

Proof of Evidence
Sustainability Issues

From

Greenbelt (Rule 6 Party)
Presented by Terrie Smith



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

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Personal Profile

My name is Terrie (Theresa) Smith and have been a resident of Park Street village for over 42 years and have watched this village grow and change, most rapidly over the last 10 years. My children were born here, attended nursery and schools here and moved away to areas where they could afford to live. When my son married his wife who is an Intensive Care Registrar, they could afford to move back and both work in London travelling by car and train.

I have been an active member of the community; I am a Director of Save St Albans; Fight the Freight and stood as Litigant in Person against HCC and SEGRO in the High Court. I have held many senior management roles, invented ApplePay, to which I hold the patent, and ended my career as a CEO of a company that I took from bootstrap to valuation circa £100m.

Until retirement last year I mainly worked in London travelling by train from Radlett (or sometimes St Albans during school holidays when the journey may be less than 30 minutes).

I was elected in May 2024 as a St Albans District Councillor.

The evidence which I have prepared and provide for this appeal reference APP/B1930/W/24/3343986 in this proof of evidence, is true and I confirm that the opinions expressed are my true personal opinions.



Summary

- The proposed site is not in a sustainable location due to limited access to local amenities, public transport and safe walking or cycling.
- The only shop close to the proposed site is within the petrol filling station at the north end of the proposed site, which is expensive and has a very limited range of goods.
- Analysis of journeys to key facilities required for everyday living shows that a car would be essential for new residents, as is the case for existing Park Street residents.
- The site is not within reasonable walking distance of schools for younger children and is more remote from the limited shops at How Wood than most locations in Park Street. Residents of the proposed developments would therefore be expected to be even more dependent on their car than existing Park Street residents.
- The train service from Park Street station, the nearest train station, is notoriously unreliable making it an undesirable option for important options like travelling to work or school.
- Park Street station is a 780 metre walk from the middle of the proposed development. The train terminates at stations in St Albans and Watford which are a further 700 metres or more walk from each town's shopping centre.
- Nearby bus services are infrequent and breach Hertfordshire's "Place & Movement Planning and Design Guide for Hertfordshire" (adopted 18 March 2024).
- HCC Highways officials have described similar or better public transport services in Appeal 3338501 and planning application 5/2023/2191, respectively, as "*By comparison of current bus provision serving the site to the prescribed P&M standard, the current level of provision is not adequate to be classified as high quality*" (Para 44)" and "*The site is located where journeys to and from the proposed dwelling are likely to be predominantly car based. Accordingly, the location of the proposed development would fail to meet the objectives of Policies 1 and 5 of the Hertfordshire Local Transport Plan (LTP4) in respect of encouraging movement by sustainable transport modes and reducing travel demand*".
- Doctors surgeries and chemists are a considerable distance away, requiring car transportation
- There is insufficient infrastructure at Midway doctor's surgery to cope with a large increase in patients. Several large developments have already been given approval in Chiswell Green, which themselves will add over 2,500 prospective patients to Midway's list.

1. Sustainability

1.1 The proposed site is not in a sustainable location. In making this statement, we need to look in detail at the characteristics of a sustainable location as relevant in 2024. We cannot simply state that because there are houses nearby and those residents are getting by, therefore this must be a sustainable location.



1.2 Nearby houses might have been built some considerable time ago, when little or no consideration was given to modern sustainability.

1.3 A sustainable location today, would be regarded as one where car journeys are not necessary for everyday living. There would be opportunities to access such facilities using public transport, walking or cycling and that these options being realistically available and safe. These facilities can be summarised as follows:

- a) Places of employment
- b) Schools for all ages of children
- c) Shops offering a wide range of goods
- d) Medical facilities
- e) Pharmacy
- f) Sports and leisure facilities
- h) Community spaces

1.4 Public transport options from close to the site, are sparse and are as detailed in Appendix A.

2. Train Service

2.1 Park Street station is the only station within reasonable proximity of the proposed development. However, it has the dubious record of being the least used railway station in Hertfordshire. The reason for this is the very limited service that it offers and its poor record of reliability, with frequent cancellations- a locally well known fact

2.2 The line is not commercially viable and is run by the Community Rail Partnership and supported financially by the Department for Transport.

2.3 The station is one of the stops on the “Abbey Line”, which is a single track running from St Albans Abbey station and Watford Junction. Due to the nature of the single track, without passing points, services are restricted to once per 45 minutes or once per hour, depending on time of day. The frequency is particularly a problem when returning from wherever the resident has been, since it can easily entail up to an hour wait to return home.

2.4 In December 2022 the Office for Rail and Road identified Park Street station as the least used in Hertfordshire:

“The least-used stations are predictably all on the Abbey Line, which is the local line that runs between Watford Junction and St Albans Abbey.



The quietest stop of all is Park Street where just under 10,000 entries and exits were recorded in 2021/22. This is the lowest of any station in Hertfordshire – and down from around 21,000 in 2019/20”.

2.5 The station became famous in 2016, when it featured in a TV series entitled the “Least Used Stations”. The programme can be remembered from the fact that when the presenter boarded the train at Watford, an announcement was made that the train was cancelled. The conductor stated *“It sounds like you travel on this train a lot gentlemen, you must know (that it is often cancelled)”*. They eventually used a replacement mini bus service to reach Park Street station, since there weren’t enough passengers to warrant a bus service. On arriving at Park Street, their first observation was that the only method of payment, the one ticket machine, was out of service. Whilst waiting for the return service, they discovered that too was cancelled (since only one train operates on the line). The presenter stated; *“What they do is they make out like it’s going to run, and then when it gets closer to the time, it becomes cancelled, so the 12.06 has been cancelled”*.

2.6 Distorting the facts might promote this as an effective means of regular travel, but with an average usage of only 26 passengers per day in 2021/2, the truth is somewhat different. Locals cannot rely on it, least of all for important travel arrangements such as travelling to work and we usually drive to either St Albans City or Radlett stations and catch the direct service to St Pancras. This of course necessitates two car journeys per day through Watling Street.

2.7 The most northerly station on the line is St Albans Abbey, which is south of, and outside the centre of St Albans. From this station, it is necessary to walk 750m up a steep hill (Holywell Hill), to arrive at the traffic light on the southern edge of the City.

2.8 The most southerly station is Watford Junction, which can give access to Euston, by changing trains. The edge of the shopping centre lies 700m from the station.

2.9 In order to access the station from where most of the houses would be located within the site, would entail a walk of 780m (Appendix B1 & B2), in order to avoid crossing Watling Street on a blind bend opposite the station (Appendix C3 & C4). This distance breaches Hertfordshire County Council’s suggested maximum distance of 400m, as specified in the County’s Place & Movement Planning and Design Guide for Hertfordshire (adopted 18 March 2024) **(CD14.6)** . When the station is accessed from the northern part of the site it would not only entail an extended walk, but also crossing the busy road away from a pedestrian crossing or negotiating the dangerous narrow track shown in Appendix D.

2.10 The options for accessing the station are:

2.10.1 Crossing the main road directly opposite the station, which entails walking down a steep, narrow overgrown staircase (Appendix C2), then judging when you have



sufficient time to reach the other side in between the busy traffic. The return walk from the station requires crossing the busy road, with a partial blind bend to the south (Appendix C3). This is not a safe crossing point.

2.10.2 Crossing the main road at Hawfield Gardens (Appendix C5 & C6). This can be achieved by nimble people willing to take a risk with the busy traffic. The return from the station is pretty precarious however, with a severe blind bend to the north.

2.10.3 Crossing at the pedestrian crossing just south of the railway bridge (Appendix C1). This is a safe crossing point.

3. Bus Service

3.1 The bus services detailed are infrequent, so tend to be used on a more ad hoc basis by existing residents, if at all. There is no reason to believe that the occupiers of the new homes would act in any other way to those of the existing nearby homes. To suggest otherwise misrepresents the likely situation.

3.2 The frequency of the bus services breaches Hertfordshire's "Place & Movement Planning and Design Guide for Hertfordshire" (adopted 18 March 2024). Chapter 5, Transport Assessment (**CD14.8**), 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 A demonstrates that this level of service is not currently available, and no plans have been advanced to meet this minimum standard. The peak service is less than half that stipulated and the off peak service finishes considerably before 22.00. Only one bus runs on a Saturday and none at all on Sundays. (**CD11.17 & 11.18**)

3.3 Chris Carr from Highways reported on the public transport situation in his letter of 3/2/23 on page 7 (**CD9.17**), stating:

"The nearest bus stops to the site are located on Watling Street, along the frontage of the site. These stops provide hourly services between Welwyn Garden City, Borehamwood, Hatfield and Watford.

The nearest train station to the site is Park Street Railway Station, approximately 450m to the south of the site. This station provides frequent services between St Albans and Watford Junction.

It is concluded that the site is in a sustainable location with access to a number of sustainable travel modes and this is acceptable".



None of these statements is the complete truth as the bus service falls well short of the minimum standard stipulated by Highways and the one track train line only provides a sporadic service as detailed above.

The same person, when commenting at the Bricket Wood appeal (3338501) (CD11.15), which has a near identical bus and train service, in fact one of the buses and the train are the same, said in his proof of evidence:

“P&M Part 1 Chapter 8: Transport Assessment identifies under Paragraph 7.8 on how public transport provision should be assessed when the LHA is reviewing development proposals “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 (Para 43)

“By comparison of current bus provision serving the site to the prescribed P&M standard, the current level of provision is not adequate to be classified as high quality” (Para 44)

This is inconsistent with the opinion that he has offered in relation to the two schemes.

Highways also reported on application 5/2023/2191, which came before the planning committee on 5/8/24, where it was deferred. The location of this development had easy access to bus routes; with four different buses (301, 361, 724 & 725) serving this site 7 days a week, 3 on an hourly basis and one on a half hourly basis, which is considerably more buses running on a more frequent basis, than those servicing the appeal site. However, their comment on the sustainability aspect of the scheme in their letter of 19/1/24 (CD11.16) was:

“The site is located where journeys to and from the proposed dwelling are likely to be predominantly car based. Accordingly, the location of the proposed development would fail to meet the objectives of Policies 1 and 5 of the Hertfordshire Local Transport Plan (LTP4) in respect of encouraging movement by sustainable transport modes and reducing travel demand”.

Thus, again there is a considerable inconsistency with the reporting by Highways.

3.4 The infrequent bus and train service create a dis-incentive for residents to use them, especially since passengers could be left with a significant wait to return home on the last leg of their journey.

4. Walking

4.1 The proposed site would be further away from all facilities than the existing Park Street settlement, since it would be more northerly than “mainstream” Park Street. Thus it is not appropriate to merely accept ward data based on St Albans 019 MSOA, which the appellant has done in their assessment.



4.2 From most of Park Street, limited facilities are within walking distance, but this is not the case from the proposed houses, where the only shop close by is within the petrol filling station at the north end of the proposed site.

4.3 Park Street is the only train station within ‘walking distance’ that is at all reachable from the site and in real terms would be a substantial distance away from any new homes as already described. The primary shopping area for Park Street residents is How Wood shops which are beyond reasonable walking distance of the proposed development. Especially as we tend not to depend upon a convenience store, takeaway, barbers and a gun shop for our everyday needs. The schools are not walkable for younger children. Thus this location would require a higher car usage than the main area of Park Street and makes it an un-sustainable location.

4.4 Pedestrian entry/exit would be dangerous for many residents as they would be required to use narrow tracks that run outside the site, or to cross a busy road, away from any pedestrian crossing.

4.5 The proposed Toucan Crossing would only be of use, to those wishing to access the tunnel under the A414 or the petrol station shop from the northern part of the site. Using it to access any facilities in Park Street to the south, increase the journey to 650m, making it impractical for these journeys.

5. Cycling

5.1 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.

5.2 The appellant is promoting the prospect of Active Travel, using the Toucan crossing and tunnel underneath the A414 as a likely route for future residents wishing to access the City Centre, but the reality is somewhat different. The location of this site next to very busy roads and the considerable distance, along with adverse topography, to the main City railway station, means that any implementation of cycle friendly measures would not bring about any significant reduction in car use. Currently existing residents in nearby houses need to rely on their cars, and there is no reason to believe that new residents of the proposed development would act any different.

5.3 The logistics of using a disgusting, usually dark, dingy underground route with offensive graffiti and often with standing water, which sometimes does help dissipate the smell of urine, is not palatable for local residents (Appendix E). The Council considered the graffiti too offensive to publish on the planning portal website, so redacted all of the offensive words. The portal was only likely to be seen by adults, however residents are



expected to take, or allow their children to use the tunnel and be exposed to it on a regular basis.

5.4 Having negotiated the offensively decorated subterranean transit route, pedestrians and cyclists would be faced with two steep hills to climb, over a 1.5 mile (2.4km) onward journey, to reach the centre of St Albans, in addition to the 0.5 mile (0.8km) journey to reach this point.

6. Distances to Key Facilities

6.1 As no facilities of any kind will be built within the proposed development, new residents will first of all need to exit the site, before making their way to their destination. The bulk of the houses are in the wider southern end of the site.

6.2 From the appellant's layout plan version 3, revision F (**CD2.5**), a point in front of plot 62 in the development was selected, which was considered to be a reasonable mid-point. From this point, two distances were measured; 230 metres to the southerly pedestrian exit point and 585 metres to the most northerly pedestrian exit point, close to the Toucan crossing. By taking a mid-point in the development, there must be recognition that some houses will have shorter exit routes and some longer. However whilst units in the most northerly part of the site may be closer to an exit, the distance that they would need to walk when accessing any facilities in Park Street, would be as long as those in the southern part of the site, since they first of all must reach the southerly exit point. Alternatively they could exit the site sooner, but walk an additional distance outside the site.

6.3 From these two exit points distances were measured to key facilities either to the south from the southerly exit, or to the north from the northerly exit and can be seen in Appendix F and the corresponding maps at Appendix G. Depending on the starting point within the site, the pedestrian may need to use the unsafe track on the outside of the site, or cross over Watling Street to the safe eastern side, away from a pedestrian crossing. A third alternative would be to elongate the journey by using the less direct internal roads within the new development.

6.4 **Shop at the Filling Station** – Although this is the closest facility to the site, which would be easy to access from within the new internal site roads, the distance from the mid-point is still 485m. Apart from the 14 most northerly units, the next closest unit would be 260m away from the filling station and the furthest being approximately 600m away. There are limited purchase options at the store and it is expensive (Marks & Spencer), however it can be useful for obtaining a ready meal, bottle of wine or sweets.

6.5 **Marlborough Science Academy (Senior School)** – This is the only senior school at all within walking distance of the site and is approximately 1,610m away from the mid-point. The route to the school would first of all be through the internal roads to the new Toucan



Crossing. From there the children would need to use the tunnel underneath the A414 with abusive graffiti. The other side, they would climb up Watling Street, crossing the road where they felt it safe to do so, before eventually arriving at the school. During the darker winter months children may find the enclosed tunnel rather threatening.

6.6 Midway Doctor's Surgery – The contribution in the S106 agreement is said to enhance the facilities at Midway Surgery, which is the largest closest doctors' surgery to most residents in Park Street. On foot this is approximately 2,340m away (c1 ½ miles). Similar to accessing the senior school, the journey would be via the tunnel with abusive graffiti, and up a steep hill. Towards the top of the hill the patient would follow a route through residential roads, eventually arriving at Watford Road, where they would head south and arrive at the surgery. It would be wholly un-realistic for anybody not feeling 100% to make this journey on foot, and quite ridiculous to expect it to be made with a sick child. No bus route goes near the surgery, so the only means of accessing the doctor would be via car or taxi.

6.7 Killigrew Nursery and Junior School – This is a selection for some parents, although is technically outside the catchment at 2,820m away (1 ¾ miles). The route to this would be the same as Midway surgery, with a further 500m at the end. This would also involve taking the young children through the tunnel with abusive graffiti. No bus route goes near the school from Park Street, so the only means of reaching the school would be by car.

6.8 Park Street Station – Section 2 above deals in detail with the station access. The only safe route would be 780m from the mid-point in the site.

6.9 Takeaway – The closest food takeaway is in Park Street village. This is 875m from the mid-point. Due to the distance, it is likely that any food purchased would be cold by the time the meal reached home if walking. Realistically, they would need to drive to collect the food.

6.10 Convenience Store – This is located opposite the Takeaway at 895m from the mid-point of the site. There is a quite limited selection of products available and used by residents to “top up” any missing items. If they were buying any bulky or heavy items they would need to use a car.

6.11 Recreation Ground – Past the takeaway and a little way along Park Street Lane is a recreation ground with football pitch, but this is 1,015m away.

6.12 Branch Road Nursery and Junior School – This is the closest nursery/junior school to the site at 1,280m, but is a considerable distance for a young child to walk. They would not be permitted to walk alone, since the journey would be along the busy Watling Street and crossing other roads on the way. Realistically they would be taken to school by car, and there is already an existing problem of access and parking.



6.13 **How Wood Nursery and Junior School** – This is the second closest nursery/junior school to the site at 1,375m, so is also a considerable distance for a young child to walk. The first part of the route would be the same as for Branch Road school, along the busy Watling Street, so again realistically they would be taken to school by car, although there is already an existing issue of parking at the school.

6.14 **Park Street Doctor's Surgery** – Whilst Midway surgery is the largest doctor's surgery servicing the area, there is also Park Street Surgery, which is off the map to the south. This is 2.1 km away, so similar to Midway. However, this operates as a satellite to a surgery in Radlett and has doctors that visit part-time during the week. Due to the lack of facilities, any basic procedure, including sample submissions need to be delivered to Radlett. No bus services the area where it is located, and due to the distance, especially if the patient then needs to travel to Radlett, a car is required.

6.15 **Chemist** – The closest chemist is at How Wood. Here there is a small parade of shops used by Park Street residents, however “mainstream” Park Street is much closer than the new development. The journey to the chemist would be along Watling Street, Park Street Lane, and then Penn Road. There are alleyways that can be used towards the end of the journey, but these do not reduce the length of the journey which is 1,945m. A car would need to be used for this visit.

6.16 **Small Supermarket** – There is a small supermarket in the same parade of shops as the Chemist. It is a small co-op with a limited range of items, but useful for anything less than a weekly shop. This is 1,965m away and would require car, even if no heavy or bulky goods were being purchased.

6.17 **Large Supermarket (Sainsburys)** – The closest large supermarket where residents might expect to do their weekly shopping is Sainsburys, which is 2.25km (1.4 miles) away. This requires a journey uphill along Watling Street and would be far too far to walk, especially if carrying shopping. A car or taxi would usually be required. Although the infrequent 601 bus passes close to the store, this would not be feasible with heavy shopping, unless the resident lived in one of the 23 properties closest to the bus stop.

6.18 **St Albans City Station** – Whilst Park Street station is the least used in Hertfordshire, St Albans City is the second busiest. This does not feature on the maps, since it is too far away from Park Street, at 4.0km (2 ½ miles), via side roads. This journey is difficult, since it entails travelling up two steep hills (Watling Street and Holywell Hill). Current residents travel to the station by car due to the distance. Whilst in theory it could be cycled, due to the topography it is not done. This is particularly the case, because the commuter invariable needs to arrive at work in a clean enough state to conduct their business and a sweaty cycle at the outset of the day, would not be conducive to this. The 601 bus does go to the station from



close to the site, however the logistics of using it to access the station, then traveling to London would only be workable, if the one relevant bus was not cancelled, or missed.

This would involve a 400m walk to the bus stop, catching the 07.36 (07.34 at Park Street station), arrive at City station at 08.00. Catching the 08.11 will arrive at 8.34 at St Pancras, allowing for a short underground journey to arrive in Central London around 9am. The next bus would be at 8.24, arriving at St Albans City at 8.50. Catching the train at 8.57 would arrive at St Pancras at 09.19, which would be too late to arrive anywhere in London much before 10am.

Returning would be feasible catching the bus back from the station at 17.55 or 18.31. However, the last bus from City station is 19.36, so should the job entail any late finishes, a taxi ride home would be required. Also an hour's wait might be required if the previous bus had just been missed.

6.19 Radlett Station – In the opposite direction is the Thameslink Station at Radlett. 5.34km away (3.3 miles). Again, residents access this station by car due to the distance, although most travel via St Albans City station, because the service is faster with more non-stopping trains.

6.20 From the analysis of the journeys to all of the key facilities required for everyday living, it is obvious that a car would be essential for new residents. Residents of properties close by have found this to be the case over the past years, and there is nothing to suggest that any new residents would behave any differently. The site is more remote from the limited shops at How Wood than most locations in Park Street, so these would not be a realistic option to use without a car.

7. Midway GP Surgery

As part of any agreement with a potential developer, an S106 agreement would be entered into, in order to provide additional finance to the local health service, specifically the local Midway Surgery. Such a contribution would not overcome the problem that there is insufficient infrastructure at the surgery to cope with a large increase in patients. The surgery is not currently able to offer an adequate service to existing patients. Additionally, several large developments have already been given approval in Chiswell Green, which themselves will add over 2,500 patients to Midway's list, assuming that they don't close the list before they are completed. Either way the burden on the local health service will take it yet further beyond breaking point.

8. Car Usage

When assessing each service, it is obvious that new residents would need at least one car to enjoy everyday living. This should not come as any surprise, since the residents of nearby



properties built in the 1930s have recognised this for many years. It does however mean that if this scheme proceeded, there would be an increase in car usage, probably with every household having one, and in many cases more cars, since it is not sustainable in 2024 terms.

