

Statement of Case

From

Greenbelt
(Rule 6 Party)



In the appeal: APP/B1930/W/24/3343986

Planning Application Reference: 22/0267

Land between caravan site and Watling Street, Park
Street, St Albans, AL2 2PZ

Contents

- 1 Background
- 2 Green Belt
- 3 Highways
- 4 Housing Need and “Affordable” Housing
- 5 Sustainability
- 6 Other Considerations
- 7 Appeals
- 8 Balancing Exercise

- Appendix A The open farmland
- Appendix B Arup’s buffer methodology
- Appendix C Nicholsons’ letter 8/8/23
- Appendix D Traffic along Watling Street
- Appendix E Active travel and public transport
- Appendix F Station access
- Appendix G The station access points
- Appendix H The farmland/Previous appeal
- Appendix I The “wildlife reserve”

1 Background

1.1 The application is to build 95 houses on 4.3 hectares of Metropolitan Green Belt on the edge of the village of Park Street, St Albans.

1.2 The planning application 22/0267 was submitted in February 2022, and two amendments were made to it that warranted additional consultation periods. It eventually went before the Planning Committee at St Albans District Council (SADC) on 14 August 2023, with a recommendation from officers to pass it. Councillors were minded to refuse it, however decided to defer a decision pending reports on Green Belt and Traffic matters from external consultants, in order to provide confidence that they would win any potential future appeal. It returned to committee on 15 January 2024, again with a recommendation from officers to pass it, where it was refused.

1.3 No previous application has been submitted for this site and the only similar one on adjacent land was in 2014 which was rejected and dismissed at appeal see 7.1

1.4 The application constitutes inappropriate development in the Green Belt and should be refused unless it can be proven that benefits clearly outweigh the harm to the Green Belt.

2 Green Belt

2.1 Paragraph 143 of the NPPF (12/23) states the five purposes of the Green Belt. Purpose b is “*to prevent neighbouring towns merging into one another*”. Park Street is a second tier settlement and this purpose would be significantly breached as the rural separation of Park Street and St Albans would be all but eliminated west of Watling Street, causing coalescence. There would be continuous urbanisation from the Park Street roundabout to Park Street.



2.2 Purpose c is “to assist in safeguarding the countryside from encroachment”. The replacement of a completely open, unspoilt agricultural field with no built form on it, with 95 houses, associated garages, hard standing and roadways would significantly breach this purpose.

2.3 Paragraph 142 of the NPPF (12/23) specifies:

“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.

This land is 100% spatially open at the moment and its visual openness is very obvious when viewed from the east and south, with the topography providing outstanding rural views across it (Appendix A). This is particularly so as drivers, cyclists and pedestrians leave St Albans heading south to Park Street and from houses located east of the site.

2.4 The applicant will point to the Arup Green Belt Review, in which Arup suggested considering it for release from the Green Belt, and as a consequence it was included in the Regulation 18 process of the Draft Local Plan.

2.4.1 The Arup Green Belt review has not been subject to any scrutiny since its publication. Its contents were essentially “lifted” wholesale into the draft Local Plan with no opportunity for appraisal of the review findings by the Planning Policy and Climate Change Committee, who’s function it was to assess the contents.

2.4.2 There are notable deficiencies in certain aspects of Arup’s approach, including in relation to the land in question:

- i) The way that they have applied the “buffer” concept in section 4.2.2 of their “Final Report” as illustrated in figure 4.3, breaches their own methodology (Appendix B).
- ii) There is no substantive basis for deciding that the buffers should be as small as 250/400m.
- iii) Arup breached the buffer distances that they had defined.
- iv) Park Street is separated from St Albans, which is tier one town, so when applying their buffers, Arup should have applied their 400m buffer.
- v) They have under-estimated the value that the land makes to avoiding coalescence of communities.
- vi) Despite these deficiencies, Arup still stated that the land “*performs strongly against NPPF purposes*” and “*strongly*” in relation to purpose c of the Green Belt; “*assisting in safeguarding the countryside from encroachment*”.

2.4.3 The land’s inclusion in the Regulation 18 process is due to the lack of scrutiny of the Arup report. During the Regulation 18 process there were more responses highlighting issues with the inclusion of this piece of land in the draft Local Plan, than any other piece in



the Plan. The Regulation 18 process only attracted 955 responses for the entire plan, but 11.4% of these responses objected to this land's inclusion, citing a number of reasons. Should the land be included in the Regulation 19 process, it would be against a back-drop of ignoring the public's input, which is likely to cause issues at Examination. The particularly small response of 955 from an adult population of approximately 115,000 is likely to indicate other issues with the consultation process which no doubt will also be considered closely at Examination. The inclusion of a site in a draft Local Plan would normally be given very limited, or no weight, and the suspect circumstances surrounding this Draft Plan illustrates why this is.

2.4.4 The Arup Green Belt Review in 2023 is the first review to suggest the release of this land from the Green Belt. There were two other substantive reviews in the previous 10 years; SKM in 2013 in preparation of the then emerging Local Plan and AECOM in 2017 in support of the then evolving Neighbourhood Plan. Both reviews assessed this land parcel, in addition to others throughout the area, suggesting other areas for release from the Green Belt, but concluded that this land, along with the adjacent farmland served important Green Belt purposes. AECOM stated:

“Development would affect land that is presently rural rather than urban in nature, would cause demonstrable harm to the character and amenity of surrounding areas, would result in encroachment into open countryside and would be visually intrusive from the surrounding countryside. Development would also result in coalescence between Park Street and How Wood and significant encroachment between Park Street and Chiswell Green and Park Street and St Albans.”

2.5 The applicant commissioned Nicholsons to produce a report to address Green Belt issues raised. This was published in August 2023 and is entitled “Nicholson Lockhart Garratt Green Belt Review August 2023” within the applicant's evidence base. Much of the content of this report is erroneous and distorts the facts pertaining to the land in question.

2.5.1 They describe the treeline to the west of the land as “a strong defensible boundary”. This is not correct. Even Arup stated that if the development proceeded, “The new boundaries would require strengthening”, since they are merely a thin tree line (Appendices C1 & C2). It is suggested that this would adequately replace Watling Street, which has defined the limit of the settlement for the past 2,000 years.

2.5.2 The letter made erroneous claims regarding buffers, which are covered in 2.4.2 above, and will be addressed in detail at the inquiry.

2.5.3 Arup awarded the land 5 out of 5 for Openness, which few objective observers would disagree with. Nicholsons chose to distort its qualities, by presenting pictures that show houses in the distance, rather than outstanding views in the other directions. Nevertheless these distant houses are not adjoining the land, they are separated by the strong defensible boundary of the Ancient Watling Street, which cannot be seen from the photo. To the south there is a “wildlife reserve” between Old Orchard and the land in question, so their statement that there are “residential dwellings along southern boundary” is not accurate. Importantly, there is also no access from Old Orchard to the proposed development (Appendix C3).



2.5.4 They state that *“Its settlement edge location creates a transitional suburban character.”* This is not correct. The land is 100% agricultural, with no built form or urban characteristics at all, is completely unspoilt and resembles any field that could be found in the middle of the countryside (Appendix C4).

2.5.5 In their attempt to suggest that the land should not score 5 out of 5 for openness, they draw comparisons with the adjacent, larger parcel SA-107, which Arup rated at 3 out of 5 for this purpose. There is a distinct difference between the two; SA-107 is substantially screened by trees and high hedgerows along the majority of its perimeter so cannot be seen from most directions, whereas this parcel is highly visible.

2.5.6 In a further attempt to justify their argument, Nicholson draws comparison between the land in question and SA-113, which is to the south of Frogmore, and then states that because SA-113 scores 2 out of 3 for openness, SA-108 should as well. This argument is quite bizarre since it has none of the characteristics of the land in question. SA-113 comprises a large church, car park, cemetery and a minimal amount of grassland, all of which is visually obscured from the road. This is in complete contrast to SA-108, which incorporates no building of any form, is 100% agricultural and has a wide expanse of views from most directions (Appendices C4 & C5).

3 Highways

3.1 The stretch of Watling Street from the Park Street roundabout suffers from chronic queuing at peak times. These queues are regularly 400-600m (Appendices D1 – D4).

3.1.1 The applicant presented traffic data from a survey undertaken in November 2021, which was during a COVID “stay at home” advice period. This data bears no relation to actual traffic volumes.

3.1.2 The applicant submitted projections for after the development were built, derived from ARCADY software, which are false. They admit that these are erroneous *“modelling results show mean queues of 3 PCUs on the Watling Street approach when in reality the queuing on that arm can reach between 20 to 30 vehicles.”*

3.1.3 The applicant states that the junction “operates well within capacity” at peak times, at the same time as admitting that there are 115m queues from the roundabout. These statements are contradictory. The statement is made on the basis of the number of vehicles accessing the new junction and overlooks the main issue of queuing traffic, which is actually 400-600m at peak times. This traffic would block the proposed new junction and would make access to the site very difficult and potentially dangerous.

3.1.4 Over 300 comments were made to SADC regarding traffic issues, along with photographic evidence of queuing traffic and unsafe highways. None of this was passed onto Highways to evaluate, prior to them providing an opinion of the suitability of the development. This was despite this flaw in the process being brought to their attention at the highest level. Officers then accepted Highways’ response, disregarding the evidence presented to them directly through the consultation.



3.2 No assessment has been undertaken on the access point of the site and hence on safety concerns for residents entering and leaving it and other road users. The applicant will point to their “Stage 1 Road Safety Audit October 2023”, however this does not address the dangers associated with vehicles turning in and out of the site. That Audit only considered whether vehicles could make the turn into the site and concluded that a large vehicle (10 x 2.55m) “*can just make the right turn out of the access, without colliding with the existing central island*”, it then proceeds to state that a larger vehicle eg removal van, probably could not. This conclusion was arrived at in good conditions with no traffic pressure, rather than under “real life” conditions. Highways insist on a refuse vehicle of the dimension 10.875 x 2.49m being able to access sites, however a vehicle of only 9.93 x 2.49m was tracked for the site access drawing.

3.3 Pedestrian access to the site would be dangerous. In order to reach the safe pavement on the eastern side of Watling Street most pedestrians would either have to cross the busy road away from a pedestrian crossing, or access one of the two nearby pedestrian crossings via a narrow track outside the site. This track is highly dangerous, with vehicles travelling within one metre of any pedestrians at 40mph, including articulated vehicles (Appendices D5 & D6).

3.4 The incremental impact of the increased queuing at the roundabout has not been considered in relation to the safety of vehicles entering and leaving the BP garage (Appendix D3), the Travellers site, or entering or leaving the various driveways, on the eastern side of Watling Street, many of which suffer from gradient difficulties.

3.5 The excessive traffic already renders the prospect of cycling along Watling Street, highly dangerous. An increase in traffic would therefore conflict with the Council’s Active Travel policy, of encouraging more cycling.

3.6 The impact of the Strategic Rail Freight Terminal (SRFT) has not been properly considered on Watling Street and hence on the access point for the site. It is anticipated that the SRFT will generate an additional 10,000 – 15,000 vehicle movements per day, and no traffic survey has been undertaken to determine where these vehicles will go. It is entirely un-realistic to state that the traffic along Watling Street will reduce once the SRFT is built, simply because of the creation of a one lane road around the perimeter of the SRFT and downgrading the status of Watling Street.

3.7 The level of pollution at the access point to the site (AL2 2NN) is already extremely high, being at 80 percentile, which is within the top 20 most polluted addresses in the UK. Data provided by Imperial College, London gives the following levels for this location; PM2.5: 11.49mcg/m3 (The WHO limit is 5mcg/m3)*; PM10: 18.10mcg/m3 (The limit is 15mcg/m3)+; NO2: 23.46mcg/m3 (The limit is 10mcg/m3)#.

3.7.1 The Clean Air (Human Rights) Bill, known as Ella’s Law, would establish a right to clean air and compel local authorities to bring air quality up to minimum WHO standards within five years. Whilst this bill was not enacted in the last parliament and requires inclusion within the government timetable, the pressure to act exists, which will have a direct effect on Local Authorities, who will be compelled to take action.



3.7.2 Irrespective of the status of Ella's Law, the action of Local Authorities allowing housing developments to be built in the highest polluted areas of their districts, would signal a disregard to their obligations and could give rise to liability issues in the light of Ella Kissi-Debrah's death. The High Court ruling against the Greater London Authority and Transport for London, and subsequent Coroner's report set a precedent.

3.7.3 The Coroner's Prevention of Future Death's Report stated; "*In my opinion there is a risk that future deaths could occur unless action is taken*". One suspects that the action he was suggesting to be taken wasn't along the lines of building housing developments alongside existing queuing traffic, in locations which already generate the highest pollution levels in the country.

*: 19.9% of strokes were attributed to exposure for a year or more, of PM2.5 concentrations exceeding 10mcg/m³

+: Cardiovascular mortality increases by 0.76% and respiratory mortality by 0.58% for every 10mcg/m³ increase of PM10

#: Exposure (for a year or more) to 30mcg leads to a 5.5% increased risk of disease related mortality

4 Housing Need and "Affordable" Housing

4.1 There is an unmet housing need in St Albans, in particular in the provision of homes for low income families. There is also a shortfall in meeting housing targets dictated by Central Government and calculated using the "Standard Method. It is argued that this development will help address these issues. However, there are deficiencies in this argument.

4.2 The plot size of the properties, at 22 units per hectare, Green Belt setting and the adjacent open countryside, would create a premium on the price of the properties to rent or buy. This premium would be in excess of 20%, eliminating the effect of the discount applied to "affordable" housing. Thus most of the "affordable" houses would be more expensive than equivalent houses in standard residential streets in the area.

4.3 Ten of the 38 "affordable" properties would need to be allocated under the First Homes Scheme, however there is no indication that any of the remainder would be Social Rent units, therefore they would merely benefit from the neutralised 20% discount mentioned above.

4.4 From the appellant's indicative housing split (Maddox Planning Statement 6.35 – table 5), the "affordable" units in the development would be smaller properties. When assessed in terms of the number of bedrooms, the market value units have on average 3.0 bedrooms and the "affordable" have 2.16. On this basis, the "affordable" proportion of the site drops from 40% to 32.4%, and assuming that the First Homes would be the one bedroom flats, this would represent only 4.0% of the site by bedrooms.

4.5 The market houses, as with the "affordable" units, would attract a premium price due to the factors described in 4.2. Such developments would often attract buyers from more expensive areas in North London seeking to re-locate to a more pleasant environment in the commuter belt, with good schools. Such buyers sell their smaller house/flat, purchasing a larger property, for less money and then bank the difference in price. The creation of these premium houses would therefore "import" buyers from other areas, rather than meet any local need.



5 Sustainability

5.1 It has been stated by the applicant that the site is situated in a sustainable location. Whilst it is not in a completely rural environment, there are significant issues regarding sustainability.

5.2 The bus service from near the site is poor, with two unreliable services that only operate during the day, and then only on an hourly basis. The frequency and service times breach the County's "Place & Movement Planning and Design Guide for Hertfordshire" (P&M) (adopted 18 March 2024). Chapter 5, Transport Assessment, 7.8, states: "A minimum service provision level of 4 buses per hour peak / 2 buses per hour off peak (06:30 to 22:00) is considered as appropriate" (Appendix E3).

5.3 The train service from Park Street Station operates once every 45-60 minutes along a single track line between St Albans Abbey and Watford. This service is notoriously poor with very frequent cancellations. In order to access the station from where most of the houses would be located within the site, would entail a walk of 780m, in order to avoid crossing Watling Street on a blind bend opposite the station (Appendix F & G). This distance breaches Hertfordshire County Council's suggested maximum distance of 400m ((P&M), echoed in the CIHT Planning and Walking (2015)). When the station is accessed from the northern part of the site, it would also entail an extended walk, but also either crossing the busy road away from a pedestrian crossing or negotiating the dangerous narrow track detailed in 3.3.

5.4 The only shop close by the site is within the BP garage at the north end. Apart from this, the next is 900m away in Park Street, where there is a convenience store, takeaway and a gun shop. Access to these would again entail the walk described in 3.3 for most residents.

5.5 Most Park Street residents use the small parade of shops at How Wood, for their everyday needs, however this would entail a car journey from this site, since the site would be more remote than the rest of Park Street.

5.6 The nearest junior school is also a considerable distance away at 1.25km, too far for young children to walk, and again would often entail the dangerous access described in 3.3.

5.7 There is no capacity at the local Midway doctors' surgery, existing residents have immense difficulty in making an appointment. Surgeries attempt to not close their lists to residents, meaning that the lack of capacity feeds through to a further decline in service when significant new developments are occupied.

5.8 The applicant has attempted to portray the location as one which would encourage cycling, but the reality is somewhat different. For cyclists to access any facilities in St Albans, it would entail a journey that few existing nearby residents make, and this site would be located a further 500m away. The journey to the City Centre would be 2.4km, ascending two steep hills. It would also entail negotiating a disgusting dark and dingy tunnel, which is not perceived to be safe by most residents (Appendices E1 & E2).

5.8 The proposed Toucan Crossing would only be of use, to those wishing to access the tunnel or the BP garage shop from the northern part of the site. Using it to access any facilities in Park Street, would add a considerable distance to any journey.



6 Other Considerations

6.1 The land has been farmed continuously for decades, usually providing a crop of wheat or rapeseed (Appendix H). A consultant on behalf of the applicant determined that 85% was 3b, with the 15% balance 3a. Whilst the classification of Best and Most Versatile (BMV) land only extends to 3a, the reality is that there is minimal difference between 3a and 3b. The fact that there may be more stones in one or the other makes no difference to the production of grass crops.

6.2 The land in question is bounded to the south and west by rich wildlife habitats, with a “wildlife reserve” having been created to the south. Amongst the vast array of wildlife are deer, foxes, badgers, hedgehogs, slow worms and lizards. Pheasants and other large birds are present, including kestrel, red kite, buzzard and raven. Additionally, smaller birds are prevalent including mistle thrush, fieldfare, starling, house sparrow and greenfinch (red listed) and dunnock, grey wagtail, song thrush and sparrowhawk (amber listed). Bats can also be seen regularly flying over the land (Appendix I).

6.2.1 Should the development proceed, the “wildlife reserve” would struggle to survive, since it would be a narrow strip of land sandwiched between two housing developments.

6.2.2 Video evidence has proved the existence of badgers on the “wildlife reserve” adjacent to the application land to the south, and since the width of the reserve is 24m, any sett is within the 30m of the proposed site. The first survey that was undertaken by the applicant was deficient and claimed that there was no badger activity south or west of the site. After video evidence of activity from the reserve was produced, there was a second attempted survey. However, this was very restricted due to two metre high brambles, dense scrub and stinging nettles, resulting in the comment; “*certainty of a sett within the Survey Site cannot be ascertained*” (NLGs Survey 22-1047, 2/9/22). During a less overgrown time of year, mammal holes have been identified on the reserve (Appendix I1 – I3).

7 Appeals

7.1 The only application for houses on or adjacent to the site, was in 2014 where an application to build 10 dwellings on the 0.45 hectare land immediately to the south of the appellants land, was refused at application stage and appeal. The Inspector stated that it would represent encroachment into the countryside and would significantly reduce the openness, and harm the character of the Green Belt (Appendix H2).

7.2 The appeal at Roundhouse Farm, Bullens Green Lane in June 2021 has been referenced by many appellants, because it was allowed against a backdrop of inadequate land supply in St Albans. However, in the subsequent three years, there have been a significant number of other appeals that were refused, including Tollgate Road, Colney Heath, a mere 250m from the Roundhouse Farm site, 150% larger and determined only this January, so 2 ½ years more recent.

7.3 In the 13 months from 1/5/23 to 31/5/24, there were 24 appeals (ignoring linked cases) determined by Inquiry in England, that related to building residential dwellings on the Green Belt. Two of these were in St Albans and nine were in adjoining districts to St Albans. Out of the twenty four appeals, only seven were allowed, the other seventeen were dismissed.



7.4 Amongst the seven allowed appeals were some with particular characteristics relating to the specifics of the development under appeal. An example of this is the allowed appeal at Bottisham, which centred on a specialist retirement care village, rather than housing.

7.5 Whilst most were not in our district, many were close, or adjacent to it. The issues around land supply and outdated Local Plan were also prevalent with most of these.

7.6 Despite the housing supply issues, the inspectors repeatedly stated that no Very Special Circumstances existed and further went on to say that decisions on the release of Green Belt land should be made through the Local Plan process.

7.7 With a number of the appeals, Green Belt issues were the only main factors causing their refusal.

7.8 The two linked appeals in Chiswell Green, St Albans are the most local to this appeal, and one of the most recent. This decision appeared to hinge on one site being regarded as an in-fill, whilst the other was unusually offering 100% “affordable” housing. The appeal decision for these sites is currently being challenged by a campaign group representing the local community, through a Judicial Review.

8 Balancing Exercise

8.1 The housing land supply in SADC is below the minimum required of 4 years, there is also a shortage of social housing. The evolving Local Plan is intended to address these issues.

8.2 In the absence of an up to date Local Plan and a housing shortfall, speculators are maximising their opportunity to make windfall profits from obtaining planning permission on Green Belt land around the District. The appeal site is one such example.

8.3 Allowing such appeals in an ad hoc fashion is causing the District’s structure to fragment. The cumulative effect of allowing developments, especially in the south of the district, is placing considerable pressure on resources that are already beyond breaking point. The road network in this area, even prior to the Freight Terminal’s operation, is well over its capacity.

8.4 The traffic data presented by the appellant is spurious, having been obtained during a COVID “Stay at Home” period, and the appellant themselves agree that projections produced by the Arcady software are false.

8.5 The land in question is an extremely important piece of Green Belt. It is the only significant area separating Park Street from St Albans along the line of Watling Street, thus avoiding coalescence.

8.6 The land is very much open, both visually and spatially, and is perhaps one of the most attractive and important land parcels in this part of the District.

8.7 The proposed site has no attachment to any existing residential development, and would require most new residents to exit the site in a dangerous fashion, in order to reach any



other residential area, public transport or shops. Due to this and the long distance to most facilities, the private car would be used more by the new residents, than by other residents within mainstream Park Street.

8.8 The site is not in a sustainable location with no, or very limited, access to schools and shops, inadequate bus services and the poor train service being a considerable distance away.

8.9 There would be an adverse effect on the wildlife, on, above and adjacent to the site, in particular in the “wildlife reserve” to the south. The two inadequate badger surveys have been unable to confirm that there are no setts within 30m of the site. Video evidence suggests that there are.

8.10 The development would result in the loss of class 3 agricultural land. This has been continually farmed for decades with various grass crops such as wheat and rapeseed.

8.11 Due to the premium location, the “affordable” houses with a 20% discount would be no less expensive than equivalent properties located in standard residential settings in the same area. Therefore the only benefit from the “affordable” allocation, could be the 10 First Homes Scheme properties, required under the revised NPPF (Para 6), since no Social Rent units have at this stage been proposed. The real benefit of the scheme in meeting true housing need in the district would therefore be very limited.

8.12 The majority of the units would attract a premium price due to the plot sizes and their setting, this would be likely to attract purchasers from more expensive areas outside the District, therefore do little to address local housing need.

8.13 There is considerable opposition to the proposal in the local community, with many residents regarding this farmland to be the defining land, both physically and psychologically, in the retention of Park Street as a separate community. The Parish Council opposes it, as do the two active District Councillors.



Appendix A – The open farmland

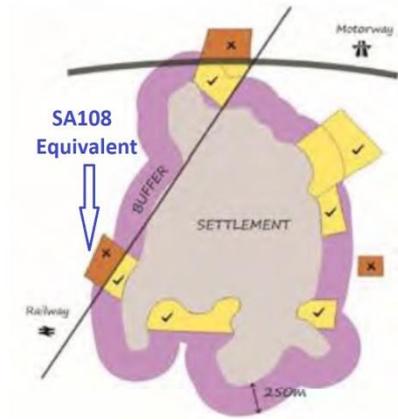
The farmland is completely open with no built form (A1 & A2).



Appendix B – Arup’s buffer methodology

B2 - Applying Arup’s methodology, the land should not be considered for release

Figure 4.3 Application of a Settlement Buffer



The area marked on ARUPs example, is equivalent to the position of SA108 within the buffer around Park Street. Based on their own example and methodology, they should not have assessed it for release from the Green Belt buffer.

B3 – If the plan is “flipped” it is a near identical positioning of this sub-area



If ARUPs diagram is "flipped", and the railway line replaced with Watling Street, the plan replicates the precise positioning of SA108. This illustrates very clearly, the misapplication of their own methodology.

B3 - If the land was released, this 165 metres would be the entire buffer between Park Street and St Albans



Appendix C Nicholsons' Letter 8/8/23

C1 – This thin treeline is proposed to be a new “Strong defensible boundary” – C2



C3 – The Green Belt “Wildlife Reserve” to the south ensures that there are no “settlement edge dwellings along the southern boundary”, as claimed by Nicholsons.

C4 – This openness of the landscape is being compared by Nicholsons, with the cemetery and church below (C5).



Appendix D Traffic along Watling Street to the Park Street Roundabout

D1 – The developer claims that there are a maximum of 15 second queues leading to the Park Street roundabout



D2 – The roundabout has been described as working “well within capacity”



D3 – Exiting the garage and other driveways can be difficult and dangerous at peak times



D4 – To navigate the queue and roundabout can take considerable time



D5 – A narrow track close to traffic, would need to be used to reach a pedestrian crossing



D6 – The narrow track around the outside of the site is very close to 40mph traffic



Appendix E Active Travel and Public Transport

E1 – It is suggested that new residents will use this tunnel, before they walk/cycle the 2 miles, up two hills to the City Centre.



E2 – Few of the existing local residents use this tunnel, especially after dark, considering it unsafe.



E3 – The public transport schedule is infrequent and un-reliable

<u>Method of Transport</u>	<u>Peak Frequency</u> <u>7.00am – 9am</u>	<u>Off Peak</u> <u>Frequency</u>	<u>Saturdays/ Sundays</u>
Bus – 601 Borehamwood – Welwyn Garden City	Two services at 07.17& 08.17	Approx. hourly to 20.20	Hourly service 07.54 to 19.08 on Saturdays. No Sunday service
Bus – 601 Welwyn Garden City - Borehamwood	Two services at 07.57 & 08.50	One bus approx. hourly to 20.03	Hourly service 07.50 to 18.50 on Saturdays. No Sunday service
Bus – 635 Watford - Hitchin	Two services at 07.15 & 08.30	One bus just over every hour to 20.30	No service at weekends
Bus – 635 Hitchin - Watford	One service at 07.38	am: One bus every 2 hours pm: One bus approx. hourly to 19.27	No service at weekends
Train (Abbey Flyer) – St Albans to Watford	Every 45 in peak times	Every 60 mins 06.12 to 23.11	Hourly on Saturdays to 23.11. Hourly on Sundays to 23.17
Train (Abbey Flyer) – Watford to St Albans	Every 45 in peak times	Every 60 mins 06.45 to 22.59	Hourly on Saturdays to 22.59. Hourly on Sundays to 23.29

Appendix F Station access

F1 - The actual distances to the station are considerably more than that quoted by the applicant and exceed the maximum recommended by the Council

Distances to the station

<u>Starting Point</u> (Distances in metres)	<u>Crossing Point A</u> <u>Pedestrian</u> <u>Crossing (safe)</u>	<u>Crossing Point B</u> <u>Direct</u> <u>(dangerous)</u>	<u>Crossing Point C</u> <u>Hawfield Gardens</u> <u>(dangerous)</u>
Furthest House	890	615	760
Closest House	610	335	480
Mid development	780	505	650
Edge of development	550	275	420

F2 – There is an average distance of 230m to access the nearest exit point to the site (blue line), then a further distance (red line) to reach the station via one of the three crossing points, making total distances of:

A – Pedestrian Crossing 780m, B – Direct 505m, C – Hawfield Gardens 650m



Appendix G The station access points



G1 - Safe pedestrian crossing point A



G2 - Stairs to the direct crossing point B



G3 - Looking South - Stepping out from the station – G4 - Looking North
The most direct crossing point B (Unsafe)



G5 - Walking out on a blind corner



G6 - A busy road with a junction

Hawfield Gardens Crossing point C (unsafe)

Appendix H The farmland/Previous Appeal

H1 – The land has been farmed for decades to grow various grass crops, most notably wheat, barley and rapeseed



H2 - The land in the foreground is the site where the 2015 appeal was rejected. Beyond, where rapeseed is being grown, is the current application site.



Appendix I The “Wildlife Reserve”, adjoining and immediately to the south of the site

A1 – During the summer months it is not possible to access most of the reserve due to its overgrown nature, so no mammal holes could be seen during the survey – A2



I3 – There are numerous examples of badger activity on the reserve, from videos



I4 – Bats flying over the application site and “wildlife reserve” are common



I5 – Hedgehogs, as well as deer and foxes can often be seen



I6 – Various reptiles including lizards and slow worms are present

