

North West Harpenden development 5/2023/0327

Dear Sir/Madam

This note provides additional information on the irrelevance of the transport assessment which is one of the grounds on which The Harpenden Society objects to the above planning application.

Yours faithfully

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Committee Member
The Harpenden Society
(home address: 49 West Common Way, Harpenden, AL5 2LQ)

Grounds for objection: the transport assessment is irrelevant

Underpinning the transport assessment are trip rate assessments made using national and HCC databases.

The developers claim (and it appears HCC have accepted these claims) that the trips rates “were calculated from the nationally accepted trip rate database TRICS” (from paragraph 3.1 TPP Traffic Model Note June 2024).

However, whilst TRICS may be a nationally accepted database, the data that the developers have relied upon is **completely incompatible with the transport issues at North West Harpenden** (NWH) and none of the output can reasonably be relied upon to inform the transport assessment at NWH. For HCC to have endorsed the developers work appears to be reckless and one has to question the objectivity applied in reaching this decision.

The National Planning Policy Framework (NPPF) (2024 version) requires councils to ensure:

(d) 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 through a vision-led approach.

116. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios.

Based on the data submitted, it would be extremely challenging to draw any conclusions on the impact of the development on the transport network or the severity of the effects that comply with the NPPF and a proper, relevant analysis using real time data collected on site should be required, at a minimum.

Specific issues with the data include:

For the trip rates from the 2016 Local Plan Transportation Study

- Only one day's trips are measured at each site, and this appears to be a random week day
- None of the sites are in Hertfordshire and most are relatively small sites on the edge of towns in counties a long way from Hertfordshire e.g. Cheshire and Lincolnshire with considerably less people per square mile (see Appendix 3 which contains a table of all counties in the surveys population per square mile)
- Nine of the 11 developments are less than 50% of the size of NWH. It is not easy to compare the housing mixes to North West Harpenden but "Bungalows" aren't expected to feature and the site will not be entirely one type of property as some of these sites are
- No information is available on the topography of the land at these sites, nor details of the existing road provision or accessibility of public transport nor the nearness of employment centres, town centres, community facilities and schools sites so it is not possible to assess whether trip rates are likely or not to be consistent with those expected at NWH. It is unclear whether the population densities near these sites are compatible with Harpenden and its surrounding areas as the ranges are very wide for both 1 mile and 5 miles
- Seven of the surveys were undertaken before 2010, only three are from 2014. Traffic levels generally were considerably lower 14 years ago than they are today. They are therefore out of date and unrepresentative of traffic in 2024 (and in the future)

For the trip rates from the "sensitivity test on TRICS...undertaken in August 2022" similar issues are apparent as well as additional issues:

- Again only one day's trips are measured at each site and these, again, appear to be a random week day
- Again none of the sites are in Hertfordshire. This time six of the 23 sites are coastal villages/towns in East or West Sussex i.e. retirement areas. Four of the sites are in close proximity to one another, just outside Southampton. Seven sites are in sparsely populated counties such as Lincolnshire, Norfolk and Suffolk. A development in Honiton Devon is included too. Three of the trip surveys in the earlier analysis (as above) are included in this analysis!
- 14 of the 23 sites are less than 50% of the size of North West Harpenden
- Again, no information is available on the topography of the land at these sites, nor details of the existing road provision or accessibility of public transport and the nearness of employment, town centres, community facilities and schools sites so it is not possible to assess whether trip rates are likely or not to be consistent with those expected at North West Harpenden. It is unclear whether the population densities near these sites are compatible with Harpenden and its surrounding areas as the ranges are very wide for both 1 mile and 5 miles
- However, it is noticeable that at least six of these sites are in retirement areas which ought to reduce trip rates. Other locations are very close to very large towns/cities where there is likely to be easier access to public transport and very local employment sites
- 12 of the surveys were undertaken before 2020 (in fact three are from 2014 as they're in the above analysis). All the sites post 2020 are for a period June 2021 to December 2021 which was towards the end of the Covid pandemic when transport hadn't recovered

Attached as Appendix 1 is an analysis of the 2016 trip rates. Attached as Appendix 2 is an analysis of the "2022" trip rates. Attached as Appendix 3 is an analysis of population density per square mile for all counties where trip surveys were undertaken (from 2021 census on

population.org.uk). In the latter case, none of the counties surveyed had population densities comparable to Hertfordshire.

Separately, but of equal relevance, is the fact that the measurement of existing levels of traffic have only been taken at a very limited number of places on one date. This is completely inadequate for a permanent and significant development.

Finally, no account has been taken of the cumulative effect of other developments in Harpenden, particularly the Batford development, another large site in the new Local Plan.

Thus, the transport assessment is anything but the “robust” assessment TPP claim it is. Traffic volumes will be considerably more than the Environment Statement assesses and the impacts will therefore be considerably greater than forecast, which is what all of those living near the site have said will be the case and is their current experience with the Cadent works.

How much greater is unknown but the irrelevant analysis provided in the Environment Statement makes any sensible assessment of the impact impossible and the developer should be required to undertake a site specific, relevant analysis so that mitigation can be properly considered or the scale of the development curtailed to avoid severe consequences,

Appendix 1

No	Type of development	Town of survey	Town population	County of survey	Number of dwellings	Date of survey	Single weekday survey	Size compared to NW Harpenden
1	Houses/Flats	Crewe	76,437	Cheshire	174	14/10/2008	Y	41%
2	Semi-Detached/Bungalows	Crewe	76,437	Cheshire	129	14/10/2009	Y	31%
3	Semi-Detached	Corringham	8,884	Essex	237	13/05/2008	Y	56%
4	Mixed Houses	Bracebridge (nr Lincoln)	2,281	Lincolnshire	150	15/05/2007	Y	36%
5	Mixed Houses	Lincoln	103,813	Lincolnshire	186	14/05/2007	Y	44%
6	Semi-Detached and Detached	Scunthorpe	81,576	Lincolnshire	432	12/05/2014	Y	103%
7	Private Houses	Scunthorpe	81,576	Lincolnshire	180	20/05/2014	Y	43%
8	Semi-Detached/Bungalows	Boroughbridge (18m York)	3,405	North Yorkshire	115	14/10/2011	Y	27%
9	Semi-Detached and Terraced	Maidenhall (nr Ipswich)	64,350	Suffolk	125	08/11/2021	Y	30%
10	Terraced	Shrewsbury	76,782	Shropshire	108	11/06/2009	Y	26%
11	Mixed Houses	Horsham	50,934	West Sussex	151	11/12/2014	Y	36%

Appendix 2

No	Type of development	Town of survey	Town population	County of survey	Number of dwellings	Date of survey	Single weekday survey	Size compared to NW Harpenden
1	Houses & Bungalows	Honiton	12,154	Devon	116	25/09/2015	Y	28%
2	Mixed Houses & Flats	Polegate (nr Eastbourne)	9,300	East Sussex	212	11/07/2016	Y	50%
3	Mixed Houses & Flats	Camber (Sands)	1,267	East Sussex	134	15/07/2016	Y	32%
4	Mixed Houses & Flats	Stone Cross (nr Eastbourne)	101,700	East Sussex	99	05/06/2019	Y	24%
5	Mixed Houses	Rayleigh (nr Southend on Sea)	32,150	Essex	123	27/09/2021	Y	29%
6	Mixed Houses & Flats	Eastleigh (nr Southampton)	24,011	Hampshire	243	10/11/2021	Y	58%
7	Mixed Houses & Flats	Hedge End (nr Southampton)	20,790	Hampshire	250	12/10/2021	Y	60%
8	Mixed Houses & Flats	Whiteley (nr Southampton)	New development	Hampshire	270	24/06/2021	Y	64%
9	Mixed Houses & Flats	Waterlooville	64,350	Hampshire	125	08/11/2021	Y	30%
10	Semi-Detached and Terraced	Ditton (nr Maidstone)	4,786	Kent	110	22/09/2017	Y	26%
11	Mixed Houses & Flats	Herne Bay	38,563	Kent	363	27/09/2017	Y	86%
12	Semi-Detached and Detached	Scunthorpe	81,576	Lincolnshire	432	12/05/2014	Y	103%
13	Private Houses	Scunthorpe	81,576	Lincolnshire	180	20/05/2014	Y	43%
14	Mixed Houses	Bradwell	11,628	Norfolk	275	23/09/2019	Y	65%
15	Mixed Houses & Flats	Wymondham	17,496	Norfolk	514	22/09/2021	Y	122%
16	Mixed Houses	Swaffham	8,434	Norfolk	266	23/09/2021	Y	63%
17	Mixed Houses	Horley	22,076	Surrey	207	01/04/2019	Y	49%
18	Mixed Houses & Flats	Ipswich (edge of)	144,957	Suffolk	179	24/06/2021	Y	43%
19	Semi-Detached and Terraced	Ipswich (edge of)	144,957	Suffolk	149	22/06/2021	Y	35%
20	Mixed Houses	Horsham	50,934	West Sussex	151	11/12/2014	Y	36%
21	Mixed Houses	Angmering (between Littlehampton and Worthing)	7,614	West Sussex	180	19/04/2018	Y	43%
22	Mixed Houses & Flats	West Durrington (nr Worthing)	5,528	West Sussex	197	23/06/2021	Y	47%
23	Mixed Houses	Wick (nr Littlehampton)	27,795	West Sussex	117	20/10/2021	Y	28%

Appendix 3

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County	Population (000)	Area sq miles	Population per sq mile
Hertfordshire	1,200	634	1,893
Norfolk	918	2,080	441
Suffolk	763	1,468	520
West Sussex	885	769	1,151
East Sussex	823	692	1,189
Kent	1,858	1,443	1,288
Hampshire	1,860	1,455	1,278
Essex	1,862	1,420	1,311
North Yorkshire	1,157	3,341	346
Cheshire	1,098	905	1,213
Shropshire	510	1,347	379