

Land to rear of
112-156B Harpenden Road
St Albans
Hertfordshire

Non Material Amendment - Changes to off-site highways works of planning permission 5/2021/0423 dated 12/01/2022 for Outline application (access sought) - Residential development of up to 150 dwellings together with all associated works

(LPA Ref. 5/2023/1426)

Transport Note 6021/1

Prepared on behalf of:

Save North St Albans Green Belt Community Action Group
43 Harpenden Road
St Albans
AL3 6BJ

August 2023

1 SCOPE OF THIS TRANSPORT NOTE

- 1.1 That Consultancy has been instructed by Save North St Albans Green Belt Community Action Group to review the highway safety issues associated with planning application 5/2023/1426.

2 MAIN FINDINGS

- 2.1 The main findings arising from our review of the developers proposed off-site highway works on Harpenden Road are:
- the proposals will create major highway safety problems by bringing pedestrians and cyclists into conflict with one another, with vehicles entering and leaving the premises along Harpenden Road and with vehicles travelling along Harpenden Road.
 - The proposals do not align with the objectives, design standards and guidance set out in Local Transport Note (LTN) 1/20 “Cycle Infrastructure Design” (July 2020, Department For Transport). This document provides a basis for the Local Cycling and Walking Infrastructure Plan (July 2023, HCC/SADC) and the County Council’s emerging highway design guide.
 - this being the case we conclude that the revised plans are unacceptable on highway safety grounds.

3 PLANNING APPLICATION 5/2023/1426

- 3.1 Condition 14 of planning application 5/2021/0423 states:

“Condition 14. (Part A) Notwithstanding the details indicated on the submitted drawings no on-site works above slab level shall commence until a detailed scheme for the offsite highway improvement works as indicated on drawings numbered (19197/002/001 Rev D, 002/02 Rev C, 002/03 Rev F, 002/04 Rev C, 002/05 Rev C, 002/06 Rev G) have been submitted to and approved in writing by the Local Planning Authority. For the avoidance of doubt, this shall include all offsite works, including but not limited to, the site access works, highway, footway, cycleway and bus stop enhancements.”

(Part B) Prior to the first occupation of the development hereby permitted the offsite highway improvement works referred to in Part A of this condition shall be completed in accordance with the approved details.”

3.2 The current planning application as originally submitted sought to substitute the 6 indicative plans referenced in the above condition with 6 revised plans, these being:

19197/002/01/F

19197/002/02/E

19197/002/03/H

19197/002/04/F

19197/002/05/E

19197/002/06/I

3.3 On 22 August 2023 two of the 6 revised plans were revised once again, these being:

19197/002/05/F

19197/002/06/J

3.4 Each of the original 6 illustrative drawings included a typical cross-section showing the proposed standard of highway provision at different locations in the study area. These cross sections set out the proposed width of the carriageway, footway, cycleway and shared footway/cycleway.

3.5 Unfortunately the latest set of 6 drawings do not show any cross sections even though the locations of 10 cross sections (labelled A – O) are identified on the plans. We assume that this information has been made available to the highway and planning authorities, but it has not been put in the public domain.

3.6 The applicant has not submitted any detailed description of the revised plans, nor have they submitted any technical report to explain and support the changes. In the covering letter submitted with the planning application the applicant’s agent, DLA Town Planning, state:

“The changes themselves arise from more detailed topographical survey work of the length of Harpenden Road. At various points there are retaining walls alongside the highway which, although within the adopted highway boundary, would be quite disruptive for residents were they to be removed. The revised indicative plans retain these features in place. The proposed stepped footway/cycle is largely retained although in places it is reduced to a combined footway/cycleway.”

- 3.7 Close examination of the revised plans shows that the applicant is now proposing to reduce the carriageway width on Harpenden Road to 6 m on the hill to the north of the Harpenden Road/Beech Road/Batchwood Drive signal controlled junction. In conjunction with this change the applicant is also proposing to provide a 3 m wide shared footway/cycleway on the western side of Harpenden Road rather than the 2m stepped cycleway and 2m footway as originally proposed.
- 3.8 This is a fundamental change that conflicts with best practice guidance as set out in LTN 1/20 which discourages the use of shared surfaces. This change will have a significant adverse impact on highway safety.
- 3.9 Table 1 below summarises the level of provision proposed by the developer for cyclists and pedestrians along the 870 m long section of Harpenden Road to the north and signal controlled junction.

Level of provision	Northbound	Southbound
Footway (2 m)	50 m	385 m
Shared footway/cycleway (3 m)	290 m	0 m
Shared footway/cycleway (4 m)	0 m	85 m
Stepped cycleway (2 m) + footway (2 m)	530 m	400 m
Total length	870 m	870 m

Table 1 The Proposed Standard of Provision for Pedestrians and Cyclists

- 3.10 The most serious area of concern we have identified relates to the latest proposal to provide a 200 m long section of shared footway/cycleway (3 m wide) on the western side of Harpenden Road between its junctions with Francis Avenue and Green Lane.
- 3.11 Indeed the second of the 22 “summary principles” set out in LTN 1/20 explains that:
“2 Cycles must be treated as vehicles and not as pedestrians. On urban streets, cyclists must be physically separated from pedestrians and should not share space with pedestrians.”

Comment

- 3.12 The revised proposals clearly conflict with the best practice guidance set out in LTN 1/20 and will have an adverse impact on highway safety.

4 THE PRESENT-DAY SITUATION

4.1 At present there are cycle facilities on Harpenden Road (A1081). They do not, however, continue along most of the 900 m section of Harpenden Road that is the subject of the developers latest proposals. Instead they bypass this section of highway, either to the west or the east.

4.2 Figure 1 below is an extract from SADC's "St Albans City and District Cycling Map" (July 2019).

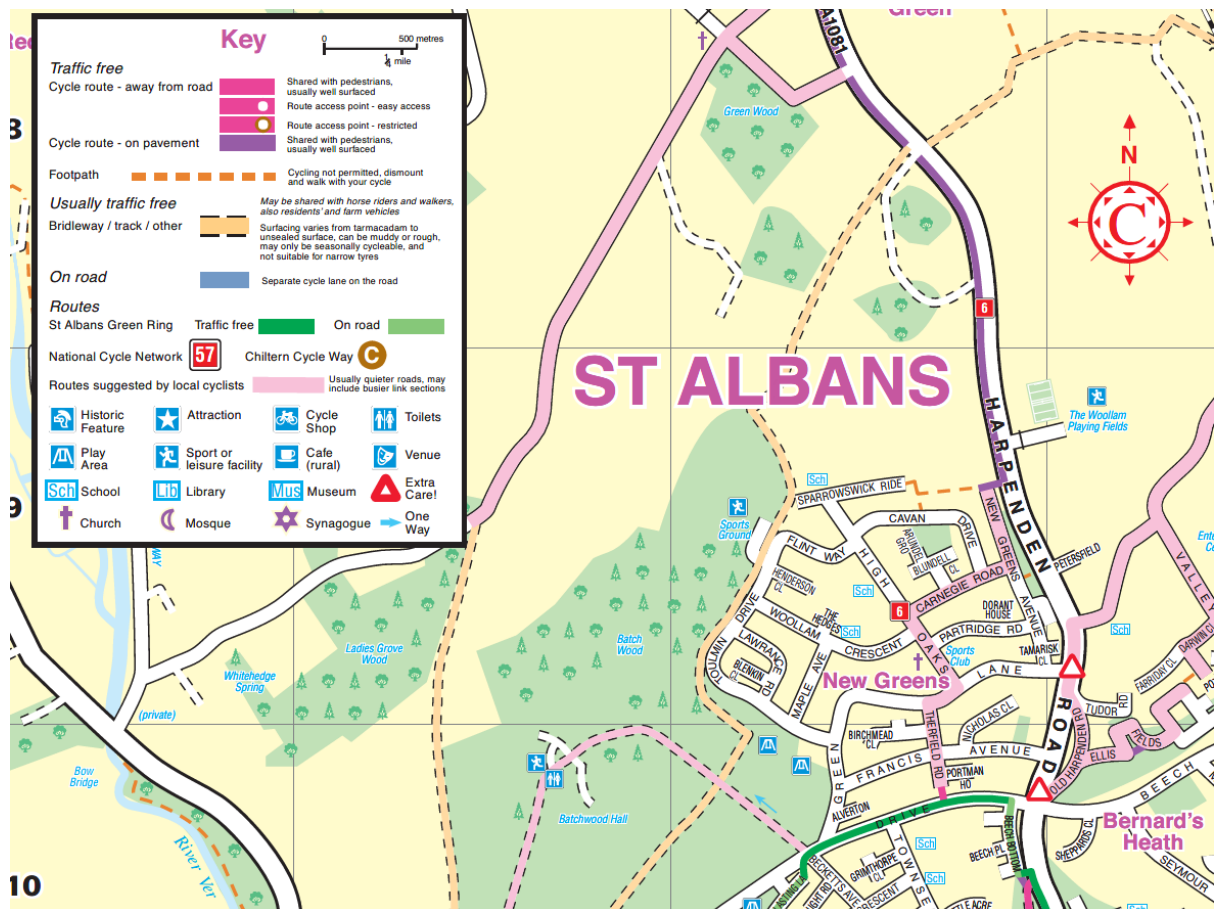


Figure 1 Extract from "St Albans City and District Cycling Map" (July 2019)

4.3 It will be noted that:

- National Cycle Route 6 routes along Harpenden Road to the north of the study area but then diverts onto the minor residential roads to the west before rejoining Harpenden Road to the south of the Harpenden Road/Beech Road/Batchwood Drive signal controlled junction.
- The southbound cycle route diverts off Harpenden Road onto Old Harpenden Road before rejoining Harpenden Road at the signal controlled junction.

- The section of Harpenden Road to the north of the signal controlled junction is identified on the map as being an area where cyclists should take “extra care”.

4.4 It is clear therefore that the section of Harpenden Road that is the subject of the current planning application is a section of highway that has already been identified as being dangerous for cyclists.

4.5 The area identified as being particularly dangerous i.e. the hill to the north of the signal controlled junction, is the section of highway where the developer is now proposing to reduce the overall standard of provision for cyclists and pedestrians in conjunction with reducing the carriageway width along this section of Harpenden Road.

5 ST ALBANS DISTRICT LOCAL CYCLING AND WALKING INFRASTRUCTURE PLAN (LCWIP) (JULY 2023) (HCC/SADC)

St Albans/Harpenden link

5.1 The LCWIP’s proposals for the A1081 as set out on HCC’s website are:

“The A1081 provides an important link between St Albans and Harpenden. This route is less than 5 miles long and could be cycled by many people in less than half an hour.

While there is a shared use path available on part of this route, we are proposing a fully segregated cycle way along the full length of the A1081 between Harpenden and St Albans. By separating people walking and cycling, more people could walk and cycle safely without the risk of conflict. This will be accompanied by protected facilities at all junctions along the route, and a major junction improvement at either end.”

Comment

5.2 The developers latest proposals do not provide a fully segregated cycleway along the A1081. The proposals therefore conflict with the LCWIP’s specific proposals for the A1081 corridor.

6 SHARED USE

6.1 LTN 1/20 discourages shared use footways. Indeed at paragraph 6.5.4 it states:

“In urban areas, the conversion of a footway to shared use should be regarded as a last resort. Shared use facilities are generally not favoured by either pedestrians or cyclists, particular when flows are high.”

6.2 Table 6.3 of LTN 1/20 sets a recommended minimum width for a shared route of 3.0m. This is the standard that the developer now proposes along the western side of Harpenden Road. The text accompanying Table 6.3 states “wherever possible, and where pedestrian flows are higher, greater widths should be used to reduce conflict.”

6.3 In the list of possible “Intervention Types” described in the LCWIP there is no mention of shared use other than to note that such proposals are discouraged by LTN 1/20.

Comment

6.4 By proposing to create a long stretch of minimum width shared surface the developers latest proposals clearly conflict with the guidance set out in LTN 1/20.

7 SEPARATION BETWEEN CARRIAGEWAY AND CYCLE TRACK

7.1 Table 6.1 of LTN 1/20 sets out minimum recommended horizontal separation between carriageway and cycle tracks. For a speed limit of 30 mph the “desirable minimum horizontal separation” is 0.5 m and the “absolute minimum” is 0 metres.

Comment

7.2 It will be noted that the developer does not propose to provide any separation between the cycle track and the carriageway at any location within the study area.

7.3 This is undesirable anywhere that cyclists are routed alongside a carriageway.

7.4 It is particularly undesirable, and unsafe, on the long section of shared footway/cycleway now proposed along the hill on Harpenden Road. The proposed shared footway/cycleway is already the minimum width set out in LTN 1/20. Remembering of course that LTN 1/20 discourages the use of shared footway/cycleways in any event.

8 HIGHWAY SAFETY

8.1 We have already established that the proposed off-site highway works are unacceptable in principle. We now consider highway safety issues associated with the site specific characteristics of the 200 m long section of Harpenden Road where the developer now proposes to provide only a 3 m wide shared footway/cycleway.

Cycle design speed & gradient

8.2 The section of Harpenden Road where it is now proposed to provide a 3 m wide shared footway/cycleway on the western (i.e. northbound) side is located on a hill. Harpenden Road falls at a gradient of approximately 4.1% on the southbound approach to the signal Junction.

8.3 Table 5.4 of LTN 1/20 presents “Design Speed for off Carriageway Cycle Routes”. The typical design speed is 30 km/h which equates to a minimum stopping sight distance of 31 m (Ref Table 5.5: Stopping Sight Distances). With a downhill gradient of more than 3% (which is the case here) then the design speed increases to 40 km/h and the stopping sight distance increases to 47 m.

Frontage development

8.4 There is frontage residential development along the western side of Harpenden Road for the entire length of the proposed section of shared footway/cycleway. These properties have individual private drives with dropped kerb access to/from Harpenden Road. The majority of the properties do not have on-site turning facilities. This means that drivers must either reverse into, or out of, their properties.

8.5 The private drives meet Harpenden Road on a downhill gradient. Each of the properties has a retaining wall and embankment along their site frontage. We understand from the information submitted by the applicant that each of these retaining walls and embankments is a highway structure and therefore the responsibility of the local highway authority. The retaining walls and embankments severely restrict visibility for vehicles turning out of the private drives.

Conflict points

8.6 There are 15 private drive accesses along the western side of this stretch of Harpenden Road. Each of these represent a conflict point whereby a vehicle entering/leaving the site could be in conflict with pedestrians or cyclists passing in front of the site, or with vehicles travelling along Harpenden Road.

- 8.7 Pedestrians and cyclists travelling on the shared footway/cycleway will, potentially, be in conflict with each other. If cyclists choose to travel southbound along this stretch of shared footway/cycleway then they are likely to be travelling at high speed (over 25 mph according to LTN 1/20) given a downhill gradient and will be potentially in conflict with all the other users of this route. Stopping sight distance for a cyclist travelling at this speed is in the order of 50 m.

Visibility at driveways

- 8.8 At present a driver coming out of their property has virtually zero visibility until they have blocked the footway. In future a driver coming out of their property will have virtually zero visibility of the shared footway/cycleway. A driver leaving in a forward gear will have driven across almost the full width of the footway/cycleway before the driver can see along the footway/cycleway and Harpenden Road. A driver reversing out of their drive will completely block the shared footway/cycleway before they can see along the shared footway/cycleway and Harpenden Road.
- 8.9 In practice therefore the onus will be on a pedestrian or cyclist travelling along the shared footway/cycleway to be aware of vehicles entering/leaving the private drives and to stop, or take evasive action, as necessary. The onus is on pedestrians and cyclists simply because there is little or no visibility from the private drives.
- 8.10 The obvious highway safety problems arising from the situation are compounded by the fact that pedestrians and cyclists will have very restricted visibility of vehicles leaving a property because of the retaining walls.
- 8.11 Obviously if a pedestrian or cyclist has to take evasive action then they are likely to walk/swerve into the path of other pedestrians/cyclists or, potentially, into the path of a vehicle on Harpenden Road.
- 8.12 We note from the information submitted by the applicant that they are now proposing a 3 m shared footway/cycleway rather than the segregated facility previously proposed simply to avoid the technical difficulties, and costs, associated with improving the private drive accesses and associated retaining structures to create a safe environment for all highway users and particularly cyclists and pedestrians.

Comment

- 8.13 The current proposals raise serious highway safety concerns, and will exacerbate existing difficulties, on a section of Harpenden Road that has already been identified as a dangerous road for cyclists. Both the existing cycle routes along Harpenden Road bypass this section of Harpenden Road.
- 8.14 We therefore suggest that it is wholly inappropriate to consider any cycle/pedestrian facilities that do not fully conform with current best practice guidance and policy.

9 OTHER AREAS OF CONCERN

- 9.1 In addition to our concerns relating to the proposed section of shared footway/cycleway we also have concerns relating to the proposed site access and the Harpenden Road/Beech Road/Batchwood Drive signal controlled junction.
- 9.2 With respect to the proposed site access we note that the visibility splays to the edge of the cycle lane are only 70 m long. This equates to a design speed of only 20 km/h (12 mph). We consider this speed to be unrealistically low and suggest that larger visibility splay should be provided.
- 9.3 We also note that it is proposed to provide a 5.5 m carriageway with a 3 m shared footway/cycleway along one side of the carriageway and a 2 m footway on the other. Given the guidance set out in LTN 1/20 and in the LCWIP we suggest that segregated facilities should be provided. If the proposed Toucan crossing is to provide a link for cyclists between the application site and the western side of Harpenden Road, including The National Cycle Network 6, then we suggest some other form of crossing that does not rely on shared use which is discouraged in LTN 1/20.
- 9.4 It is not clear from the plans what, if any, improvements are to be made at the Harpenden Road/Beech Road/Batchwood Drive signal controlled junction. We suggest that the applicant should provide further information explaining what, if anything, is to be done at this junction in conjunction with their off-site works.

10 ROAD SAFETY AUDIT

10.1 We note that the applicants have not submitted a road safety audit in respect of their latest proposals. We strongly recommend that if the local planning authority is minded to approve this application despite the concerns we have raised, then the LPA should only do so after having received a satisfactory independent road safety audit of the scheme.

11 CONCLUSIONS

11.1 The main findings arising from our review of the developers proposed off-site highway works on Harpenden Road are:

- the proposals will create major highway safety problems by bringing pedestrians and cyclists into conflict with one another, with vehicles entering and leaving the premises along Harpenden Road and with vehicles travelling along Harpenden Road.
- The proposals do not align with the objectives, design standards and guidance set out in Local Transport Note (LTN) 1/20 “Cycle Infrastructure Design” (July 2020, Department For Transport). This document provides a basis for the Local Cycling and Walking Infrastructure Plan (July 2023, HCC/SADC) and the County Council’s emerging highway design guide.
- this being the case we conclude that the revised plans are unacceptable on highway safety grounds.

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