

# Examination of North Hertfordshire Local Plan

## Highway Authority response to Matters and Issues for the examination

### **Matter 1 Q1.3 - What actions have been taken in relation to the 'duty to cooperate'?**

The County Council raised a range of transportation issues in its Regulation 19 Response dated 30 November (attached for reference). Broadly these concerns emerged from the fact that the latest transport modelling (at that time – November 2016) work undertaken in the County wide transport model (COMET) raised a number of issues which needed to be considered in ongoing local plan work.

Meetings were subsequently held between the County Council and North Herts District Council on 9<sup>th</sup> January 2017 and 9<sup>th</sup> February 2017. The output of that discussion, including identification of further work to be undertaken is outlined in the NHDC & HCC Agreed Direction of Travel document (Examination Ref. MOU3).

The following ongoing actions were agreed: -

- NHDC should develop a **Transport Strategy (TS)** to support and inform the North Herts Plan and associated IDP. The TS should outline how modal shift will take place within the four main towns as well as between towns and villages.
- It was agreed that a further run of the **WHaSH-BL model** would be needed to include interventions outlined in the TS.

### **WHaSH-BL model**

No further modelling work has yet been undertaken.

### **Transport Strategy**

The original scope of the TS agreed between NHDC and HCC is set out at Para 2.6 of MOU3. The intention was to have finalised an agreed TS by July 2017. The County Council has commented on drafts of the TS that have emerged since 8 September 2017 and fully supports the approach is to promote sustainable forms of travel and provide the necessary infrastructure to support this modal shift, but uncertainty remains in terms of delivery.

The implications of the failure to undertake further modelling and of uncertainty with regard to the TS are considered in the County Council's response to Matter 6 Q6.2(a).

**Matter 6 Q6.2(a) Does the Infrastructure delivery Schedule at Appendix 1 of the Infrastructure Delivery Plan [TI1] represent a comprehensive list of the infrastructure needed to facilitate the successful delivery of the housing and other development planned**

The County Council fully supports the approach within the Transport Strategy (TS) to promote sustainable forms of travel and provide the necessary infrastructure to support this modal shift, but uncertainty remains in terms of delivery. It is unclear what weight this document will carry and how its recommendations will be incorporated into the Plan and associated IDP. For example:

- the TS proposes a number of Policies at section 5.14 which are supported and will need to be incorporated into the Local Plan.
- whilst the TS provides the basis from which mitigations can be developed, in many cases these have yet to be progressed. As a consequence of this it is not possible to ascertain at this stage whether the value apportioned to scheme mitigation as identified in Table 5-6 of the TS will be sufficient to secure modal shift and address identified impacts. Furthermore, although the IDP has been revised to reflect the TS it does not clarify responsible bodies or funding sources.
- the updated approach to transport set out in the TS has yet to be tested in relevant transport models. Until this happens uncertainty will inevitably remain and until all the agreed work is completed and mitigations identified and tested it is difficult to know whether the concerns expressed in the County Council's Regulation 19 consultation response will be fully addressed.
- as part of regulation 19 response the County Council raised concerns that a number of areas were forecast to be subject of considerable future congestion. In some respects the TS has identified an approach to transport mitigation in the towns, however, certain areas have not been addressed. These are set out below.

The TS makes a number of references to the County Council leading on transport modelling work for the Local Plan. This is not the case. Clarity of respective roles is set out in the note following the response to this question.

**Baldock**

The proposed developments in Baldock facilitate some key infrastructure, namely a new road associated with the scheme BA1 linking the A507 and A505 (with bridge over the

railway line) and this site also proposes two further railway crossings, one into BA10 and one which provides access to the railway station. Additionally a further link road is proposed as part of developments BA3 and BA4, which provides a link between Wallington Road and B656 Royston Road.

The IDP doesn't appear to include any of this infrastructure, which is fundamental and needs to be included.

Additionally, the approach taken with regards to mitigation at HM3 – Station Rd / Whitehorse Street / Royston Rd / Clothall Rd (as identified in ED14 at Appendix 2 – Highway Impacts and Potential Mitigations) will largely be dependent on the function performed by the link road between the A507 and the A505. It is important that this link strikes the right balance between providing access and enabling through traffic, which in turn may free up junction HM3 to enable some of the highway capacity to be reallocated to more sustainable travel options. There may well be a similar knock on effect to junction NH5 – B656 Hitchin Street / B197 High Street.

This illustrates the need for these junctions to be considered holistically as part of a wider package of measures being pursued as part of the Baldock North development rather than in isolation. In light of the 'Sustainable Spine' concept set out in the TS the Plan should be more prescriptive about what their expectation is of development in terms of enabling sustainable transport across the town and beyond.

### **Letchworth**

The TS sets out the key issues for Letchworth in sections 5.51 – 5.58 and concludes that mitigations proposed in the IDP should be revisited in the context of the 'sustainable spine' proposals put forward in the TS as shown in figures 5.1 & 5.5.

At present the TS proposes scheme NH6 - A505 / Letchworth Gate / B656 / Pixmore Way being dropped from the IDP, as it remains uncoloured in Appendix 2 of the TS, indicating the scheme is not essential for the realisation of the TS. However, NH6 should be given an 'amber' rating meaning the need or not for mitigation would be considered in the wider context of the sustainable spine concept being advocated in the TS. This junction, which is currently a roundabout, is likely to cause north-south severance for non-motorised users. The TS proposal for a sustainable spine runs through this junction which when considered from a sustainability perspective may be identified as a key barrier to mode shift.

### **A1(M) Junction 8 (inc. A602 & B197 corridors form Hitchin and Baldock respectively to Stevenage)**

Of particular concern is the transport impact around A1(M) Junction 8 where there are issues in terms of cumulative impact of growth on the network.

Indications in the countywide transport model (COMET) are that constraints at A1(M) junction 8 lead to traffic re-routing to avoid the junction.

The TS only briefly mentions the A602 corridor in section 5.39. However, as per the approach taken in the TS for the A505, where the concept for a 'sustainable spine' has been developed, it is the County Council's view that the same principle needs to be advanced for the A602. The County Council's position on this issue was set out both in its Regulation 19 consultation response and is identified in Para 2.6 of MOU3:

" ...

- A review of the existing NHDC Local and Strategic Highway network, especially the A505 and A602, detailing the specifics of the network unique to NHDC, rat running routes, any existing issues, AQMA areas and constraints. The Strategy should cover design schemes to ensure drivers are on the correct corridors for their travel needs. This section will also cover a broad range overview of NHDC, towns and villages which create the network and known commuter routes.

... "

Unfortunately this issue has not been explored. Further work is necessary to better understand where people are travelling from and to along the A602 corridor (including parallel local routes) so that a holistic approach can be taken for all those routes. In particular, villages along these corridors are likely to be negatively impacted upon by rat running traffic, including but not limited to, Great Wymondley, Little Wymondley, Todds Green, Titmore Green and Gravely. A balanced package of measures which considers this whole corridor is not sufficiently developed in the TS and therefore not identified in the IDP to demonstrate that a deliverable solution exists.

### **Royston**

The County Council's Regulation 19 consultation response identified the A505 junctions with the A1198 and A10 being forecast to be at capacity by 2031, with long junction delays forecast on Old North Road and in the Town. Both these junctions are identified in the TS as NH3 and NH4 respectively.

The TS sets out that the approach to mitigation should be one of facilitating modal shift and not an approach of highway capacity improvements which would just serve to encourage through traffic, which in turn is likely to lead to a deterioration in the environmental conditions in the town. As a principle this is supported but without developing these concepts further it is difficult to know how deliverable the approach might be or whether the funding identified within Table 5-6 of the TS will be sufficient.

### **Villages**

The County Council has raised concerns about the impact of the proposed Local Plan growth on other North Hertfordshire villages including Knebworth, Gravelly and Codicote. The consensus was that modelling was underplaying the impact on the highway network which needed to be considered further. The TS recognises some of these concerns at section 5.31, but does not then go on to outline potential mitigations. The Plan should also acknowledge these constraints and require the developments being promoted in these villages to contribute to exploring and resolving these issues.

### **Summary**

A number of issues raised in the County Council's Regulation 19 response and agreed in the direction of travel document (MOU3) have not been addressed. Whilst the IDP lists schemes there is little indication of funding mechanisms / viability and without the identified modelling work being undertaken the evidence is not available to demonstrate that the proposed mitigation measures are sufficient to enable the proposed growth to go forward. Furthermore in certain instances mitigations that would be aligned with the TS have yet to be identified. Funding has been reallocated from highway measures and been put towards modal shift headings without any clarity on whether the funding will be sufficient.

As set out in the TS the County Council is preparing a Growth and Transport Plan (GTP) for the area, which includes the main towns in North Herts and Stevenage. The GTP will be consulted on in mid-2018, and will expand upon and the principles and proposals set out in the TS. The concern is that in consideration of the Local Plan we cannot take account of the GTP in our response as it has yet to be completed.

Whilst we cannot be sure at this stage that a deliverable package of mitigations exists for the Towns, the County Council is reasonably confident that solutions could be found. However, cost and deliverability are key to any outcomes that are identified. Our primary concern is the level of uncertainty surround a solution for the A1(M) junction 8 and A602 corridor discussed above. If further work were to be commissioned to explore these issues, with the

aim of identifying a package of measures for inclusion in the IDP in advance of the site specific sessions in February then the County Council would be more comfortable.

*[Note:*

*The respective roles of the local planning authority and the County Council's in terms of the role of the Local Highway Authority (LHA) is set out in 'Hertfordshire County Council's Requirements of Local Plans' document (see attached), which all local planning authorities are familiar with. This document sets out the LHAs evidence requirements for each of the various local plan stages. In summary to inform the process of Local Plan development and review, we run the County Wide transport Model (COMET) twice a year and will seek the latest spatial planning proposals from the Local Planning Authorities (LPAs) to include and inform the process.*

*These model runs help to inform our position on the cumulative impact of growth as set out in Local Plans across the County as well as helping to consider how successful the mitigation being put forward are likely to be.*

*The results will then be formally fed back through the various forums and meetings that take place with the LPAs to help ensure a common understanding of the issues identified from the modelling work and focus discussion, further investigation and development of the most appropriate mitigation measures.*

*In the North Herts and Stevenage area a more detailed local transport model (WHaSH) also exists. This has previously been used to test various local plan allocation options. Whilst the tests were commissioned by NHDC, HCC provided technical support in this process. The WHaSH model has recently been extended to properly cover the Letchworth and Baldock areas potentially allowing mitigation measures to be tested over a wider area.*

*The overall aim of the Requirements of Local Plans document is to ensure that sufficient evidence is available by the time of an Examination in Public (EiP) so that the County Council as LHA are able to support the Development Strategies and Infrastructure Development Plans being brought forward in Local Plans across Hertfordshire and around its borders.]*