

## North Herts District Council

### Local Plan

#### MM069

#### Statement by J Rigg (16632)

From the attached documents the following is apparent:

1. HH have approved a Signalised Junction at GR / NR junction.
2. In approving the above, HH's decision was predicated on the Developer's Transport Assessment (TA).
3. HH were not able to review the Model used to generate the developers' TA. *(Appendix 2 Herts Highways COMET Output Report, page 5)*
4. The developer's TA indicates the signalised junction will operate at capacity AM and just within capacity PM in 2031 at 84.5% (criteria being 85%) *(Appendix 2 Herts Highways COMET Output Report, page 5)*
5. The developer's model was based on "known, committed development in the area" plus background growth at the time the assessment was undertaken in 2017. *(Appendix 3 point 1, 1<sup>st</sup> para)*
6. As noted in the response to the Freedom of Information Request "the developer's own modelling work did not take full account of all the proposed development across the wider area (other than committed sites)." *(Appendix 3 point 3, 2<sup>nd</sup> para)*
7. The wider area detailed above would seem to include Graveley. HH in the conclusion to their response to the HO3 Planning Application *(Appendix 1, page 2)* stated  
  
***"The modelling work did not look at the impact on Graveley and no mitigation measures have been identified here but would be addressed when the North Herts District Council area is developed. "(my emphasis).***
8. HH are currently updating its COMET model to include planned housing and employment sites across the County as well as Local Plan allocations. Once this is done it will allow HH to identify the cumulative impact of growth in the area and the impact of individual sites.
9. HH have chosen to place its reliance on the developer's TA rather than its own COMET model which assesses inter-urban traffic flows. Why? Inter-urban flows remain the primary constituent of the traffic flows through the junction.
10. Highways's COMET model which assesses inter-urban traffic flows predicts a Volume Over Capacity (VOC) of 95% for North Road. This means the link will experience a high level of stress in the future year of 2036 in the PM Peak. Figure 2 predicts VOC's of 91% and 101% on the Graveley Road north and south arms. *(Appendix 2, page 4).*

This in keeping with the summary results table detailed in Matter 6 Appendix 3, which is an extract from the AECOM Report, Stevenage Town Centre Model, **(Stevenage Local Plan, ED109)**.

11. As stated in the Traffic Note from PTB Transport Planning Ltd unless adequate mitigation to address traffic volumes through Graveley are undertaken, proposed development under the Stevenage and NHDC plans will result in Severe Congestion through Graveley contrary to NPPF 32 2012. **(ED38, PTB Traffic Impact Assessment, Point 1.8.6, page 11)**

J Rigg

Attachments:

Appendix 1: The Conclusion to Herts Highways (HH) Consultation response to the North of Stevenage HO3 Planning Application, which was subsequently passed on 6<sup>th</sup> February 2020.

Appendix 2: Herts Highways COMET Output Report, dated 14/1/20 for the Graveley Road / North Road Junction (GR / NR).

Appendix 3: Herts County Council's response to a Freedom of Information Request regarding Herts Highways decision to approve the installation of Signalised Traffic Lights at the North Road / Graveley Road (NR / GR) junction.