

Simon Chivers  
Local Plans  
Welwyn Hatfield Borough Council  
The Campus,  
Welwyn Garden City  
AL8 6AE

Penny Mould  
Asset Manager (Planning) Herts and  
Beds  
Woodlands  
Manton Lane  
Bedford MK41 7LW

Direct Line:

23 February 2017

Dear Simon

### **Consultation on Welwyn Hatfield Pre submission Local Plan 2013 - 2032**

Thank you for inviting Highways England to comment on the Draft Pre-submission Welwyn Hatfield Borough Council Local Plan.

Highways England is responsible for the operation, maintenance and improvement of the Strategic Road Network in England on behalf of the Secretary of the State. In the area within and surrounding Welwyn Hatfield, in particular we have responsibility for the A1 (M) and M25.

Highways England is a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents.

Highways England is aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the Strategic Road Network (SRN) and associated junctions. We cannot be expected to cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour.

We wish to draw your attention to Highways England's (2015) document '*The Strategic Road Network, Planning for the Future: A guide to working with Highways England on planning matters*'. This document sets out how Highways England intends to work with local planning authorities and developers to support the preparation of sound documents which enable the delivery of sustainable development. The document indicates that Highways England will review and provide comments on any amendments to local plans proposed by local planning authorities that have the potential to affect any part of the SRN.

We do not consider it appropriate for Highways England to state its support or objection to particular proposals. Therefore instead my letter clarifies Highways England's views on a number of aspects of the Local Plan primarily focused on proposed development growth, the evidence base, the supporting infrastructure documents and potential funding of infrastructure. We do, however make suggestions in respect of individual sites where we consider that

Highways England would wish specific aspects such as modelling or the promotion of sustainable modes, to be highlighted.

The following sections are based upon our assessment of how the Local Plan addresses Highways England's key matters relating to Local Plan development, as outlined in '*The Strategic Road Network, Planning for the Future: A guide to working with Highways England on planning matters*'.

### **The robustness of the evidence base used in preparing development proposals**

1. We have concerns surrounding the development quantum inputted into the Welwyn Hatfield and Stevenage Hitchin (WHaSH) transport model in comparison to the development quantum set out in Local Plan. Our review of the methodology behind, or the application of, the modelling utilised by the council is currently on going.

### **The sustainability of policies, specifically in relation to potential impacts on and around the SRN**

2. We acknowledge that the sustainability of site specific policies, particularly relating to transport, are centrally covered by Policies 1 to 4 of the overarching strategy. The proposal to prioritise the location of new development on previously developed land and therefore minimising the need to travel is welcomed.
3. We note that the 45% of new homes proposed to be built on previously developed land is based upon the whole Local Plan period, with only 25% of new homes within the period 2022 to 2032 projected to be built on previously developed land. This suggests that there may be greater pressure for development on the existing green belt areas, which may require greater use of the SRN, in the latter half of the Local Plan period.
4. The majority of larger housing sites appear to be predominantly residential only and located on the edges of urban areas. It is unclear from Local Plan how well the proposed employment increase will be balanced by the proposed housing increases in the borough, especially given the existing high in-commuting levels presented in the Local Plan.
5. The Local Plan refers to the promotion of sustainable transport measures, however further details regarding the location and frequency of any increase in public transport provision, other than that provided by developers as part of a Travel Plan, has not been provided within the Local Plan. It is also unclear what impact any measures would have on the SRN in particular.

### **The way in which size, type and location of development proposals have impact on the operation of the SRN (the Impact Assessment)**

6. The WHaSH model, supported by microsimulation modelling, has been used to assess the cumulative impact of planned development. Given the uncertainty relating to the modelling used as the evidence base, the impact of development on the SRN is inherently uncertain.

**The methodology used to determine the quantities, locations, likely phasing and mix, and viability of housing and employment development**

7. A Strategic Housing Market Assessment (SHMA) for residential requirements, and a hybrid employment forecast based upon Experian employment projections and the East of England Forecasting Model for employment requirements, have been utilised to determine the quantities, locations, likely phasing and mix, and viability of housing and employment development. We are content that this methodology is appropriate. There does, however, appear to be a shortfall in the housing provision proposed relative to the numbers identified in the SHMA.

**The economic, social and environmental benefits of the local plan policies and its proposed site allocations; the accessibility of sites that are proposed to be allocated.**

8. We are confident that the Local Plan policies have the potential to provide a number of economic, social and environmental benefits.
9. However, we believe that there is a need to minimise the impacts of proposed high quantity of dwellings located within peripheral and Green Belt areas, particularly in the latter half of the plan period.

**The cumulative impacts on the SRN associated with any known development sites within the plan area and in adjacent areas**

10. Given the previously outlined uncertainty relating to the evidence base modelling, the impact of development on the SRN is inherently uncertain. We note however that the Local Plan acknowledges that the SRN will experience '*additional peak stresses*' at the end of the Local Plan period, although the exact contribution of the proposed growth to these issues is uncertain.

**Proposed enhancements to the transport network, including measures relating to sustainable modes, the delivery/implementation plan including the anticipated costs and funding source(s) as well as the forecast outcome of the enhancement(s)**

11. The Local Plan mentions that any mitigation relating to the effects of increased traffic needs to be set in a context where alternatives to the use of the private car continue to be encouraged, to allow best use of limited space on key parts of the highway network. We welcome this approach to attempt to reduce the number of private car-users at source.
12. Only one SRN mitigation scheme has been proposed, at A1(M) Junction 6, at a cost of approximately £520,000 and proposed to be funded by either one (or a combination of) the Local Growth Deal, the central Government Road Investment Strategy (RIS) or a potential Hertfordshire County Council Growth and Transport Plan contribution.

13. We can see that the need for further schemes, specifically at A1(M) Junctions 3 and 4, have been identified but not addressed as part of the draft Infrastructure Delivery Plan. These schemes are outlined to be too large scale and would require solutions based upon a Road Improvement Strategy or A414 study findings.
14. Comments in the IDP indicate to the effect that: *“there will remain congestion/capacity issues in relation to junctions 3 and 4 of the A1(M) (and the Jack Oldings roundabout in association with junction 4) which do not appear capable of easily being resolved by short term mitigation measures (although there may be the potential for some improvements and these are currently being evaluated) and where it is not yet clear whether more substantial longer term measures will be effective.”*
15. The Local Plan (for example at Policies SP19, SP22 and SP24), indicates the potential need for developers to provide mitigation measures at A1(M) Junctions (specifically A1(M) Junction 4). The form and scale of these improvements is currently unknown, it may however be the case that the long term improvements required could be beyond the gift of the local developers.
16. We feel that it is unclear from the Infrastructure Delivery Plan what the potential is for funding SRN enhancements. The Local Plan document, and a number of site specific policies, outlines that any necessary developer contributions towards ‘*transport services and infrastructure*’ can be obtained via these funding sources, although the Infrastructure Delivery Plan only allocates potential Community Infrastructure Levy or Section 106 funding to local highway mitigation. Highways England request clarification from the council `on the potential for these funding sources to be allocated to SRN projects.

#### **Our investment priorities as identified in our delivery plan and route strategies**

17. The presented mitigation proposals appear to rely upon Highways England’s potential investment priorities, namely through the East of England A1 route strategy which has been conceived as part of ‘Road Improvement Strategy 2’.
18. Given that potential mitigation measures in the A1 route strategy have not been finalised, and ‘Road Improvement Strategy 2’ schemes funding is potentially uncertain, we advise that unless improvement schemes to the Strategic Road Network are already committed it should not be assumed that Highways England will be able to fund required improvements to the Strategic Road Network.
19. It is likely therefore that developers will be a major source of funding for the mitigation measures required. Potentially these could be funded through the Section 106 Contributions or the Community Infrastructure Levy. In the event Community Infrastructure Levy funding is to be used, it is important that the schemes required are identified at an early stage such that the level of contributions required to fund the schemes are known.
20. Highways England would welcome liaison with the Council when development sites likely to impact the SRN come forward, to ensure any necessary improvement schemes at A1(M) Junctions are identified and that Community Infrastructure Levy or Section 106 funding is secured for the required schemes.

## **Any residual impacts arising from the proposals which will not be mitigated by the enhancement measures**

21. As we have not yet confirmed the validity of the modelling, or been able to review the results relating to the council's proposed mitigation measures at A1(M) Junction 6 from the documents available, we have been unable to identify residual impacts with any certainty.
22. It appears the long term improvements required to the A1(M) Junctions 3 and 4 are likely to be considered too substantial for implementation as part of the Local Plan infrastructure provision. It could therefore be assumed that there may be residual impacts at Junctions 3 and 4. This should be addressed in the next iteration of the Local Plan with a clear indication of the anticipated scale of the improvement required to resolve residual impacts (if any) and assumed funding source for the required mitigations measures. By contrast, it is assumed that the measures identified at A1(M) Junction 6 will have no residual impacts once the mitigation measures are in place. Clarification of the residual impacts from the mitigation proposals would be appreciated, potentially in conjunction with any response to point 1 of this letter.

## **Individual Site Suggestions**

Highways England recommends that, as part of any future iteration of the Local Plan, the following proposed allocation sites/policy areas should be clearly identified as needing to assess their impact on relevant SRN junctions as part of the Transport Assessment process, in addition to those already identified within existing iteration of the Local Plan:

- Policy SP17: Mixed Use Development at Broadwater Road West
- Policy SP18: North East of Welwyn Garden City
- Site HS2: Creswick
- Site HS6: Land at Goslings Sports Park, Stanborough Road
- South Hatfield Sites within southern Hatfield (within Policy SADM26)
- Policy SP23: Marshmoor
- Brookmans Park Sites (within Policy SADM31)

We have also identified that the following proposed allocation sites/policy areas have the potential to affect future widening options and create the risk of future noise and air quality issues, owing to their proximity to the SRN boundary:

- Policy SP22: North West Hatfield
- Site HS17: Land rear of 2-12 Great North Road

We welcome the opportunity to respond to the Local Plan consultation and we look forward to continued participation in future consultations and discussions.

In the meantime, if you have any questions with regards to the comments made in my letter,

please do not hesitate to contact me.

Yours sincerely

Penny Mould  
OD East Asset Development  
Email: