

Reg 16 Comment

Respondent: **Hertfordshire County Council - Environment & Infrastructure Department**

Representation:

The following comments have been made in response to the consultation. Several HCC services would like to make representations on the plan and would like to be kept informed with the Neighbourhood plan as it progresses and evolves.

Note: wording highlighted in yellow are amendments to the current Neighbourhood Plan wording.

Highways

Knebworth is a village located in North Hertfordshire, it is just south of Stevenage and north of Welwyn Garden City which are the main nearby towns. There are several smaller settlements adjoining Knebworth including Datchworth, Woolmer Green and Codicote. The A602 operates to the east of village and connects via Stevenage to the A1(M) which is located to the west Knebworth with the village being located between junctions 6 and 7. Knebworth Railway Station is in the centre of the village and provides regular and direct services to London King's Cross and Cambridge. Bus services operate from Knebworth to neighbouring towns including Stevenage Welwyn Garden City and Hatfield.

As the Highway Authority our primary interest is in relation to highway and transport matters. We aim to provide a safe, efficient and resilient transport system that serves the needs of businesses and residents across Hertfordshire whilst minimising impact on the environment. Hertfordshire County Council adopted Local Transport Plan 4 (LTP4) 2018 – 2031 which sets out the long-term transport strategy for the County to accommodate the levels of housing and employment growth being identified by the District Councils in their emerging Local Plans.

LTP4 provides a framework to guide all our future transport planning and investment. It highlights both existing and future transport problems and issues and identifies ways we can deal with them. LTP4 accelerates the transition from a previous transport strategy that was largely car based to a more balanced approach which caters for all forms of transport and seeks to encourage a switch from the private car to sustainable transport (e.g. walking, cycling and passenger transport) wherever possible.

LTP4 Policy 1: Transport User Hierarchy states “to support the creation of built environments that encourage greater and safer use of sustainable transport modes, the County Council will in the design of any scheme and development of any transport strategy consider in the following order:

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

- Other motor vehicle user needs

The County Council are currently developing a number of Growth and Transport Plans (GTP) which will sit as supporting documents to LTP4. Knebworth is included in both the South-Central Growth and North Central Growth and Transport Plan ('SCGTP' and 'NCGTP') as the connecting package for both GTPs on the corridor. The NCGTP is a strategic spatial transport plan consisting of the northern portion of the A1(M) corridor, covering key connections to Luton in the west and Royston in the east and broadly encompasses all of Stevenage Borough and North Hertfordshire District key towns include Stevenage, Hitchin, Letchworth Garden City, and Baldock along with a host of smaller settlements including Knebworth. Each plan will focus on a different area and consider growth and transport challenges in order to improve accessibility to jobs, to key local services and to enhance quality of life. The GTP was developed in partnership with key stakeholders, including District/Borough councils, the Local Enterprise Partnership, Highways England and others, for the purpose of applying Local Transport Plan policies and objectives to a growth-focused area. GTPs aim to facilitate sustainable economic growth and positive change to local communities and their well-being through transport-led improvements. A GTP will identify multi-modal interventions which address transport issues affecting urban areas or inter-urban corridors and will develop and justify packages of transport-led improvement schemes and priority actions. The development of these packages and schemes is based on using robust evidence to underwrite the decision-making process. The draft NC GTP includes a series of suggested schemes and projects related to the Knebworth Area in Package 4 (Stevenage to Welwyn Garden City). These are outlined in more detail in relation to specific objectives and policies below.

Specific Comments

Section 5

Section 5.3

Policy KBLE2 Rural Businesses should include a reference to not generating a traffic impact. This is included as part of KBLE1 New Businesses. Accessibility to such sites should also be a consideration as some rural locations may not be sufficiently served by more sustainable mode options.

Section 5.4

HCC welcomes the changes that have been incorporated within the KBLE3 policy text. The supporting text underneath however still makes no reference to either LTP4 or its hierarchy which emphasises the need to reduce travel in Policy 1 and is further supported within the North Herts Local Plan (emerging) SP9 policy.

Section 6.1

As mentioned in the previous HCC regulation 14 response this section is viewed as a missed opportunity to ensure all new developments contribute to the overall master planning of the village including the provision and standard of provision for accessibility to the key destinations (Station & High Street) by sustainable modes and mobility scooters. Designing in the provision for sustainable travel modes and linkages at the master planning stage to

the key destinations would assist in reducing the need to consider additional parking provision at the station.

Section 6.5 Policy - KBBE4 Design

HCC welcomes the changes that have been made to include reference to cycle storage and charging for electric vehicles, but the emphasis is still upon the provision for cars and parking spaces. More weight should be provided to the sustainable mode provisions.

Section 6.6 Policy -KBBE5 Master planning and Placemaking

Residential parking should be safe and convenient and should not undermine the quality and amenity of streets. Where possible, the predominant parking mode should be on plot to the side/front in the case of houses, or in parking courts for flats.

The focus needs to be on reducing vehicle ownership. Provision and convenience of facilities for cycles including storage and charging should be considered. Reference is now made to North Herts Local Plan (emerging) SP9 Design and Sustainability, but further emphasis could be included.

Section 6.7- 6.9 Policy KBBE6, 7 & 8

Policy wording has been updated however these are strategic sites included within the North Herts Local Plan and these policies do not contain some of the recommended transport related alterations from the Local Plan. These for the most part relate to hooks for cumulative assessment and mitigation to items such as the narrowness of the footways under the railway bridges. Concerns were raised around specific routes in the previous response, a number have now been included within the action plan, however consideration should be given to placing greater emphasis within the policies.

Chapter 10. Policies – Traffic, Transport and Parking

Policy KBT1 - Sustainable modes of Travel has been amended and now appears more robust in its requirements related to sustainable modes, further consideration could however be given to the creation of sustainable corridors to facilitate movement within the developments. HCC would again encourage the opportunity is taken to look further afield and promote cycling if a safe link could be provided to connect to and join up with the segregated cycle network in Stevenage and with national cycle route 12 which currently passes to the West of the village. Consideration needs to be given to the policy to provide a more robust link to the LTP4 user hierarchy. The draft NC GTP recognises the importance of providing an integrated cycle network with the development of a sustainable transport corridor along the B197 (SM93) and the need for the provision of cycling and walking routes from developments to existing cycle routes and the B197 corridor (SM94).

Page 83. It was suggested in the previous response to strengthen the wording relating to the switch to walking and cycling, from may be encouraged to should be encouraged. This is suggested again to support the North Herts Local Plan policy SP9 Design and Sustainability.

Page 83 makes a reference to Hertfordshire County Council Travel Plan (HCC, 2018) regarding predicted car trips increasing by 17-18% across the county, this reference should be changed to Local Transport Plan 4 (2018-2031).

Policy KBT2 - Traffic Impact

HCC acknowledges the change of wording from completed to occupied for funding requirements however other issues raised don't appear to have been considered. The policy includes some of the cumulative impact issues that would be better placed in policies for specific developments – this policy aims to reduce the impact of the developments on the village, however policies within section 6 should be better connected and be less focussed on car parking provision.

Policy KBT3 - On street Parking and KBT4 'High Street' (London Road) Traffic Issues

HCC previously raised a number of issues and concerns with these policies. The policy wording in this consultation still makes the assumption that increasing parking for the shops/railway station is a good thing. Village residents for the most part, should walk/cycle to anything within the village. There is ample parking behind the Co-op for those that cannot walk/cycle. On street parking is exacerbated in certain areas due to commuters who drive to Knebworth to catch the train. The draft NC GTP states that there should generally be a presumption against additional car parking at stations except where a need is demonstrated by evidence and agreed between stakeholders. Therefore a parking assessment would need to be undertaken to establish an understanding and the correct balance required for any additional parking to serve Knebworth railway station. Any proposals for additional car parking at the railway station would have to be considered carefully in conjunction with further controlled parking zones to deter commuters from on street parking.

The policy gives no room for a more pragmatic and holistic approach to parking at new developments, with an automatic assumption that they all must provide "minimum" parking standards or otherwise be refused. This is contrary to LTP4 principles and paragraphs 108-110 of the NPPF. It is understood that heavy roadside parking can cause real problems, but there are a range of measures possible to help reduce car ownership levels and vehicle trip rates, which isn't recognised in the draft plan – and this is a particular shame given Knebworth benefits from a train station and generally good bus networks.

Consider wording of "All types of developments are expected to meet the NHDC's minimum off- street parking provision". With the right sustainable travel incentives and measures, there should be an aspiration for lower on-site parking provision.

Policy KBT4's wording should still be re-considered. The policy cannot be viewed in isolation and should be part of a wider masterplan approach aligned with the development of a sustainable transport corridor along the B197 which is a scheme in the emerging North and South-Central Growth and Transport Plans. It will require a commitment to consider filtered permeability and introducing plugs to the road network to prevent rat running onto less appropriate routes.

Appendix E No 12, mentions the need for additional land for parking. Comments on exclusively providing car parking are provided in this response. This suggestion would need to be considered carefully to ensure it doesn't just encourage car use and would need to take alternative transport modes into account.

Master planning Approach

HCC would once again recommend the Knebworth Neighbourhood Plan seeks to create a masterplan for Knebworth in the context of the proposed growth to ensure that a holistic view for a package of measures is required for the village. This could include proposed diversions of buses, routing of cycle links from developments to the proposed B197 sustainable corridor and NCR 12 along with upgrading walking routes connecting residential areas to the High Street and rail station. This would allow for a more holistic view of sustainable transport for the village and allow for funding to be gathered from all future developments and benefit the village. Consideration should also be given on the implementation and promotion of these changes across the whole village.

There are opportunities to develop a multi modal approach towards sustainable transport, however, there does not appear to be a strategic level approach to modal shift which will need to be considered. Accessibility by all modes of transport should be given consideration in securing the right balance.

Alongside the relevant sustainable transport infrastructure, the strengthening of policies in the Neighbourhood Plan which promote sustainable modes and create a foundation for change in travel behaviour is key. Policies should encourage and enable shorter journeys (including those by existing residents) to be made by sustainable means, including by walking and cycling, given the wider community benefits of active travel

Libraries

7.2.2 Library

The third paragraph in this section requires a few wording changes. The first of which is to avoid wording which can be read as suggesting the library is only open on a Monday. Therefore, these changes are simply for clarity and to bring the text up-to-date.

In 2018 Hertfordshire County Council consulted on the future of library services in the county and, with a requirement to save money, proposed that some of the smaller village libraries should be run by volunteers with support from a central library team. The library opening hours provide access 5 days of the week and the Knebworth volunteers also provide tea, coffee and games while the library is open on Monday afternoons, enabling the community to socialise together. Now completed, the new building could provide the much-needed central space for information on medical, social and local assistance, a hub where local voluntary groups, sports and social clubs can publicise their activities and encourage volunteer recruitment.

Countryside & Rights of Way

HCC Countryside and Rights of Way are responsible for the 3,200km of Public Rights of Way (PROW) Footpaths, Bridleways, Restricted Byways and Byways Open to All Traffic (BOAT) across the county.

Introduction

We are pleased to see that the NP recognises the importance of a multi-modal approach

towards sustainable transport and considers that there is a need to address residents' reliance on motorised transport modes. This accords with Policy 1 of the Hertfordshire Local Transport Plan. Public Rights of Way (PROW) are highways purposed for active travel modes as well as providing a resource for recreational activities such as walking, running, cycling and equestrianism including carriages.

Chapter 7

Para 2. We agree that greenspace has been and will continue to be an important asset locally for people's health and well-being. This statement should also reflect the value of the Rights of Way network in the Parish and beyond for achieving these objectives. Please consider the addition of wording to the sentence 'The importance of such open spaces alongside the Public Rights of Way network was never more obvious...'.

We would recommend that a map showing the PROW network within and beyond the NP area would be appropriate.

This would include a paragraph along the lines of Hertfordshire County Council Countryside & Rights of Way (CROW) service are responsible for the Public Rights of Way network across Hertfordshire. The network of Rights of Way provides significant opportunity for Recreation and Active Travel as set out in Chapters 7 and 10 of this plan. Hertfordshire has a Rights of Way Improvement Plan that sets out the strategic direction for the network and links to the Local Transport Plan. Parish and Town Councils work with CROW to identify improvements to the network.

Given the suggested addition to the above we would recommend the inclusion of PROW in the objectives as follows.
Objectives:
'M Protect, enhance and increase accessibility to and the number of green spaces and Rights of Way for recreational and health use'.

We would recommend the inclusion at 7.4 of the following changes:

Policy KBW3 Recreational Green Spaces and Public Rights of Way

We would also suggest the following text is adopted or adapted to be included in KBW3. Proposals for development must not adversely affect any Public Right of Way and, where possible, should incorporate measures to maintain and enhance the Rights of Way network. The strategic principles of the Hertfordshire County Council Rights of Way Improvement Plan should be adopted where development is being considered

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Chapter 10

Within this chapter please consider distinguishing between a footway/pavement (roadside walkway) and a Footpath (Public Right of Way).

10.1. We are supportive of the aspiration to prioritise active travel both in the NP introduction and Objectives at R in this Chapter.

We would recommend that the Public Rights of Way network be identified as an asset specifically purposed for active travel modes (eg walking and cycling) in addition to its availability for recreation.

10.2

We would recommend an addition to the policy that states:

- a. cycling including electric cycles and public transport
- c. the Rights of Way network might be added to, upgraded and surface provision improved to enable short, everyday journeys on foot or cycle. The strategic principles of the Hertfordshire County Council Rights of Way Improvement Plan should be adopted where development is being considered

We would add to the final para inclusion of the words “and between new development, rail stations, nearby towns and villages and village car parks.

Less More

Full text:

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