustainable transport offering, it is clear that a significant amount of further work is required to be undertaken prior to agreeing a package of measures. When considering EHDC Local Plan Policy WARE2, the applicant is advised that any future submissions must clearly highlight the sustainable transport measures proposed to support the 800 additional dwellings. These measures must be clearly distinguished to show how the proposed schemes will mitigate the identified constraints on the local and strategic road network.

Safety
HCC note that section 4 identifies a number of collisions in the wider area and that suggestions have been put forward for how to mitigate the causation factors, however no mechanisms have been suggested to assist HCC as Highway Authority in achieving this. Further details as to what measures are proposed to mitigate the causation factors of the identified collisions are therefore required.

Public Rights of Way (PRoWs)
It is noted that multiple PRoWs pass directly through the development site and there is a network of PRoWs in the vicinity of the site. The submitted plans show the PRoWs to be retained within the site boundary. The applicant is advised that where possible these footpaths should be upgraded to public bridleways, to also allow cycle use as a sustainable transport option. It must be ensured that the PRoWs are not segregated by any proposed infrastructure on the site and crossings should be included should this occur to ensure pedestrian permeability.

As referenced in Section 6.9, and cross-referenced in Appendix J 'PRoW Strategy', in a number of areas it is suggested that a 2m wide unsealed surface is provided alongside a 2m wide sealed surface for the PRoW upgrades. Though this is acceptable generally for non-motorised routes, a number of corridors, including adjacent to the Moles Farm neighbourhood have the potential to attract a substantial number of pedestrians and cyclists (will serve utility trips). In this instance, a 3m or wider sealed surface would be required, aligning to the precedents of LTN 1/20. Further consideration is therefore required in relation to the PRoW Strategy.

Parking
East Herts District Council are the Parking Authority for the district and EHDC must therefore agree the final parking standards. It is noted that Section 2.8 of the TA advises that it is proposed to adopt lower parking standards than that set out in the EHDC SPD. The applicant is advised that this is acceptable in principle, subject to suitable mitigation.

The applicant is also advised that HCC expect all parking on the site to benefit from either live or passive electric charging points. The level of parking provision should also support the introduction of car clubs and the design of the parking spaces should not dominate the street scene. Consideration as to parking barns and locating parking slightly away from the proposed dwellings would be welcome.

Cycle parking on-site will need to be secure and accessible. HCC would suggest that a helpful addition to Section 2.12 would be to reference the need for secure facilities. As identified in TRL's report 'Cycle Theft in Great Britain', cycle theft is a large contributor for users not continuing to cycle, and in the context of supporting sustainable travel is therefore essential.
The applicant is also advised that LTN 1/20 states that '*as with car parking, a proportion of the cycle parking (typically 5%) should be provided for non-standard cycles to accommodate people with mobility impairments*'. The cycle parking must be designed to follow this guidance and all cycle parking facilities must be covered, secure and appropriately located.

Trip Rates, Distribution and Modal Split
The Highway Authority note the trip generation and distribution exercise as presented within Chapter 7 of the TA.

The Highway Authority is content with the methodology and outputs of this exercise, having been agreed as part of the Scoping Study. As previously noted, the internalisation rates are relatively high. This is however accepted as the applicant is willing to enter into a monitor and manage agreement to monitor the number of vehicles entering/exiting the development.

The Highway Authority does raise a question in relation to Paragraph 7.4.2 of the TA which states '*pupils are expected to commute daily from Hertford by coach'.* The TA does not set out how the development will contribute or commit to enabling pupils from Hertford to access the school site (or vice versa). HCC would ask for further clarity on this point. The applicant is also advised to provide greater consideration as to the cross-town relationship with the secondary schools in Hertford. Whilst travelling by coach would be one option for school travel, more incentive needs to be given to the use of existing transport options, such as train. Further work must be undertaken and further measures proposed to ensure sustainable transport modes will be utilised for pupils attending the secondary school from outside the development/Ware.

As with the trip generation, the distribution assessment is accepted in principle. It is however noted that Table 7.14 sets out the proposed distribution by link and this table includes links 18 and 23 which refer to Fanhams Hall Road and the site access. The applicant must confirm whether this link is referring to vehicles traveling from the site via Fanhams Hall Road. As stated above, further work is required on the Fanhams Hall Road access and therefore clarity is requested as to the anticipated vehicle distribution.

To establish the baseline modal split, the 2011 Census data was initially interrogated. However, Table 4.9 of the TA shows that by TRICS sites with more recent survey data than the 2011 census, other developments in comparable locations in south-east England have lower total car mode shares. It is understood that the car mode share set out in Table 4.9 has been taken forward to inform the baseline mode share and the future modal split has been determined based on the proposed sustainable and active travel improvements. The approach to future mode share has not been clearly set out in Chapter 4 in the TA and further clarity on how the statements set out in paragraphs 4.7.12 – 4.7.15 will result in a definitive predicted mode shift.

<u>Modelling</u>
The applicant's transport consultant has engaged the Highway Authority in pre-application advice concerning the scope of the modelling work.

A range of traffic survey data has been collected and proposed to inform the baseline assessments. The collected data sets are:

- ATC (collected in 2014, 2021 and 2022)
- MCC data (collected in 2014 and 2017)
- ANPR (collected in 2014)

The principle of using these data sets was agreed subject to the data collected in 2021 (during the COVID-19 pandemic) being adjusted in line with HCCs adjustment factors. Whilst paragraph 4.5.5 of the TA sets out that '*where additional data was required, specific 'Covid adjustment' factors have been agreed with HCC and applied to any traffic data collected in 2021'* the COVID-19 adjustment figures have not been stated in the TA. The applicant must confirm that the following COVID-19 adjustment factors have been applied to the 2021 ATC survey data:

- AM Factor: 1.106
- IP Factor: 1.011
- PM Factor: 1.099

The TA confirms that TEMPRO has been used to growth all the required datasets to a 2022 baseline and this approach is accepted.

The technical work has included a comprehensive modelling exercise using the Highway Authority's strategic transport model, COMET. The model was run by Hertfordshire County

Council's term consultant on behalf of the developer and the Highway Authority have been advised the applicant on the modelling scenarios, inputs and outputs throughout the strategic modelling process. COMET modelling has been undertaken for 2036.

After assessing the TA, it is noted that there are discrepancies between the quantum of development modelled in the COMET model and that set out in paragraph 2.1.4 of the TA. The quantum of office, community centre, retail/restaurant/cade/professional service use in the TA is significantly lower than what was modelled in COMET, and the travelling show people site is larger than that modelled. The applicant must definitively confirm the proposed quantum of development and if there are discrepancies between that modelled and the now proposed development, the impact of this on the modelling results.

Whilst the 2036 COMET modelling shows that the STC will make a positive difference to journey times in Ware Town Centre, the results of the model also highlight that the development will push a number of junctions over capacity. The TA advises that as a result of the development, additional pressures are observed at B1004 Widbury Hill/Hollycross Road, where the V/C exceeds capacity with a value of 93% and during the PM peak with the development in place, the Westmill interchange is overcapacity. Further to this, paragraph 8.7.1 identifies through the 2036 COMET model run that additional rat-running traffic is observed to be routing onto Hollycross Road as a result of the development. Hollycross Road provides a link to the Cappell Lane/Roydon Road/B181 junction and the modelling shows an increase in traffic through this junction within Stanstead Abbotts. As previously discussed, a contribution towards mitigation for these junctions which will be exceed capacity as a result of the development should be provided by the applicant.

Furthermore, paragraph 8.8.2 of the TA highlights that the A602 Tonwell Bypass Road/Anchor Lane junction nears capacity in 2036 (without development). Paragraph 8.9.2 of the TA also states that in the PM peak in the 2036, with development scenario, *'the A602 Tonwell Bypass Road/ Anchor Lane/ A602 Westmill Bypass/ B158 Wadesmill Road junction experiences increases in delay on nearly all approaches of 33, 5 and 40 seconds respectively*. However, no mitigation has been proposed for the A602 Tonwell Bypass/Anchor Lane junction. This is unacceptable and further work must be done to mitigate the development's impact on these junctions.

S-Paramics assessments were also undertaken to assess the local highway network in the interim period of 2029 (when the STC is proposed to be completed) and 2035 (full build out) and these scenarios were created using the 2022 reference case model. HCC note that this modelling exercise included the agreed trip rates with no modal shift. A modal shift sensitivity exercise has also been undertaken to provide an understanding of the required level of mode shift to achieve similar journey times to 2022. This highlighted that mode shift of c. 10% is required to align with 2022 flows.

The results of the S-Paramics modelling includes assumption on the bus services and a breakdown on bus journey times. It is noted that paragraph 9.9.2 specifies the introduction of a westbound bus only link to connect Station Road to Amwell End. No further information has been provided and the applicant needs to demonstrate how this is being delivered.

Furthermore, clarity is needed on the bus journey times set out in Table 9.1 of the TA. As the STC will not be complete until the end of 2029, it is understood that the new circular bus service would operate in a dumbbell pattern in the 2029 model case. However, this doesn't appear to be reflected in the journey times assumed, given that buses in effect would need to complete a double journey. Equally, HCC would argue that this arrangement is unlikely to be commercially attractive or viable. Therefore, the benefit that is derived from this is questioned and further explanation as to how the bus services will operate in the interim stages and the associated journey times.

The S-Paramics modelling also assesses general traffic journey times. It is noted that the model shows congestion on Ware High Street. Paragraph 9.11.5 of the TA sets out that journey time impacts for vehicles occur (and could be assumed for public transport) as a result of 'incidents' on Ware High Street, such as slow moving vehicles looking for parking spaces, and the recommendation is made to consider rationalisation of such movements, presumably by reducing on-street parking. However, no indication is provided as to how this is proposed to be achieved. The S-Paramics modelling therefore highlights the need to improve the High Street, not just for pedestrian and cyclists, but also to improve journey times. A significant amount of further work is therefore required to improve the High Street.

As advised above, capacity model assessments have been undertaken for the two accesses (Moles Farm roundabout and Widbury Hill signalised junction). This modelling shows that both of these junctions will operate with capacity in 2035 and are therefore suitable to serve the development.

Monitor and Manage

Chapter 11 of the TA sets out the proposed monitor and manage mitigation package. Whilst this chapter includes some information on the proposed approach, targets, potential mitigation measures and mechanisms to secure any required remediation measures, a significant amount of further information is required as to the details of the monitor and manage approach

Further information is required as to the extent of the proposed contribution and what the monitor and manage contribution will cover. Details as to how the monitor and manage strategy will link into the Travel Plans are also required. If a monitor and manage approach is taken forward for Fanhams Hall Road, a range of mitigation measures need to be developed at this application stage to ensure that any issues are solved efficiently. The key purpose of adopting a monitor and manage approach is to ensure the travel behaviour associated with the development aligns with the assumptions set out in the TA. The monitor and manage strategy must therefore clearly illustrate how the assumptions in the TA can be met by future residents and visitors to the development. The applicant must commit to meeting the assumptions set out in the TA and agree to implement new measures, where required, if the development fails to comply with the assumptions.

Therefore, the mitigation measures identified in Section 11.4 are not sufficiently forward thinking and further work is required to develop the monitor and manage strategy. The applicant is also advised to reconsider the S106 contribution for this approach as a monitor and manage strategy will involve multiple facets, on top of the fund to enable any required changes.

Construction

As highlighted above, great concern is raised to the phasing of the link road in relation to the routing of construction vehicles. Table 12.3 of the TA sets out that the construction routing for each phase of the development, and concern is raised that phase 1C is proposed to solely be accessed via High Street/Widbury Hill. Table 12.6 shows the proposed construction trip generation for 2025, including phase 1C. In 2025, when 25 units of phase 1C are proposed to be constructed, it is anticipated that there will be 32 two way HGV trips and 13 two way employee trips per day. Concern is raised with this level of traffic, especially HGVs, routing through the town, where concerns over excessive HGV movements have already been identified, therefore further consideration must be given to the implementation of a haul road or alternative routing measures.

Further clarity is also sought on the figures relating to the daily two-way construction trips set out in Table 12.5. Whilst paragraph 12.1.2 advises that '*The principles of construction traffic volume have been derived from a proposed site in Birchington, Kent that is comprised of 1,650*

units and new link road. This data has been used to inform the number of HGV and contractor trips that are likely to be generated by the Ware proposals, along with site specific adjustment factors,' no further information appears to have been submitted. Therefore the methodology to justify the figures, including further details of the Birchington site and site-specific adjustment factors, are unclear. The applicant is therefore must further clarity on how these vehicle trip rates have been generated.

Section 12 of the TA includes high level measures as to the construction mitigation and monitoring strategy. Whilst these measures are accepted in principle, given the scale of the project, a separate draft Construction Traffic Management Plan (CTMP) should be provided at the application stage. The draft CTMP should include construction routing drawings, HGV access arrangements, further information on trip rates and more site-specific mitigation measures.

Residential Travel Plan

As this development is a large mixed-use development with multiple occupants, an overarching Framework Travel Plan will be required. The applicant has submitted a Framework Residential Travel Plan. At this outline stage, the Framework Travel Plan is acceptable, although prior to first occupation, should be updated (in consultation with Hertfordshire's Travel Plan team), to accord with our guidance.

In conjunction with the above Framework Travel Plan, the Highway Authority will require Full Travel Plans, including an updated Residential Travel Plan to be submitted for each constituent part of the development. The residential development will require a Full Travel Plan and Evaluation and Support Fee and should be secured by Section 106 agreement in accordance with Hertfordshire County Council's Travel Plan Guidance for Business and Residential Development. This should incorporate measures to promote sustainable transport, an appointed travel plan coordinator and an appropriate monitoring programme.

The Plan should include targets that will be assessed using surveys and which monitor actual trip generation against the predicted trips (including trips by modes) as identified in the TA to confirm the effectiveness of the mitigation measures identified in the Travel Plan.

Where constituent parts of the development, for example, individual residential Travel Plans for parcels are sufficiently large enough to require their own Travel Plans, monitoring will be agreed taking into account the phasing of development.

In support of the Travel Plan, paragraph 6.6.3 of the TA states '*to encourage sustainable travel, the developer proposes to offer a range of short term and long-term tickets. Shorter term tickets would come in the form of travel vouchers. It is recommended that two years free bus travel is offered to every new resident or employee. Assuming the new service commences 2 years from first occupation (approx. 242 units), it is considered that this funding would be in place for either 10 years or once the service becomes commercially viable, whichever occurs sooner.'* This approach is accepted in principle and will help incentivise future residents to use public transport.

School Travel Plan

The primary school, secondary school and Priors Wood School expansion will require separate Travel Plans. School Travel Plans are subject to a separate charging schedule.

The Full Travel Plans should provide an analysis of transport conditions at the proposed site and how pupils are expected to travel. This should include maps of catchment area and expected home locations of pupils and maps of the main access routes from these areas. It should set targets, measures and objectives for new site (to be included in S106 conditions). Furthermore, it should identify measures to be taken during the build and promotion of the

new school to mitigate car use, facilitate sustainable travel, address road safety concerns and progress the targets set in the travel plan.

Personalised Travel Planning

Very limited details have been submitted in reference to the offer of personalised travel planning. Following previous discussions, it was understood that personalised travel planning was going to be offered for all existing residents of Ware, to support behaviour change and a shift to sustainable and active travel. Personalised travel planning has the potential to support a reduction in private vehicles from the existing residents of Ware and increase capacity on the local transport network. Reducing the number of private vehicles on the local highway network would be supported by the Highway Authority and personalised travel planning should seen as a key mitigation measure to unlocking the proposed additional 800 dwellings.

Further information is therefore required to be provided in relation to the proposed personalised travel planning offering, as a mode shift of the existing residents has been considered within the TA assumptions to justify the additional dwellings on the site.

Contributions

Contributions will be sought via the S106 agreement using the recently adopted Guide to Developers Contributions (2021). The guide implements a two-strand approach to planning obligations in order to address the immediate impacts of the new development (first strand), and the cumulative impacts of all development on non-car networks (second strand). The HCC Toolkit can be found here: Planning obligations and developer infrastructure contributions | Hertfordshire County Council.

There are a host of potential S106 measures including, active transport improvements, public transport schemes, travel plans, junction improvements and the monitor and manage scheme which will be secured via S106 contributions and S278 improvements. Once the complete package of measures has been set out and proposed, full details of the S106 contributions can be agreed upon.

It is noted that the S106 will include multiple landowners. Once agreed on the delivery timeframes of the STC and all other transport infrastructure and mitigation schemes, the applicant is advised that all schemes must be implemented in a timely manner and in line with the agreed timeframes.