

***CALLED IN PLANNING APPLICATION BY  
SAINSBURY SUPERMARKETS LTD***

**Proof of Evidence on behalf of  
Hertford Civic Society**

**Impact on sustainable transport  
and wider implications for Hertford**

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# 1 INTRODUCTION

## 1.1 Personal details

1.1.1 My name is Reg Harman and I appear at the Public Inquiry on behalf of Hertford Civic Society, by whom I have been commissioned to review the applicant's transport assessment and its implications for sustainable transport in and around Hertford.

## 1.2 1.2 Qualifications and experience

1.2.1 I hold an honours degree in French Studies from the University of Manchester (1966). I am a Fellow of the Chartered Institute of Logistics and Transport, a Fellow of the Institution of Highways & Transportation, a Fellow of the Royal Society of Arts and a Member of the Royal Town Planning Institute.

1.2.2 I am an independent consultant in transport policy & practice and a chartered town planner (and also a part time senior research fellow at the OMEGA Centre, Bartlett School of Planning, University College London). My previous employment included positions with the Chartered Institute of Transport, as Policies Director, 1995-2000; Hertfordshire County Council/SERPLAN; the University of East Anglia; the Sheffield/Rotherham Transport Study; and British Rail.

1.2.3 My experience has covered a wide range of areas, including strategic and project studies for railways and bus systems; local transport and accessibility planning; regional and local spatial plans; demographic forecasting; comparisons of other European countries' transport practices. Particular responsibilities have included: acting as expert witness on rail traffic and operations for Hertfordshire County Council at the West Coast Main Line TWA inquiry; managing SERPLAN's surface access studies for the Government's RUCATSE project; acting as expert witness for the Hertfordshire Society on the Baldock Northern Bypass inquiry; managing studies into transport impact and reviewing the implications for several development projects, especially hospitals; leading or contributing to strategic studies for railway development at national and regional level; advising Medway Council on the procurement of the Transport for Medway project and acting as its programme manager. I have acted as an adviser to the Hungarian government on transport policy and have served on the group of experts for two European Union projects.

# 2 SCOPE OF EVIDENCE

2.1.1 This proof of evidence reviews the transport implications of Sainsburys' proposal to develop the McMullen site as a supermarket (planning application 3/08/1528/FP). It concentrates on the effects on sustainable transport in the area and the wider implications for access and travel in the Hertford area by sustainable modes: walking, cycling and public transport. The evidence very briefly outlines the likely traffic effects. It then examines the implications of these for sustainable travel, looking in turn at the immediate impacts in the vicinity of the proposed development and at the potential wider effects across Hertford.

2.1.2 In contributing to Hertford Civic Society's objection to Sainsbury's planning application, I examined the traffic analyses and forecasts and set out a detailed critique. For this Inquiry the Civic Society is supporting the objections of Hertfordshire County Council as Highway Authority rather than duplicating their coverage of traffic forecasts. This evidence complements the Hertfordshire Highways case by reviewing the issues for sustainable transport modes. It particularly addresses the third reason recommended for refusal of the planning application in the report to East Herts Council's Planning Committee (14 January 2009):

"Inadequate provisions are made to mitigate the harmful impacts of the development or to promote walking, cycling and passenger transport options as part of the proposed development. The submitted Transport Assessment and draft Travel Plan has failed to adequately analyse the scope for encouraging these modes. The proposal is thereby contrary to national guidance in PPG13 and Policies SD1, TR1 and TR4 of the East Herts Local Plan Second Review April 2007 and the objectives of the Local Transport Plan."

2.1.3 The assessment of the transport implications were set out in the Transport Assessment (TA) submitted with the planning application. Some of the effects are also drawn out in the Environmental Statement for the application (ES).

2.1.4 The evidence is set out in six sections:

**Policies for sustainable transport.** A review of the sustainable transport policies set out in the policy documents relevant to the application;

**The traffic forecasts and potential levels of traffic.** A brief commentary on the traffic forecasts and their implications for future traffic on local roads;

**Walking.** Review of current patterns of walking in the vicinity, the treatment of walking in the TA and the implications;

**Cycling.** Review of current patterns of cycling in the vicinity, the treatment of cycling in the TA and the implications;

**Bus travel and provision.** Review of bus use and provision in the area adjacent to the proposed development site, the treatment of bus use and provision in the TA and the implications;

**Wider implications for sustainable travel in and around Hertford.**

Consideration of the implications for travel and access by sustainable means in and around Hertford.

2.1.5 From these successive analyses some conclusions are drawn, looking at the overall effect for Hertford.

### 3 POLICIES FOR SUSTAINABLE TRANSPORT

#### 3.1 National and regional policies

3.1.1 The principal thrust of Government policies in urban and regional planning is now aimed at achieving sustainable development, in the light of challenges raised by climate change and the imminent peaking of world oil supplies. Planning policies are very closely linked to policies for transport. Planning Policy Statement (PPS) 1 *Delivering Sustainable Development* states in paragraph 13 that:

“(ii) Regional planning bodies and local planning authorities should ensure that development plans contribute to global sustainability ... through policies which reduce energy use, reduce emissions (for example, by encouraging patterns of development which reduce the need to travel by private car ...)  
...”

“(v) Development plans should also contain clear, comprehensive and inclusive access policies – in terms of both location and external physical access. Such policies should consider people’s diverse needs and aim to break down unnecessary barriers and exclusions in a manner that benefits the entire community.”

3.1.2 PPS1 defines the principles more fully in paragraph 27 as:

“In preparing development plans, planning authorities should seek to:”

“(v) Provide improved access for all to jobs, health, education, shops, leisure and community facilities, open space, sport and recreation, by ensuring that new development is located where everyone can access services or facilities on foot, bicycle or public transport rather than having to rely on access by car ...”

“(vi) Focus developments that attract a large number of people, especially retail, leisure and office development, in existing centres to promote their vitality and viability, social inclusion and more sustainable patterns of development.”

“(vii) Reduce the need to travel and encourage accessible public transport provision to secure more sustainable patterns of transport development. Planning should actively manage patterns of urban growth to make the fullest use of public transport and focus development in existing centres and near to major public transport interchanges.”

3.1.3 Government’s key goals for transport policy, set out in *Developing a Sustainable Transport System*, are for the transport system to:

“support national economic competitiveness and growth, by delivering reliable and efficient transport networks;  
reduce transport’s emissions of carbon dioxide and other greenhouse gases, with the desired outcome of tackling climate change;  
contribute to better safety, security and health and longer life expectancy by reducing the risk of death, injury or illness arising from transport, and by promoting travel modes that are beneficial to health;  
promote greater equality of opportunity for all citizens, with the desired outcome of achieving a fairer society; and  
improve quality of life for transport users and non-transport users, and to promote a healthy natural environment.”

3.1.4 The current *Guidance on Local Transport Plans* defines the links between planning and transport action as (paragraph 25) as:

“It is critical that transport and spatial planning are closely integrated. Both need to be considered from the outset in decisions on the location of key destinations such as housing, hospitals, schools, leisure facilities and businesses, to help reduce the need to travel and to bring environmental, health and other benefits. It will be essential for LTPs to reflect and support Local Development Frameworks - LTPs should be a key consideration in the planning process.”

## 3.2 Hertfordshire and East Herts policies

3.2.1 The current transport policies for the area are set out in the *Local Transport Plan 2006/07 – 2010/11* published by Hertfordshire County Council, as the local transport authority. The LTP sets out in section 5 a Vision and nine Transport Objectives for the future of transport over the next twenty years, as a basis for its programmes. The vision is defined as:

“to provide a safe, efficient and affordable transport system that allows access for all to everyday facilities. Everyone will have the opportunity and information to choose the most appropriate form of transport and time of travel. By making best use of the existing network we will work towards a transport system that balances economic prosperity with personal health and environmental well being.”

3.2.2 The nine objectives focus on safety, congestion, accessibility, air quality and quality of life. The three objectives under the last two categories include:

“To mitigate the effect of the transport system on the built and natural environment and on personal health.”

“To raise awareness and encourage use of more sustainable modes of transport through effective promotion, publicity, information and education.”

“To reduce the need for the movement of people and goods through integrated land use planning, the promotion of sustainable distribution and the use of telecommunications.”

3.2.3 The sub section on objectives concludes that

“To ensure that the County Council’s vision becomes a reality over the next 20 years, delivery of the Local Transport Plan objectives are essential to bring about the changes required to achieve this vision.”

3.2.4 East Herts Council’s adopted *Local Plan* includes policies on quality of life and on transport. Under quality of life and reducing social exclusion it states that (paragraph 1.17.5):

“East Herts Council is committed to a policy of equality of opportunity in both employment and service provision. ... Planning can play a small, but none the less important, part in reducing inequalities, for example:

- accessibility for all sectors of the community ... to places of work, education, health care and other essential services;
- support of passenger transport choices so that everyone is able to travel ...”

3.2.5 Under its policies on sustainable development, the *Local Plan* includes transport and traffic, on which it sets out its approach as:

“Transport and traffic are widely regarded as key issues to tackle in order to progress to a more sustainable lifestyle. The links with other areas of policy, both within and beyond planning, are wide and complex.

Two issues are identified to be tackled:

- Reduce the need to travel
- If there is a need to travel, travel the shortest distance possible by the most efficient means possible.”

3.2.6 Policy STC1 of the *Local Plan* states [in part] that:

“The preferred location for new retail development and proposals for other key town centre uses, will be town centres followed by edge-of-centre sites in line with the sequential approach. Such development will be permitted where all the following criteria are met:

- (a) the proposed development is consistent with the character and role of the town centre;
- (b) the proposed development would be accessible by a choice of transport means other than the private car;
- (c) where appropriate the proposed development will provide for the effective use of upper floors; and
- (d) parking provision, access, and traffic generation are satisfactory, in accordance with Council's adopted standards."

3.2.7 Chapter 5 of the *Local Plan* sets out the policies on transport. Policy TR1 "Traffic Reduction in New Developments" states that:

"Developments generating additional traffic will be required to incorporate measures, commensurate with the scale of additional traffic generated, to ensure that alternative transport options to the private motor vehicle are available to the users of the site. Such measures may include:

- (a) the extension and improvement of pedestrian links;
- (b) cycle paths and facilities;
- (c) improvements to the passenger transport network ..."

3.2.8 On support for cycling and provision of cycling facilities, the *Local Plan* states that (paragraphs 5.12.1 / 2):

"The potential benefits of cycling over motorised transport, not only pertain to the cyclists themselves in terms of health and financial cost, but also to other people and the environment in general. This is because this form of travel is non-polluting, quiet, convivial, poses minimal danger to others, and thereby helps contribute towards a reduction in total vehicle emissions. Cycles also take up less road and destination space than cars. Consequently ... the deficiency in safe cycle route provision need[s] addressing. ... Where routes are shared with motorised vehicles, traffic may require slowing and restraining. ..."

3.2.9 Policy TR9 "Cycling – Cycle Routes" states that:

"(I) The provision of a large-scale, coherent, attractive, comfortable, safe, direct, useable and clearly signposted network of continuous cycle routes and traffic calmed areas (with surfaces that are well maintained and both suitable for cyclists and appropriate for the character of the local environment), throughout the District for commuting and leisure purposes will be strongly supported. Where possible these routes should link urban areas and, in particular, should be aimed at providing safer routes to schools, town and local centres, stations, employment areas, health centres and recreational facilities. Where feasible, priority should be given to cyclists ..."

3.2.10 Policy TR10 "Cycling – Protection of Cycle Routes" states that:

"... In order to maintain permeability for cyclists, the District Council will also seek to protect informal cycling routes."

3.2.11 On public (passenger) transport the *Local Plan* states that (paragraphs 5.15.1/3/5):

"... Passenger transport can be significantly more energy efficient than car travel and result in less congestion and potentially lower polluting emissions, especially when passenger transport vehicles are well occupied. Greater use of passenger transport would aid traffic reduction and help the quality of the environment."

“A network of bus routes that cover both urban and rural locations also serves the District and the Council supports the expansion of these services and improvement of their associated facilities. “

“However, despite the existing level of provision, the District Council considers that only if both the perceived and actual level of services, including frequency, reliability, cost and comfort are improved (as detailed above) will a substantial modal shift from private motorised transport to passenger transport.”

3.2.12 On pedestrian environments the *Local Plan* states that (paragraphs 5.16.1/2):

“Walking is a healthy activity without the serious consequences for the environment associated with motorised transport. For some people, walking is the only means of transport. However, pedestrians (which throughout this plan include disabled people and those with prams/pushchairs) can feel ignored in the transport debate and development in the past has often tended to impede, rather than promote, the facilitation of walking and easy access for modes other than the car. In our towns, road conditions and vehicle emissions can make journeys by foot, wheelchair or pram/pushchair, an inconvenient and potentially dangerous form of travel. It is not only the fact that roads can be dangerous, but also the perception of danger, that can dissuade people from choosing a more environmentally friendly way to travel.”

“If walking is to become a more attractive option and account for a greater modal share, action must be taken to give pedestrians (including disabled people and those with prams/pushchairs) safe and convenient conditions that will make them feel comfortable in their surroundings and engender change. ...”

### **3.3 Guidance on sustainable transport in planning applications**

3.3.1 More specific policy on addressing sustainable transport as part of planning management is set out in Planning Policy Guidance Note (PPG) 13 *Transport*. This addresses two aspects: the location of development; and the provision of sustainable transport for it.

3.3.2 With regard to location, paragraph 19 states that:

“A key planning objective is to ensure that jobs, shopping, leisure facilities and services are accessible by public transport, walking, and cycling. This is important for all, but especially for those who do not have regular use of a car, and to promote social inclusion. In preparing their development plans, local authorities should give particular emphasis to accessibility in identifying the preferred areas and sites where such land uses should be located, to ensure they will offer realistic, safe and easy access by a range of transport modes, and not exclusively by car.”

3.3.3 Paragraphs 23 and 26 set out principles for provision of sustainable transport modes:

“For major proposals, the assessment should illustrate accessibility to the site by all modes and the likely modal split of journeys to and from the site. It should also give details of proposed measures to improve access by public transport, walking and cycling, to reduce the need for parking associated with the proposal and to mitigate transport impacts.”

“Development comprising jobs, shopping, leisure and services should offer a realistic choice of access by public transport, walking, and cycling. This should be assessed in terms of how easy it is to get to the site comparing

the different modes (taking into account journey times, public transport frequency, quality, safety, and access for disabled people).”

- 3.3.4 The *Guidance on Transport Assessment* sets out the recommended methodology for Transport Assessments. These include coverage of all modes on an equal basis, addressing them together in trip generation, serious evaluation of alternative scenarios incorporating the various modes and reiteration of analyses and forecasts to establish the best approach.
- 3.3.5 The TA and related documents for the proposed development fail to do this, since their focus is primarily on car access, with analyses and forecasts limited to those for car travel. Access to the site by foot, cycle and bus are treated for the most part in a descriptive and limited fashion and little consideration is given to any impact on these modes outside the immediate vicinity of the development site.

## **4 THE TRAFFIC FORECASTS AND POTENTIAL LEVELS OF TRAFFIC**

### **4.1 The approach to traffic forecasts**

- 4.1.1 Transport aspects of the application are dealt with mainly in the Transport Assessment (TA). Patterns of origin of shoppers are drawn from the Retail Statement (RS) and some of the implications are considered in the Environmental Statement (ES).
- 4.1.2 The TA includes a brief section on modal split (4.48-4.50). But this only reviews the typical proportions of travel by different modes found elsewhere, from the TRICS database. It does not forecast the total person trips likely to be generated by the proposed store and then use these figures to assess the proportions and numbers likely to travel by each mode. In consequence it does not illustrate the potential use of different modes. For non-car trips it only provides descriptions of the current bus services (2.6-2.13), rail services (2.14-2.16), and pedestrian and cycle networks (2.17-2.20), as well as the road network in the immediate area (2.21-2.36).
- 4.1.3 Car use is covered very differently. In section 2 the TA sets out the conditions of road movement, with information on traffic flows and a table of observed delays. The analyses and forecasts carried out in the TA are entirely of car movements. They start (5.1) with a reference to covering “all trip modes”. But by 5.6 this has slipped into developing figures for car trips only. The apparent expectation stated in the outline Travel Plan (TA Appendix F) is that “Clearly the majority of customer trips associated with a supermarket will require their car.” This assumption confirms that sustainable travel modes - walking, cycling and public transport - have not been seen as a serious travel choice for the proposed store. Yet the Retail Statement (RS) identified by survey that about one-half of all current trips to the town centre are made by walking, cycling and bus (3.14).
- 4.1.4 The traffic forecasts involve calculation of vehicle trip levels and patterns and their application to three road junctions in the area: Hartham Lane / Cowbridge, the sole vehicular entry / exit point; Old Cross, just round the corner from this; and the North Street / Cross Lane junction at the other end of St Andrews street. Different models have been applied to each one. No analysis or forecasts have

been prepared for other road junctions: notably Parliament Square, one of the main entries to the town centre itself, and The Wash, which lies just across Mill Bridge from Old Cross; these and could be affected by traffic congestion caused by delays at Old Cross. Some revisions to the traffic forecasts have been prepared (August 2009) for the Inquiry

- 4.1.5 The analyses and forecasts also include trips by employees and visitors at the listed building intended for community / commercial purposes (ex McMullens). These form a very small part of the total.

## 4.2 Brief review of traffic forecasts

- 4.2.1 As indicated above, this evidence does not aim to consider in detail the traffic forecasts set out in the TA and the August 2009 revisions. It simply aims to set out those key aspects of traffic forecasts which are relevant to the treatment of and implications for sustainable modes of transport.

- 4.2.2 From the TA and revisions the following main features regarding traffic emerge:

Most shoppers at the proposed store are assumed to come from Hertford and its adjacent villages (catchment area 5 in the RA and TS). Relatively few shoppers would come from the surrounding main towns (which already have larger retail provision than Hertford). This suggests the main impact of the proposed store would be on the behaviour of shoppers in and around Hertford itself; a point borne out by the findings of Sainsbury's' own surveys (RS 3.5 and 3.14).

The main impact of traffic growth from the proposed development falls on Cowbridge and Hartham Lane. Traffic would be higher than without the proposed development, especially during off-peak hours. Hourly flows along Cowbridge would be around 10% higher. Traffic on Hartham Lane, and consequently turning movements off/on Cowbridge, would be far higher: nearly doubled for the morning peak, tripled for the evening peak, nearly quadrupled for the weekday off-peak. Existing congestion in the peak periods would be worsened. (TA paragraphs 5.35-5.39, 5.48-5.51, Appendix C and revisions)

The junction at Old Cross is already close to capacity during the weekday peaks and also for the Saturday peak hour. Right turns into Cowbridge are particularly close to capacity but other movements show high occupation of capacity too. The proposed development would lead to demand exceeding capacity for all peak periods on several of the flows through Old Cross, resulting in potentially long queues forming. (TA paragraphs 5.52-5.55, Tables 5.11/5.12)

The swept paths for heavy goods vehicles to and from the proposed development through Old Cross, Cowbridge and Hartham Lane show that the largest articulated and rigid vehicles would occupy both sides of Cowbridge for part of their movement, blocking other traffic going in both directions, and could impinge on the pavements.

- 4.2.3 The TA makes few suggestions for mitigating traffic impacts, except to propose doubling the exit lane from Hartham Lane, through narrowing the lane widths, and providing a 'keep clear' marking on the road. In discussion of the issues it plays down the likely impacts, suggesting that behaviour patterns would mean that traffic would possibly not be seriously affected. This optimistic view should not be accepted unless established by proper testing.

## 5 WALKING

### 5.1 Current provision and patterns of walking in the area

#### 5.1.1 Statistics on walking in Hertford indicate the following:

Access to the town centre shops – Surveys of 1984 and 1994 showed that about two-fifths of all shoppers reached the town centre by foot. The appellant's own RS showed that one third of town centre shoppers arrive by foot (3.14).

Access to employment – in the 2001 Census about one in ten employed people walked to work. The major part of travel to work was by car but train accounted for a similar level to walking. Since train travellers and many car users would have been going some distance, the implication is that a significant proportion of local work access is on foot.

#### 5.1.2 Local information and observation suggest that walking is particularly significant for:

Access to local shops, which is typically mostly on foot.

Travel to junior school, despite the growth of car transport by parents who have chosen a more distant school.

Local leisure and social visits.

#### 5.1.3 A lot of the trips on foot into the town centre and going across the town pass along the main pedestrian arteries. In the vicinity of the proposed development, these include the pavements along Cowbridge itself and St Andrews Street.

#### 5.1.4 For some parts of Bengeo it is possible to reach the town centre by crossing Hartham Common and going through The Folly. However, for the great majority of people in Bengeo, including Lower Bengeo and Port Vale, the only realistic route is along Cowbridge. This is an unsatisfactory route for walking, as the pavements are in places narrow or obstructed, the surfacing is not good, and there are a number of minor roads and accesses to buildings. Between Hartham Lane and Old Cross the buildings come right up to the pavement line. Pedestrians are close to moving vehicles throughout. At peak times there is congestion, bringing vehicle noise and fumes. At some slack times vehicles tend to move at the maximum permitted speed.

#### 5.1.5 St Andrews Street is effectively the sole pedestrian route in from North Road, Hertingfordbury Road and beyond, and thus carries substantial pedestrian traffic. It has particularly narrow pavements on the section along the shops to Old Cross. There are a number of obstructions from lamp posts and traffic signs along the road.

#### 5.1.6 Pedestrians can also encounter serious problems trying to cross either Cowbridge or St Andrews Street because of the continual movement of traffic. The crossing at Old Cross is constrained by the limited time allowed by the light phasing. There can also be problems with cyclists using the pavements and with retailers' boards placed on the pavements, both of which are quite common.

## **5.2 The treatment of walking in the TA and its implications**

- 5.2.1 The TA contains a discussion of possible provision for pedestrian access to the proposed store (4.9-4.18). While this provides useful consideration of what might be provided immediately adjacent to the store, little real attention is given to providing for walking further afield, whether for trips to the store or otherwise. There are no analyses or forecasts for such trips. The only result indicated is that “increased pedestrian and cycle activity implies an increased risk of accidents” (TA paragraph 5.75). No specific figures are provided for this nor are any means of mitigation mentioned.
- 5.2.2 Yet the increases in traffic along Cowbridge forecast for the proposed development are bound to considerably worsen the already poor conditions for those on foot. Pedestrians would experience increased noise, poor air quality and general disturbance along Cowbridge. As traffic would be higher during the daytime off-peak compared to the non-development case, this experience would extend throughout the day rather than just occur in the peak hours. There would be particular problems in crossing Hartham Lane, as the proposed development would involve far higher levels of traffic turning in and out all day. The delays to pedestrians from this have nowhere been assessed.
- 5.2.3 In addition crossing Cowbridge itself would become more potentially hazardous. The potential may not be reflected in figures because people may choose not to cross in the way that they currently do, but this would reduce the flexibility of pedestrian movement. Recent research (from the University of the West of England) has shown that heavy traffic along a road divides communities and worsens the quality of life. The perception of danger can have a negative impact on lifestyles, especially for more dependent groups.
- 5.2.4 Movement of large goods vehicles in and out of Hartham Lane would also be potentially hazardous and definitely a perceived threat to people on foot.
- 5.2.5 The same problems would affect pedestrian movement along St Andrews Street, especially as the pavements are already very narrow.
- 5.2.6 Crossing the junction at Old Cross has been a difficult matter for pedestrians for many years. Cowbridge is wide at this point and the traffic lights restrict crossing opportunities, causing delays. Since the forecasts indicate increased congestion at this point, these problems are likely to worsen further.

## **6 CYCLING**

### **6.1 Current provision and patterns of cycling in the area**

- 6.1.1 Available statistics indicate that levels of cycling in the area are currently very low. Cyclists appear to account for about 3% of trips to the town centre and 3% of all trips to work in Hertford. Cycling also accounts for a small proportion of leisure trips.
- 6.1.2 These low levels reflect the serious barriers to cycling which have been identified by Government and other studies. Nonetheless cycling is potentially very important, as a non polluting and healthy way of getting around over moderate distances. Government’s determination to enable cycling to achieve its potential

is indicated by the three year budget of £140 million now approved for the programmes of Cycling England.

- 6.1.3 Those trips made on bicycle for access to the town centre and across it pass along the main local arteries. In the vicinity of the proposed development, these include Cowbridge itself and St Andrews Street.
- 6.1.4 As for movement on foot, it is possible to reach the town centre from some parts of Bengoe by crossing Hartham Common and going through The Folly. However, for the great majority of people in Bengoe, including Lower Bengoe and Port Vale, the only realistic route is along Cowbridge. This is an unsatisfactory route for cycling, in view of parked cars, moving traffic, and the junctions with minor roads and accesses to buildings. Between Hartham Lane and Old Cross the road is relatively narrow. At peak times there is congestion, bringing vehicle noise and fumes. At some slack times vehicles tend to move at the maximum permitted speed. There are no cycle lanes.
- 6.1.5 St Andrews Street is effectively the sole cycle route in from North Road, Hertingfordbury Road and beyond. It is busy and often congested. Because it is relatively narrow near Old Cross, it is often not possible for cyclists to pass inside cars stopped for the traffic lights. There are no cycle lanes.

## **6.2 The treatment of cycling in the TA and its implications**

- 6.2.1 The TA contains a discussion of possible provision for cycling to the proposed store (4.25-4.32). While this provides useful consideration of what might be done to improve direct cycle paths around the store and along Hartham, relatively little attention is given to providing for cycling further afield, whether for journeys to the store or elsewhere. There are no analyses or forecasts. The only result indicated is that “increased pedestrian and cycle activity implies an increased risk of accidents” (TA paragraph 5.75). No specific figures are provided for this.
- 6.2.2 While Sainsburys offer to fund connections to Sustrans route 61, there is no discussion of mitigation for cycling generally across the surrounding area. As with walking, the forecast increases in traffic along Cowbridge are bound to worsen the already poor conditions for those on bicycle. Cyclists would experience increased noise, poor air quality and general disturbance along Cowbridge. This experience would extend throughout the day, especially as turning movements in and out of Hartham Lane would be most significantly increased during the off-peak hours. The problems for cyclists from this have not been assessed.
- 6.2.3 Movement of large goods vehicles in and out of Hartham Lane would also be potentially hazardous and definitely a perceived threat to cyclists, both at the Hartham Lane junction and round the bend along the narrow section to Old Cross.
- 6.2.4 The same problems would affect bicycle movement along St Andrews Street, especially as the road is relatively narrow near Old Cross.

## **7 BUS TRAVEL AND PROVISION**

### **7.1 Current patterns of bus use and provision in the area**

- 7.1.1 Available statistics indicate that bus travel accounts for about one in ten of all trips to the town centre, for shopping and personal business. For travel to work the bus accounts for around one in twenty trips. It is also important for college and secondary school travel.
- 7.1.2 Use of local buses is mostly confined to people without a car. These include the elderly, teenagers and children, and other people from poorer households. The elderly and some of the other groups hold concessionary passes for free travel.
- 7.1.3 There is one bus route along Cowbridge, route 333 serving both sides of Bengoe and terminating in the town centre. This runs between early morning and late afternoon Monday to Saturday, every half hour. It suffers from traffic congestion at peak hours. There are stops near Port Vale but not close to Hartham Lane; they are about 300 metres from the proposed development site. The route also serves stops on The Wash.
- 7.1.4 St Andrews Street carries a number of all day routes: 395/396 serving North Road and Sele Farm; 641 to Hatfield; 390 to Stevenage. Only the first is high frequency, four buses per hour. There are also a number of routes with very occasional journeys. Bus operation is largely confined to daytime hours Monday – Saturday; there are hardly any buses evenings and Sundays. The congestion, especially towards Old Cross at peak hours means queues that delay buses, giving longer journeys for passengers and less efficient operation of buses. Because traffic problems can be varied, it is not possible normally to plan for them in route scheduling. In consequence, congestion points such as Old Cross bring unreliability to the routes passing through it. There are stops by St Andrews church, about 400 metres from the development site. Routes also serve stops on The Wash; also about 400 metres from the site.
- 7.1.5 Most buses now used are low floor ones. These are easier for boarding by the less mobile, who make up a good proportion of users. However, the stops along Cowbridge and St Andrews Street suffer from illegal and inconsiderate parking, so that buses often cannot pull in. The alighting stop in The Wash particularly suffers from this. In consequence bus users are often forced to alight and board from the street surface rather than from the pavement.
- 7.1.6 All stops in the immediate area consist of a sign and a timetable board on a bus stop pole or a lamp post. Intending passengers stand on the pavement, which is also used by other pedestrians. They do not have a clear space or, except outbound on The Wash, any shelter. Access to the stops depends almost entirely on walking along local pavements and footways, which are generally in poor condition (as indicated in sub section 5.1 above).

### **7.2 The treatment of bus services in the TA and its implications**

- 7.2.1 The TA sets out current service bus provision in a descriptive way (2.6-2.13). It makes some general observations about improving terminals and information in the town but otherwise offers no real suggestions for enhancing bus access to the proposed store. It implies that people might either use stops on Cowbridge or The Wash or travel to the bus station and walk across the proposed footbridge.

- 7.2.2 These stops are variously situated 300 or 400 metres from the proposed store. While this is the accepted catchment for bus stops, it does represent the outer limit. Most of the services are low frequency and thus judging return time would be difficult, indicating some need to wait. The return walk to the bus would involve carrying large amounts of goods; not an attractive option. Even for those with no other means to reach the store, it is generally unpleasant. In practice it is highly unlikely that many people would choose to do this. The TA offers no analyses or forecasts for possible bus use.
- 7.2.3 As for walking and cycling, bus provision and use are likely to be affected by the extra traffic along Cowbridge forecast to result from the proposed development and by the consequently increased delays at Old Cross. This would reduce efficiency. Increased unreliability in operation of services would reduce their attractiveness. Walking to most of the bus stops involves using Hartham Lane and Cowbridge, including the narrow section of Cowbridge round to Old Cross for stops on The Wash. These are likely (for reasons set out in sub section 5.2) to be even more unpleasant to walk along. In consequence the proposed store would have a negative impact on bus service provision and use.

## **8 WIDER IMPLICATIONS FOR SUSTAINABLE TRAVEL**

### **8.1 Wider implications**

- 8.1.1 Hertford town centre has seen a significant changes of facilities and of character in recent years, reflecting changes in people's shopping patterns and the provision of shops and similar facilities. There has been a large and continuing growth in the number of bars, pubs and cafes, so that the town is a major attraction for mostly younger people seeking a lively nightlife. Banks and other service providers have also increased in number. Experience elsewhere in England suggests that this probably reflects the decline in more conventional small retail providers. The town centre has stayed alive as a retail centre for two main reasons: the continuing survival of Waitrose, providing both a general food service and some high quality food sales elements, supported by other strong units such as Boots; and the range of very specialist shops, some long surviving, others tending to come and go in the light of fashion and economic trends. But this vitality and viability are by no means secure.
- 8.1.2 The general approach of local interests in Hertford has been to focus on car-borne access as the main source of town centre business. This is in fact misguided: for example, town centre surveys in 1984, 1994 and 2007 (the latter as part of the applicant's RS) that as many people came in by foot as by car. Buses play a significant role too. But increased car parking provision and free movement of traffic are seen as key factors in the town's prosperity (although these are not well managed: parking provision is of poor quality, road access to car parks is difficult, and charging systems and on-street parking controls have a poor image). Furthermore Hertford remains dominated by traffic movement in the centre, so that it is not attractive overall; a particular weakness in an era when optional shopping is becoming more of a leisure pursuit. Winding around parked cars, even on supposedly pedestrian streets, and having to cross fast moving traffic between two apparently adjacent shops does not encourage people to stay and buy more. The footpaths in and into the town are mostly of very poor quality. The local bus service is fragmented and utilitarian

- 8.1.3 Retail provision has its best effect when it is concentrated, so that people making a shopping trip can combine various purchases in one spot, together with other activities, such as using banks and post offices, visiting professional services (e.g. estate agents) or enjoying leisure facilities (cafes and restaurants, theatres). This is particularly important for city and town centres, including smaller towns like Hertford.
- 8.1.4 The revised Sainsbury's proposal, if it were approved, is likely to exacerbate the decline in Hertford's retail activity. For one thing, the levels of traffic increase forecast in the TA would worsen conditions around Cowbridge, St Andrew Street and Old Cross for people on foot, as would any redesign of local highways to improve traffic flows. A lot of people walk through this area to and from the town, with no real alternative route, and conditions for pedestrians are already poor. In a few cases this might, ironically, cause people to start using a car. In most cases the people affected would not have a car available; they are likely to reduce the trips they make on foot, or, where that is unavoidable (walking to work or school, for example), suffer more. Thus easy access on foot, which ought to be a guiding principle for a small historic town like Hertford, would become worse.
- 8.1.5 Old Cross and St Andrews Street also form a key route for local bus services, which carry a reasonable proportion of people to and from the town centre. More traffic also means less reliable bus operation, bringing a poorer service to those reliant on it, and worsening the economics for bus operators. If more shopping provision moves off-centre (e.g. if Sainsburys were to divert more trade from Waitrose and the town centre than forecast), this could further weaken the economics of providing existing bus services, perhaps leading to reduced services being provided. This could seriously weaken the opportunity many people currently have of reaching the town centre's range of shops and services, especially if they live at any distance.

## **9 CONCLUSIONS**

### **9.1 Conclusions**

- 9.1.1 Current Government and local policies are strongly geared to sustainable development. The promotion of sustainable transport modes – walking, cycling, public transport – forms a key element of this. This national policy direction is repeated in the relevant policy documents of Hertfordshire County Council, as the local transport authority, and East Herts Council, as the local planning authority. Policy guidance and recommended practices also indicate the priority that should be given in development planning to ensuring that sustainable transport modes play an enhanced role.
- 9.1.2 Yet the Transport Assessment and related documents for the proposed development fail to do this. The focus is almost entirely on access by car and the analyses and forecasts carried out are limited to those for car travel. Access to the site by foot, cycle and bus is treated in a superficially descriptive and limited fashion and little consideration is given to any impact on them outside the immediate vicinity of the development site.
- 9.1.3 The proposed supermarket would not only increase traffic in the immediate locality. It is likely to have a negative impact on walking, cycling and bus travel through the adjacent area to the town centre and beyond. This would reduce the

opportunities for getting about by these modes. This would further weaken the town centre and continue changes in the character of the town. The impact of the Sainsbury's proposal would fall primarily on those living in the areas most immediately affected, especially around Hartham. But it would also particularly affect the more disadvantaged groups in the town, such as old people, some categories of younger people, and poorer households.

- 9.1.4 In land use terms, Hertford has suffered from a tendency to move development outwards while leaving poorly used areas closer in. There has been no attempt to provide the necessary high quality local infrastructure, notably good footway routes, or to consider more effective use of road space, perhaps with priorities for buses, taxis and local commercial traffic. Putting a supermarket with a large car parking area in the Hartham area would further serve to weaken economic activity in the town centre and move development out of Hertford, leading to more pressure to build housing on greenfield areas, and more dependence on car movement.
- 9.1.5 In consequence, the transport focus and impact of the proposed development, as identified in the Transport Assessment accompanying the planning application, fails to provide for sustainable transport access to the proposed superstore. Furthermore, it worsens the conditions for provision and use of sustainable modes in the immediate vicinity. Thus it produces effects contradictory to national policy. It also contradicts local policy on priority for sustainable transport in development, as indicated by the third recommendation of the report to East Herts Council Planning Committee on the application for the proposed development.