

Matter 10 – Transport

Issue 1 – Transport Strategy – Policies SP8 and TRA1

Q1 Is it sufficiently clear when proposals will be required to submit Travel Plans, assess air quality impacts and provide mobility hubs under Policy SP8? Is it effective?

Is it sufficiently clear when proposals will be required to submit Travel Plans

- 1.1 Yes, it is considered to be sufficiently clear when proposals will be required to submit Travel Plans, and provide mobility hubs under Policy SP8, and it is effective. It is considered that main modifications could improve clarity and effectiveness of assessing air quality impacts, by placing more reliance on Policy HW1 – Air and Noise Pollution and deleting SP8 point (f).

Transport Plans

- 1.2 Strategic Policy SP8 - Transport Strategy contains the following requirements for transport plans at d).

The Council will prioritise the use of active and sustainable transport modes and deliver accessibility improvements to the transport and highways network by:

...

d) Requiring all high trip generating uses generating trips in excess of the thresholds set in Hertfordshire County Council's Travel Plan Guidance to prepare, submit and implement Travel Plans to embed sustainable and active travel at an early stage;

- 1.3 The policy cross-refers to thresholds in the Hertfordshire County Council's Travel Plan Guidance which is available online at:
<https://www.hertfordshire.gov.uk/media-library/documents/highways/development-management/travel-plan-guidance.pdf>
- 1.4 Appendix A of that document contains the relevant thresholds for travel plans which are set out below:

7. Appendix A: Development thresholds requiring Travel Plans

Land Use	Measure	Travel Plan Statement	Full Travel Plan
A1 Food retail	Gross Floor Area	>250<800 sq. m	>800 sq. m
A1 Non-food retail	Gross Floor Area	>800<1500 sq. m	>1500 sq. m
A2 Financial and professional services	Gross Floor Area	>100<2500 sq. m	2500 sq. m
A3 Restaurants and cafés	Gross Floor Area	>300<2500 sq. m	>2500 sq. m
A4 Drinking establishments	Gross Floor Area	>300<600 sq. m	>600 sq. m
A5 Hot-food takeaway	Gross Floor Area	>250<500 sq. m	>500 sq. m
B1 Business	Gross Floor Area	>1500<2500 sq. m	>2500 sq. m
B2 General Industry	Gross Floor Area	>2500<4000 sq. m	>4000 sq. m
B8 Storage or distribution	Gross Floor Area	>3000<5000 sq. m	>5000 sq. m
C1 Hotels	Bedrooms	>75<100 bedrooms	>100 bedrooms
C2 Residential institutions – hospitals, nursing homes	Beds	>30<50 beds	>50 beds
C2 Residential institutions – residential education	Students	>50<150 students	>150 students
C2 Residential institutions – institutional hostels	Residents	>250<400 residents	>400 residents
C3 Dwelling houses	Dwelling unit	>50<80 units	>80 units
D1 Non-residential institutions	Gross Floor Area	>500<1000 sq. m	>1000 sq. m
D2 Assembly and leisure	Gross Floor Area	>500<1500 sq. m	>1500 sq. m
Educational establishments	Increase in pupil numbers and/or further development of the site		
Others	Discuss with the county council		
Strategic sites	Larger developments for specified land uses require TRICS SAM monitoring		
C3 Dwelling houses	>250 units		
A1 food retail	>2000 sq. m		

1.5 It is considered that Policy SP8, when read in conjunction with HCC Travel Plan Guidance, provides clear and effective policy.

1.6 It is also considered that the approach accords with NPPF 2023 paragraph 117 which sets out the following:

117. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.

1.7 It is therefore considered that the requirement to submit Travel Plans is clear and effective.

Mobility Hubs

- 1.8 Strategic Policy SP8 - Transport Strategy contains the following requirements for mobility hubs at point j):

j) Supporting a network of local hubs at suitable locations such as railway stations and co-located in city, town and district centres where appropriate. The scale and nature of proposals must be appropriate to the size and function of the centre or station and proposals should contribute towards the vitality of a centre. A local hub should support sustainable travel and can include: a local bus service, car club facilities, bike repair service, e-bike charging, bike share facilities, ride hailing & ride sharing stop, real time and digital travel information, wifi and phone charging, parcel delivery storage lockers and public realm improvements. Local hubs should be supported by online presence and digital functionality

- 1.9 Additional references to mobility hubs are made in Local Plan Part A and Part B, including:

LG3 - Hemel Garden Communities Growth Areas Place Principles

Pillar 2 - Integrated Neighbourhoods...

c) New neighbourhood local centres must be designed in close proximity to schools, the Sustainable Transport Corridor and include mobility hubs;...

TRA2 – Major Transport Schemes...

A) iii) Mobility Hubs located at Land East of Hemel Hempstead in association with HGC;..

Glossary

Mobility (Transport) Hub - A facility that provides a convenient interchange between a range of mobility types (public transport, bikes, scooters etc.) for all users and which is co-located with other community facilities such as cafes, shops, parcel drops etc. For further advice, see CoMoUK Guidance.

H1 - North Hemel Hempstead

Key development requirements...

12. ...An Integrated Mobility hub with facilities to encourage and facilitate modes of transport other than the private car.

H2 - East Hemel Hempstead (North)

Key development requirements...

13. An integrated Mobility hub with facilities to encourage and facilitate modes of transport other than the private car

H3 – East Hemel Hempstead (Central),

Key development requirements..

17. An integrated mobility hub with facilities, to encourage and facilitate modes of transport other than the private car.

H4 - East Hemel Hempstead (South),

Key development requirements...

13. An integrated Mobility hub with facilities to encourage and facilitate modes of transport other than the private car

- 1.10 INF 07.02 - St Albans District LCWIP Final Report (2023) forms part of the local plan evidence base and paragraph 7.1.6 states:

Mobility Hubs are being considered as part of plans to improve public transport services and could be a good opportunity to facilitate and increase multi-modal trips where a mixture of public transport and active transport could help to achieve modal shift for longer journeys. HCC and SADC will explore opportunities for mobility hubs in relevant locations if funding becomes available.

- 1.11 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) states:

Policy SP8 (Transport Strategy) – is a fairly standard policy, however, the approach of supporting a network of 'local hubs' appears to be tailored to the local context. The policy requires: "Supporting a network of local hubs at suitable locations such as railway stations and co-located in city, town and district centres where appropriate. The scale and nature of proposals must be appropriate to the size and function of the centre or station and proposals should contribute towards the vitality of a centre. A local hub should support sustainable travel and can include: a local bus service, car club facilities, bike repair service, e-bike charging, bike share facilities, ride hailing & ride sharing stop, real time and digital travel information, wifi and phone charging, parcel delivery storage lockers and public realm improvements. Local hubs should be supported by online presence and digital functionality."

- 1.12 Mobility Hubs support the prioritisation of sustainable transport modes and fit with the Local Plan Policy Objective 'to prioritise and enable the safe and attractive use of active and sustainable means of transport ...' The Local Plan proposes mobility hubs on named sites and the policy also allows for consideration of mobility hubs if they are proposed at other suitable locations in the future. It is considered that the policy is clear and effective with regard to support for mobility hubs. And when read in cross-reference with other policies in the plan and read in the context of the LCWIP, additional clarity is provided.
- 1.13 It is therefore considered that the approach to mobility hubs is clear and effective.

Air Quality Impacts

- 1.14 Strategic Policy SP8 - Transport Strategy contains the following requirements for assessment of air quality impacts:

f) Requiring new development to assess future air quality impacts from transport, where necessary, including funding contributions to wider schemes that will mitigate the impact of the scheme being proposed where appropriate;

- 1.15 Policy HW1 – Air and Noise Pollution which also addresses air quality and air pollution and is set out below:

HW1 – Air and Noise Pollution

Development proposals, including those for new residential dwellings, schools, nurseries and care homes and other uses which are noise and pollution sensitive, or in areas which may exceed national legislative air quality pollution limits, must carry out suitable assessments for noise / air pollution.

Proposals which are found to be affected by noise or air pollution must demonstrate suitable mitigation, including as required:

- a) Maintaining distances between road and other sources of noise and air pollution (including odour pollution) and people;*
- b) Using green infrastructure, in particular trees, where this can create a barrier or maintain separation between sources of pollution and receptors;*
- c) Appropriate means of filtration, ventilation and soundproofing on affected buildings;*
- d) Effective control of dust and emissions from construction, operation and demolition;*
- e) Use of optimal layout and orientation to promote avoidance of elevated pollution without mitigation which will reduce the level of mitigation where necessary;*
- f) Air quality and / or noise assessments at the earliest stage of development.*

Development proposals that would generate new noise and air pollution in proximity to residential and other noise-sensitive uses must demonstrate and put in place measures to avoid or mitigate any such impacts.

- 1.16 LPCD 03.01 - St Albans Local Plan Sustainability Appraisal Report (2024) states:

9.3 Air and wider environmental quality

9.3.1 The appraisal in Section 6 finds the proposed spatial strategy to perform broadly well relative to alternatives that would involve lower growth or an increased focus of growth at St Albans itself. There is little reason to suggest that the proposed growth strategy gives rise to any significant concerns in respect of worsened air quality within existing problem areas, or otherwise generation of problematic air quality....

9.3.4 In conclusion, a broadly neutral effect is predicted on the baseline, as per the conclusion in 2023. There is little reason to suggest that the proposed growth strategy will conflict with air quality objectives, particularly noting the location of AQMAs within the District and in surrounding areas. HGC is supported, but there is inherently an element of uncertainty and risk around achieving the high levels of modal shift (away from use of the private car) that are being assumed for the purposes of traffic modelling.

- 1.17 On reflection and in light of the above, it is considered that there is no need for two policies to address air quality in this way, that is, in Policy SP8 part f) and Policy

HW1. Policy HW1 – Air and Noise Pollution contains more detail and more focus and provides an appropriate policy basis for assessing planning applications. Therefore, a main modification is proposed that Policy SP8 part f) is deleted. It is considered that this could improve the clarity and effectiveness of the plan.

1.18 The proposed main modification is as follows:

Delete Policy SP8 part f)

~~f) Requiring new development to assess future air quality impacts from transport, where necessary, including funding contributions to wider schemes that will mitigate the impact of the scheme being proposed where appropriate;~~

Is it effective?

1.19 Yes, it considered that the policy is effective with regard to SP8 d) and SP8 j) as explained above.

1.20 However, for the air quality impact as stated in part SP8 f), it is considered that policy HW1 provides an appropriate basis to deal with this matter. Therefore, a main modification is proposed which would delete point f) and improve clarity of the plan.

Q2 What is the justification for the separate requirements under Policy TRA1 based on size?

2.1 Policy TRA1 establishes separate approaches for major and non-major planning applications, reflecting a proportionate approach for applicants in managing transport impacts of proposed development. The justification for this differentiation lies in the inherent differences in scale, complexity, and potential impact between major and smaller-scale developments. It is considered that this approach is proportionate, appropriate and justified.

2.2 Planning applications must comply with TRA1 – Transport Considerations for New Development a) i-iii set out below.

a. Proposals must demonstrate:

i. That safe and suitable access can be provided for walking, cycling and vehicles, accommodating equestrians where appropriate;

ii. That development would not lead to highway safety problems or cause unacceptable impacts upon the transport network; and

iii. Suitable evidence in relation to i. and ii, including the provision of suitable Transport Statements or Transport Assessments along with other appropriate evidence where required.

2.3 Major Development is defined in the Local Plan glossary as:

Major Developments - For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m² or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.

- 2.4 Planning applications for Major Development are subject to additional requirements b) i-x as set out below:

b) Major proposals must demonstrate as appropriate how:

- i. Measures to reduce the need to travel by private car are identified and implemented;*
- ii. Active and sustainable connections to key destinations are deliverable at an early stage of development;*
- iii. The proposed scheme would be served by public transport and would not have a detrimental impact to any existing or planned public transport provision;*
- iv. Safe, direct and convenient routes for active journeys to key destinations are provided and prioritised in their design;*
- v. Comprehensive and coherent integration into the existing pedestrian and cycle, Rights of Way, public transport and road networks will be secured;*
- vi. Adequate servicing arrangements will be provided;*
- vii. The needs of people with disabilities and reduced mobility will be addressed;*
- viii. The charging of plug-in and other ultra-low emission vehicles will be enabled in safe, accessible and convenient locations;*
- ix. Suitable travel plans will be provided and appropriate measures for implementation will be secured. Such plans will set out measures to encourage people to use alternative modes of travel to single occupancy car use; and*
- x. Suitable mechanisms will be provided to secure sustainable transport measures, including delivery of schemes identified in the LCWIP, Bus Service Improvement Plan, Growth & Transport Plan and IDP and improvements to the existing highway network and other appropriate transport mitigations, including as identified in Supporting Documents to the Local Transport Plan.*

- 2.5 Policy TRA1 applies differentiated requirements based on the scale of development to ensure a proportionate response to transport impacts. Major developments - defined by thresholds for residential units, floorspace, or site area - typically generate higher traffic volumes and place greater pressure on transport infrastructure, potentially necessitating more extensive mitigation. Larger development schemes also have greater potential for transformation in line with sustainable travel objectives.
- 2.6 Smaller-scale developments (e.g. 1-9 net dwellings or equivalent business space), which fall below the major development threshold, generally have less impact which corresponds to relatively low levels of mitigation. Household and other very small-scale developments, generally have less impact which corresponds to very low levels of mitigation or no mitigation being required. Applying a tiered approach ensures that assessment and mitigation measures are aligned with the scale and

potential effects of each proposal, supporting effective planning without placing undue burdens on minor schemes.

- 2.7 It is therefore considered that separate requirements under Policy TRA1 based on size are justified.

Q3 Are the requirements under Policy TRA1 consistent with the Framework, which states that 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 would be severe?

- 3.1 Yes, it is considered that the requirements under Policy TRA1 are consistent with the Framework, which states that 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 would be severe. However, clarity could be improved with a main modification.

- 3.2 NPPF 2023 paragraph 115 states that:

115. 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 would be severe.

- 3.3 Policy TRA1 Transport Considerations for New Development ensures that relevant information is submitted with planning applications to enable impacts to be understood and appropriately mitigated where required. It also provides the decision maker with information to form a view as to whether there is an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

- 3.4 It is considered that adding a direct reference in the policy as per the text below would improve clarity. Therefore, a main modification is proposed which adds new text to policy TRA1 – Transport Considerations for New Development at new point c) as follows:

c) 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 would be severe.

- 3.5 It is considered that the requirements under Policy TRA1 are consistent with the Framework, which states that 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 would be severe. And clarity could be improved by adding a main modification as set out above.

- 3.6 NB: There are proposed Main Modification to Policy TRA1 as set out in SADC/ED5A and SADC/ED85C.