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To whom it may concern,

Objection – Development on Mill Lane, Hatfield Heath, CM22 7AA

EAS Transport Planning Ltd have been commissioned to produce an objection letter against the proposed developments on Mill Lane.

This letter concerns the following planning applications:

- UTT/23/1688/FUL – Camp Poultry Farm, Mill Lane, Hatfield Heath, Bishops Stortford CM22 7AA – Site redevelopment involving demolition of buildings (in B8 and ancillary Use) and erection of storage, packing, distribution and ancillary buildings (B8 Use). Erection of 1 no. dwelling house with residential garden and related change of use of land. All related works, landscaping and infrastructure
- UTT/24/0103/PINS – Land To The West Of Mill Lane, Hatfield Heath - The demolition of 12 no. existing structures, the conversion and restoration of 8 no. existing buildings to form 8 no. holiday cottages and 1 no. dwelling, the construction of 3 no. single storey dwellings. The creation of a pedestrian and cycle link path

As well as any new development potentially leading to vehicle movement intensification along Mill Lane.

As demonstrated within this letter, Mill Lane is already subject to excessive traffic flows that cause issues for residents' safety and quality of life. As such, it is the opinion of EAS that the above proposals pose a significant risk in regards to highway safety, particularly to the most vulnerable road users.

Detailed within this letter are a number of concerns related to these proposed developments, taking into account the current highways and transport context along Mill Lane.

Existing Site Context

Mill Lane is located in the northwestern part of Hatfield Heath. It is a historic lane connecting the A1060 to The Camp Poultry Farm, which currently is operated by Greenway Eggs. Historically the farm operated as an egg production facility, though the operations have now transitioned into egg packing and distribution.

Mill Lane also provides access to former Prisoner of War Camp 116, which was in operation during the Second World War, though it is currently in a derelict state. The remaining properties accessed from Mill Lane include a commercial barn/building (currently housing Invictus Motors, a used car dealership), a care home, and number of residential properties.

The majority of the properties are accessed from Mill Lane within the first 100 metres of the road. In general terms, based off of the physical attributes of the road, Mill Lane can be separated into three

sections; one covering the first 60 metres of the road (starting from the junction with A1060); a second from 60 to approximately 170 metres; and the third one, approximately 200 metres long.

The first section starts with a reasonably wide bell mouth, which provides access to Hatfield Haven Care Home, located just on the corner of Mill Lane and the A1060. The road narrows from the bell mouth to the northern end of the care home plot where it forms an approximately 3.5 metre wide pinch point. Following this, the road slightly widens to approximately 4 – 4.3 metres and provides access to residential properties, with driveways adjoining the Lane.



Photo 1 & 2 – First Section of Mill Lane.

The second section of the road starts at the location of the former Prisoner of War camp land, running through to the section where Public Right of Way (PRoW) Footpath Hatfield Heath 12 provides a pedestrian connection to another residential estate on Broomfields. This section of Mill Lane is approximately 4.5 to 6 metres wide (including areas of soft verge frequently overridden by vehicles) and provides access to the properties at the Chapmans and the former Prisoner of War Camp 116.



Photo 3 & 4 – Second Section of Mill Lane.

The third, last section of Mill Lane is an approximately 3.3 metre wide single track leading from the PRoW footway connection to the Camp Farm gates. This section provides access to the Field House and Mill End residential properties, Camp Farm and a commercial building/barn currently housing a used car dealership (Invictus Motors).



Photo 5 – Third Section of Mill Lane (source: Google Earth Pro™).

It is important to note that Mill Lane is already subject to significant vehicular movement, owed to the location of Greenway Eggs and Invictus Motors, alongside the traffic generated from the long-standing residential dwellings along the road. There are numerous goods vehicles, ranging in size from panel vans to articulated lorries, using the road.

In addition, it has to be noted that the Lane, in particular the first and second sections of it, are frequently used by pedestrians connecting to the bus stop, located on the A1060. A local School Bus pickup location is also set at the junction of Mill Lane and A1060, which leads to a number of school children using Mill Lane and the PRow connection on daily basis.

The road is clearly not suited to accommodate all movements together and much be considered as an existing highway safety concern, especially in the first section of the Lane. There is plentiful evidence of vehicles damaging properties with the most obvious being the roof corner of the care home being clipped number of times by HGVs accessing the road or residents front fencing being knocked over by manoeuvring lorries and vans when they are attempting to pass each-other in the narrower parts of the Lane.



Photo 6 – A HGV attempting to navigate past the Hatfield Haven Care Home.

Taking into account Mill Lane's narrow width, combined with its primarily residential nature and lack of footway provisions, it is clear that the presence of HGVs along this road already poses a substantial safety risk, especially to pedestrians.

Based on the data submitted with the currently open planning applications, Mill Lane is being used by 5 to 23 vehicles per hour with high percentage (approximately 25 to 50%) goods vehicles (vans and HGVs). It has to be however highlighted that the data was collected in 2016, which currently it would make it 8 years old, which is far beyond the industry accepted 3 year optimum and 5 year maximum data validity period.

Traffic data recorded by Mill Lane residents over two days in March 2018 showed approximately 126 two-way vehicle movements through the Lane between hours of 7am and 7pm with average of 7 articulated lorries per day, 14 rigid HGVs and 14 vans/smaller goods vehicles. Whilst the data is outside of the usual validity period, it does show a large percentage of goods vehicles using the road.

It has to be highlighted that Invictus Motors was not operational during any of the surveys; as such, the data used constitutes a best-case scenario for traffic flows along the road. A used car dealership would be expected to contribute significantly to traffic flows due to the nature of the operation. The vehicle deliveries will arrive on car transporters, the customers are likely to drive to the site, and take a test drive before purchasing, alongside staff movements which are also expected to be conducted via car. As such, the current traffic situation in the Mill Lane is largely underrepresented by the reports supporting the current planning applications.

Photographs 7 to 12, below, illustrate some examples of situations occurring on a daily basis along Mill Lane.



Photo 7 and 8 – Two vans and a single car transporter navigating the circa 3.5m pinch point along Mill Lane.



Photo 9 and 10 – Pedestrians in conflict with goods vehicles along the Mill Lane access.



Photo 11 and 12 - HGV movements along Mill Lane.

As can be seen from the above photographs, Mill Lane is blocked by vehicular traffic on a regular basis. Often these traffic conflicts result in residents having to stop on the A1060 and wait for space to be available within the Mill Lane bellmouth to undertake the turning manoeuvre. This is increasing the risk of rear shunts and collisions on the A1060.



Photo 13 – Ambulance parked outside Hatfield Haven care home, obstructing the access onto Mill Lane.

Further to the concerns raised above, it is understood that ambulances are frequently parked within the access to Mill Lane itself, where Hatfield Haven care home is situated. This significantly obstructs the

carriageway, and forces residents accessing the road to enter Mill Lane along the opposite side of the road, causing significant safety concerns for passing traffic and increasing the potential for traffic collisions. Photo 13, above, illustrates the extent of the issue.

Luckily, there are no accidents recorded within last 10 years on Mill Lane. However, it has to be considered that there is no official record of near-misses or private property damage due to vehicle manoeuvring.

Proposed Development

In regards to the proposed development, fundamentally the main concern is intensification of traffic. Any further developments along Mill Lane are likely to result in an intensification of traffic movements along this road, which will only serve to exacerbate the existing issues detailed above.

Proposed Mitigation Strategies

It is noted that application UTT/24/0103/PINS is supported by a drawing (reference ITB11347-GA-012, dated 19/10/2022) that shows a proposed widening scheme along the Mill Lane. While it is possible to improve the Mill Lane in second or third section (as divided above), due to the availability of public highway land and the applicants land, the same cannot be said for the first section of Mill Lane, where there is virtually no additional land available.

The proposed widening scheme appears to push the carriageway surface close to the care home building wall, where there are residents' bedrooms with windows opening outwards, which could create dangerous situations for road users, alongside care home residents, and raises the potential of further property damage. Any reduction of the existing verge would not be advisable in this area. In reality, these proposals are likely infeasible and would only further impinge upon residents' quality of life.

In addition, the visibility around the narrowest section of Mill Lane is very limited, and in connection with the limited width of the road, could lead to vehicles needing to reverse to allow for passing of vehicles heading in the opposite direction. The applicant shows the vehicle intervisibility around the corner in drawing ITB11347-GA-006 (dated 14/06/2016) at 25 metres between two passenger cars at the passing spaces, which is the correct stopping sight distance (SSD) for a 20mph road speed, in accordance with the Manual for Streets. However, what the drawing fails to reflect is that there are no warning signs or stopping lines provided to warn the drivers of the oncoming situation, which means that potentially both vehicles will be traveling their usual speed (about 15mph in accordance with the 85th percentile of the speed survey presented with the application), which reduces the intervisibility by half (12.5 metres).

The SSD for 15mph, in accordance with the MfS is 18 metres; in this respect, one can say that the vehicles most likely will not collide. However, taking into account the average reaction time of 1.5 seconds, the two vehicle are likely to pass the optimal passing space where the road is widest. This will result in at least one of those vehicles having to reverse. Further to this, it has to be considered that this example only applies to passenger vehicles; if van or larger goods vehicles need to access the road the situation will be even worse.

Taking into the account above information and analysis, it is believed that the proposed mitigation measures do not address sufficiently the existing or future road safety situation. The submitted Road Safety Audit, which was prepared for a previous application regarding the Prisoner of War Camp land, failed to even recognise Mill Lane's width as a potential issue. Therefore, it would be recommended for Essex County Council, in their capacity as Local Highway Authority, to review the RSA findings and brief to ensure that it has reviewed the entirety of Mill Lane and considered all the issues.

Summary

To summarise, the traffic generation related to the proposed developments, while not very significant, will add to the existing highway safety and inter-user conflict issues. The proposed mitigation strategy is insufficient to address existing situation, not even mentioning the future increase in traffic.

Policy Background

The proposed development is located on an existing road, which forms part of the public highway. However, the proposed development should be subject to local and regional planning policy and guidelines.

Essex Design Guide

The Essex Design Guide states that:

"Businesses likely to be regularly serviced by vehicles larger than 7.5 tonnes, such as retail stores or supermarkets, must be served on their delivery side by a road no smaller than type D, or else by a 6m-wide one-way loop road."

Vehicles larger than 7.5 tonnes are already using the road, which is well below the thresholds for a Type D 'Feeder Road'. On this basis alone, it is understood that the proposals are in contravention of the Essex Design Guide and are thus unsound in highways terms.

Further to this, it is also understood from the Essex Design Guide definitions of street types that Mill Lane would likely be classified as a Type G "Mews court" street, which would require a minimum width of 4.8m for a new development. Given that the road width upon the entrance to Mill Lane is only 4.27m, as per drawing ITB11347-GA-012, the proposed development also fails to meet the minimum requirements for a street of this type.

Essex Local Transport Plan

Within Essex's Local Transport Plan (LTP3), Policy 6 concerns freight movements, with a view to:

"...ensure that freight movement respects the needs of Essex's communities and does not impinge upon people's quality of life"

It is noted, above, that there have been many instances of goods vehicles causing damage to nearby properties. In this respect, it is clear that existing freight movements impinge upon local residents' quality of life, necessitating informal mitigation strategies to highway issues, as demonstrated in the photographs presented above.

Given that Mill Lane is already subject to significant congestion, as evidenced by the above photographic evidence, and on the understanding that this congestion gives rise to numerous traffic conflicts between goods vehicles, cars, and pedestrians, it is clear that any further permitted developments would only intensify these pre-existing issues.

Further to this, articulated and rigid HGV traffic dominates the road, creating an unappealing and unwelcoming sense of place along this traditionally residential road.

Uttlesford District Council Local Plan

Criterion A of Uttlesford District Council's Local Plan (2005) Policy GEN 1 states:

"Development will only be permitted if it meets all of the following criteria:

a) Access to the main road network must be capable of carrying the traffic generated by the development safely."

Here it is evident that the access onto the main road network is not capable of safely carrying traffic already along this road. Currently road users are already being placed in unsafe and uncomfortable

positions due to the presence of goods vehicles on the road, limited visibility and frequent need to reverse and manoeuvre vehicles on the road.

Criterion D of Policy GEN 1 states:

"Development will only be permitted if it meets all of the following criteria:

[...]

- d) The design of the site must not compromise road safety and must taken account of the needs of cyclists, pedestrians, public transport users, horse riders and people whose mobility is impaired."*

Road safety, especially for pedestrians and cyclists, is clearly compromised by these arrangements and as such it is clear that the current arrangement, not accounting for the proposed developments along Mill Lane, already poses a substantial safety risk in highways terms.

Summary & Conclusion

It has been demonstrated that Mill Lane is already a congested and potentially unsafe street environment, owed to existing HGV movements from Greenway Eggs, alongside development at the Invictus Motors site. The narrow rural nature of the road has led to property damage for residents and has generally affected their quality of life through increased traffic and noise.

These conditions put residents, especially when travelling on foot, at substantial risk of collision with goods vehicles and cars.

It has been established that Mill Lane is subject to a number of goods vehicle movements, and that the road is not suited to this kind of traffic movement. Further to this, the access arrangements at present are clearly in contravention of local, regional, and national transport policy.

Any further development is likely to intensify traffic movements beyond the level that Mill Lane can be able to withstand in a safe manner.

The trip generation and junction capacity modelling contained within the Transport Statement accompanying application UTT/24/0103/PINS do not present current assessment of the traffic conditions on the road, whilst the proposed mitigation measures along Mill Lane fail to address these key safety issues and are likely to result in further damage to properties along the route.

In light of the above, it is the opinion of EAS that the proposed developments pose substantial threats to highway safety along Mill Lane.

Paragraph 115 of the National Planning Policy Framework states:

"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."

As per the above excerpt, it is clear that the proposals would result in both an unacceptable impact on highway safety, and that the cumulative impacts of both permitted and unpermitted development on the road network would be very severe.

As such, we request that the proposals be considered with these concerns and the quoted local, regional, and national policies in mind.



I trust that the above is clear, but should you have any concerns or queries, please do not hesitate to contact me.

Yours sincerely,



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Transport Planner for and on behalf of EAS Transport Planning Ltd