

Pirton Parish Council



Parish Clerk:
Mr Stephen Smith
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Simon Ellis  
NHDC

29<sup>th</sup> July 2017

Dear Simon,

**17/00335/1 Application to Discharge Condition 6 to outline planning permission for Land adjacent to Elm Tree Farm Application No 15/01618/1.**

Previously Pirton Parish Council objected to the route utilising Walnut Tree Road Royal Oak Lane and Holwell Road as being unsuitable and unsafe. We are pleased that CALA Homes and the NHDC have accepted that this route is indeed unsuitable and unsafe.

Pirton Parish Council however continues its objection, and the following sets out the views of the Parish Council, acting on behalf of the community of Pirton, in relation to the above application. We have given due consideration to the following documents:

- The Construction Management Plan and Traffic Management Plan proposed by CALA Homes;
- The Waterman Construction Route Plan 30 June 2017;
- The Report by Stomor May 2017 commissioned by the Pirton Parish Council;
- The letter from BAC Partnership March 2017 commissioned by the Holwell Parish Council;
- Comments by members of both the Holwell and Pirton communities;
- Traffic surveys by members of the Pirton Action Group.

We reserve the right to make further comment should further new evidence be brought to our attention.

## **Construction Traffic Management**

**We do not support the proposal to send construction traffic along the B655, down Hitchin Road and Priors Hill, along Shillington road, West Lane and Holwell Road for the following reasons:**

- Contrary to the normal procedure in approving construction traffic routes, this is by far the longest route to an 'A' road which could be chosen, and goes past the largest number of houses of any route through Holwell and/or Pirton.

## **Road Safety Concerns**

- a) The road accident statistics of this proposed route shows that there have been in excess of 50 personal injury accidents recorded by the police since

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Parish Councillors:
Mrs A Smither (Chair),
Mrs D Burleigh, Mr T Gammell, Mr O Lister, Mrs J Rogers, Mr N Rowe, Mrs A Webb

1998, including 2 deaths. What independent risk assessment has been commissioned by Cala?

- b) With a Total Route Length of 2,244M in Pirton, no less than 1,068M, almost half, has no footpath whatsoever.
- c) None of the five roads selected for the route has a footpath on both sides of the road, and three, Holwell Road, Priors Hill and Hitchin Road, do not have any footpaths.
- d) Of the 108 Houses along this route, 52 Houses have direct access onto a footpath, and 56 do not have direct access to a footpath.
- e) In the case of Holwell Road residents, particularly residents of the 12 Apostles, the removal of the right to park in front of their homes will exacerbate the quite unacceptable danger to those leaving their homes by forcing them to step straight out into traffic; their parked cars currently provide protection.
- f) All year round, but particularly during Spring, Summer and Autumn, the proposed route is used extensively (7 days a week) by walkers, runners and particularly cyclists; Pirton is also part of the Chilterns Cycleway. Increasing the volume of both 'heavy' and 'light' construction traffic will adversely impact on road safety for these users in particular.
- g) The proposals do not cover the significantly increased traffic movements that will arise from vehicles used by construction workers, smaller delivery vans, site visitors and so on. This will have a significant safety impact on the whole village.
- h) There are very few footpaths along the roads in Pirton, and many have blind and narrow bends. Whilst the proposal is to restrict deliveries to school hours, we are mindful that our children are not in school for a significant proportion of the year and so will be in increased danger, as they move about the village in holiday periods.

Village and Community Features

- The proposed route will involve the destruction of the Y junction at the northern end of Priors Hill, at a time when the NHDC has recognised this type of junction as part of Pirton's architecture and setting in the landscape.
- The proposals to restrict parking along this route will have a serious impact on the lives of the residents, and will adversely impact the rest of the village, which already has parking issues.
- Pirton's rural roads are not designed for heavy construction traffic. We have recent experience with two small developments within the village. The road widths along the route (see the attached survey) are mostly much less than 5 metres making two-way traffic impossible, where a large construction vehicle is involved.
- The proposed route will not be available when the sewer system for the proposed development is under construction.
- Houses in Holwell Road are historic and old. They have been constructed with shallow foundations and single brick wall density. Continuous heavy construction traffic will likely result in structural damage to these properties.

The Environment

- The designated Heritage Verge along the whole length of Hitchin Road, Pirton is also a Local Wildlife Site (LWS - 11/044). It is noted for its calcareous grassland, which will be hugely vulnerable to destruction by construction traffic driving on the verges. As a priority habitat and a Local Wildlife Site, the area is protected from negative impacts of development by both NPPF and the North Herts Local Plan (current and emerging). There is an obligation on the developer to conserve and enhance biodiversity. At present there is no acknowledgement of impacts on the Local Wildlife Site in the traffic management plan. This means that the proposals are not compliant with either local or national planning policy. The developer needs to provide a strategy that ensures the protection of the LWS from their actions.
- The Pirton Heritage Verge is managed by Pirton Parish Council, in conjunction with the Herts & Middlesex Wildlife Trust (H&MWT) and is the subject of strict grass-cutting management, by Herts County Council. Due to the inevitable impact and damage it will have on wildlife, etc., the H&MWT has recommended that construction traffic should not be allowed to use this road.
- The route along Priors Hill passes a field which is home to badgers, a protected species. Further work should be undertaken by the developer to investigate the best ways to mitigate the disturbance of and danger to these animals, in order to be fully compliant with the NPPF.

Holwell

- The Pirton Parish Council dislikes being put in the position of advocating an in and out route through Holwell Village. However, given the clear advantages in terms of closeness to an 'A' road, and safety issues (only one personal injury accident since 1998, and almost the entire route through Holwell has pavement); we have to conclude that Holwell offers the better solution.
- However, we are very concerned at the suggested changes to Waterloo Lane, involving the destruction of part of the characterful and historic hollow way; and the effect of cutting back vegetation on the local biodiversity.

Hitchin

- The proposals also impact on the residents of Pirton Road, Hitchin (the B655). This increases the number of people whose amenity is adversely affected, and vastly increases the traffic on the B655.
- All construction traffic coming to the site will be forced through Hitchin and around the already difficult and crowded one-way system in Hitchin.
- There must be considerable uncertainty that large rigid construction vehicles en route from Luton, will be able to manoeuvre around the roundabout at the junction of A505 and B655 causing delays and traffic jams in an already often congested area.

On the Construction Management Plan in General:

- The “two strikes threat “ is unrealistic, as CALA will have ordered materials well in advance and these will need to be delivered to a timetable that CALA cannot afford to jeopardise.
- The documents prepared for and by CALA Homes make no mention of the conditions of the road surfaces in Pirton, or offer to make good damage beyond Holwell Road. Offers to survey roads and make good damage are made for Holwell, but none for Pirton roads.
- At page 5 of CALA’s report it states that, “as vehicles exiting the site will not be turning left into Pirton, there will be no disruption to the surrounding properties”. But that same traffic will be approaching the site, having driven along Pirton roads to reach the site, so there will be significant disruption as they approach and enter the site!
- Very little is made of the considerable noise pollution arising from the site and which will be heard across a large part of Pirton Village; a particular nuisance will be caused by reversing warning noise, from all vehicles on site. We understand from the Considerate Contractors Scheme that it is possible to insist that all vehicles entering the site should have “white noise” reversing signal fitted to reduce the adverse impact of noise on residents.

Construction Vehicles and deliveries to the site

- If the swept path analysis remains as that undertaken for the route options dated 25 April 2017, then this will not include the routes in Pirton subject of this consultation. A swept path analysis of all the routes proposed must be undertaken and consulted upon.
- Paragraph 5 of the Cala proposal states that residents of Holwell will be notified of large deliveries. Does this mean that large deliveries will be through Holwell and not Pirton?
- Paragraph 6 deals with forward visibility through Holwell and does not mention Pirton. Has this work been undertaken for Pirton? These two points are examples of the inconsistent way the two routes are assessed.
- Paragraph 4 deals with the supposed reduction in the numbers of vehicles entering the site once the superstructure work is complete. We think that this statement is misleading because (a) on (large) housing projects the time between completion of the last superstructure and completion of the project is often a matter of only a few weeks; (b) right up to completion external works such as landscaping, road construction, pavement/footpath construction, and general planting will be carried out and these activities involve large deliveries, and (c) during the finishing stage after superstructure there may be fewer large construction vehicles, but there will be an increase in the number of smaller vehicles so the overall number per day will not change significantly.
- Page 6 paragraphs 1 to 5 very much overstate the effect on the timetable of the project if Cala were to take at least some of the mitigation action suggested, such as shortening the acceptable delivery times. . We are advised to this effect by an experienced construction professional on our Parish Council. For example, Cala

say that a mobile crane lifts one roof truss a day. If the day is shortened, the mobile crane will need to return for a second day on each building, leading to an increase of 2.5 months in construction time. This really is an exaggeration. Cala will in reality combine days and keep the crane on site overnight. Nor do the figures add up; a large house would involve one crane for a day, as would a pair of semis. A block of flats containing multiple dwellings may stretch in to two days each.

- We note that Cala still want delivery hours to be 9am to 3.30pm. This is not acceptable. Many parents, some with toddlers and babies in pushchairs, will be walking home at this time, often in the road. Deliveries should not commence before 9.30 am. Monday to Friday.

Other Issues

- The proposed route and discussions around safety issues relating to ETF1 does not take into account the latest outline application for ETF2. Being a much larger site, if this is also approved it will more than double the impact along these rural roads and for a much longer period. This must not be allowed to happen.
- As part of what is a charming rural approach to Pirton village, we have already lost part of our countryside to ETF1 and this will additionally displace a significant variety of local wildlife.
- In relation to ETF2, It has been suggested that Pirton residents should walk, cycle or car share to Hitchin. In fact, in the access documentation published by the developer, cycling is the recommended mode for people using the station for work in London. So residents are expected to cycle through heavy construction traffic for 3 years. Clearly no rational thought has been given to this. This is extremely naïve and is dismissive of people's safety.
- Local footpaths are also bridle ways around Pirton and are more like a mud bath in winter. You could not walk or cycle to work or anywhere else, using these routes.

In Conclusion:

- Routes via Pirton to the nearest 'A' road would be 3.5 miles/7 minutes to the A505, Hitchin, 5.5 miles/13 minutes via Shillington to the A600 or 5.2 miles/10 minutes to the A6 at Barton-le-Clay. Access via Hitchin will impact on the already busy B655 road and also on the protected LWS Heritage Verge.
- Pirton is a Category A village with the associated pedestrian footfall.
- All routes through the village are narrow, often lack footpaths, have houses opening directly onto the road and have tight bends and pinch points (see the attached Road Widths Survey).
- The unrestricted construction traffic will impact the local rural lanes, and village streets, as such 'light' construction traffic will have access to all roads within Pirton village (See the attached peak morning Traffic Survey, and full working day Traffic Survey at Hitchin Road, Pirton)

- None of the routes through Pirton is suitable or safe for the amount of traffic which will be generated by such a large development, in a rural setting in the countryside.
- Overall, the Cala Report contains inconsistencies and inaccuracies; it is not even-handed in its assessment of the routes through Holwell and Pirton.
- The Planning Officers have recognised the importance of the Construction and Traffic Management Plan by unusually bringing it to the Planning Committee. The documentation supporting the application for discharge of Condition 6 should therefore be clear and precise. It is neither. For this and the above reasons, Condition 6 should not be discharged.

Yours sincerely

Pirton Parish Council

Alison Smither

Chair

**Road Width Measurements,
Length of Footpaths, and Numbers of Houses
Along the Construction Traffic Route for ETF1**

Holwell Road:

Road Widths: Measured from the Site Entrance:

	<u>Measuring Point:</u>	<u>Road Width</u>
17 Houses without a footpath		
No Footpath on Holwell Road	At site Entrance	5.20M
	At 68M from Site Entrance	4.30M
	At 125M from Site Entrance	5.50M
	At 150M from Site Entrance	5.40M

West Lane; At Junction with Royal Oak Lane 4.85M

Footpath along only one side of West Lane At 70M from Junction with ROL
4.80M

27 Houses with Footpath At 105M from Junction with ROL 4.85M

2 Houses without Footpath At 195M from Junction with ROL 4.60M

At 285M from Junction with ROL 5.25M

At 335M from Junction with ROL 4.30M

At 420M from Junction with ROL 4.45M

At 520M from Junction with ROL 5.50M

At 610M from Junction with ROL 4.85M

At 645M from Junction with ROL 4.40M

Shillington Road At Edge of Knoll 3.80M

Footpath along only one side of Shillington Rd. At 60M from Edge of Knoll
4.70M

25 Houses with Footpath At 110M from Edge of Knoll 4.80M

17 Houses without a Footpath At 220M from Edge of Knoll 4.25M

At 326M from Edge of Knoll 5.30M

At 426M from Edge of Knoll 5.60M

At 531M – End of Shilling Rd. 6.00M

Hitchin Road, Pirton:

Total number of houses: 8

No pavement on either side of the road.

The road surface has clearly been repaired several times, and rough patches and cracks are common.

It is wide enough for two way traffic, but is less than 5M in places.

Priors Hill:

Total number of houses: 12

There are no pavements on either side of the road. There is a small green verge outside of Orchard Lodge (though it is private property); and green verge at Danefield.

Although taking two-way traffic, the road narrows significantly from Hill Farm down to the junction with Shillington Road. The road has been resurfaced recently from the junction with Danefield down to Shillington road.

Overall:

With a Total Route Length of 2,244M in Pirton, no less than 1,068M, almost half, has no footpath whatsoever, where residents and/or their children, will be walking in the road. None of these five roads has a footpath on both sides of the road, and three, Holwell Road, Priors Hill and Hitchin Road, do not have any footpaths.

Of the 108 Houses along this route, 52 Houses have direct access onto a footpath, and 56 do not have direct access to a footpath.

**TRAFFIC USAGE - HITCHIN ROAD, PIRTON - MONDAY 17TH JULY
2017**

TIME	CARS & VANS	LARGE VANS	LORRIES 10 ton	LORRIES > 20 ton	M/C & BIKES	Total / Category
8.00	93	11	3	1	2	110
8.30	45	5	0	2	0	52
9.00	56	5	1	3	2	67
9.30	49	6	0	1*	0	56
10.00	41	6	0	0	1	48
10.30	39	8	1	3**	0	51
11.00	37	5	1	1**	1	45
11.30	44	8	0	0	1	53
12.00	53	7	2	2	0	64
12.30	68	2	3	3	1	77
13.00	41	11	0	0	2	54
13.30	43	4	2	2	1	53
14.00	52	4	0	0	0	56
14.30	32	5	1	1*	1	40
15.00	55	5	0	1**	0	61
15.30	74	10	0	1**	1	86
16.00	67	8	0	1**	2	78
16.30	90	7	0	1**	2	100
17.00	77	11	11	0	3	102
17.30	133	8	8	2**	2	153
18.00	78	6	6	0	0	90
18.30	83	4	4	1*	0	92
Total 11 Hours	1,350	146	43	13	22	1,588

**** HEAVY FARM TRAFFIC**

*** BUSES
(COMPILED BY PIRTON ACTION GROUP)**