

Colney Heath Parish Council (CHPC)

This is the Parish Council prepared detailed response to the full application for planning application 5/2020/1992 – Land at Roundhouse Farm

CHPC Comments in purple throughout

Planning History

Welwyn Hatfield Borough Council (WHBC)

No record has been found within Welwyn Hatfield BC call for sites since 2014

The site was not promoted for development so has not been assessed alongside other sites within Welwyn Hatfield. It has not been subject to an independent review along other sites within Welwyn Hatfield on its suitability for development.

St Albans District Council (SADC)

The site was promoted for development in St Albans DC call for site in 2009 and has been retained in later call for site assessment ref. SHLAA 2009-CH-37

St Albans DC decided only to assess larger sites (Broad Locations, 11 Hectares or 500 dwellings) within the Local Plan as smaller sites would not provide the additional infrastructure required.

St Albans DC SHLAA assessment - site suitability

Physical Constraints			
Area of flood risk	No	SSSI	No
Ancient Woodland	No	Local Nature Reserve	No
County Wildlife Site	No	Poor access	No
Site of Geological Importance	No	Steep slopes/uneven terrain	No
Scheduled Ancient Monument	No	No Ground contamination	None identified
Site for Local Preservation (archaeological)	No	Proximity of Locally Listed Building(s)	No
Proximity of Listed Building(s)	Yes	Historic Park or Garden	No
Air Quality Management Area	No	Conservation Area	No
Tree and hedgerows	Yes	Other habitat/green space	Yes
Proximity to Hazardous Installations (as per Policy 84b)	No	Public Right of Way	Yes
		Utilities – e.g. electricity substations, pylons, telecom masts, underground pipelines, sewers etc	None identified
Minerals and waste site (i.e. development would result in the sterilisation of mineral reserves)	No	Site is adversely affected by noise, air or other forms of pollution (e.g. major roads etc)	Yes
Development would cause demonstrable harm to the character and amenity of surrounding areas/land uses	Possibly	Development would involve land that could otherwise help to meet the objectives of Watling Chase Community Forest	Yes
Development would result in unrestricted sprawl of large built up areas.	No	Scale and nature of development would be large enough to significantly change size and character of the settlement.	Yes
Development would result in neighbouring towns merging into one another.	No	Development would result in encroachment into open countryside.	Yes
Development of the site would affect land that is presently rural rather than urban in nature	Yes	Development would be visually intrusive from the surrounding countryside	Yes
Development would assist in urban regeneration by encouraging the recycling of derelict and other urban land.	No	Existing Green Belt boundary is well defined	n/a
Removal of the site from the Green Belt would create additional development pressure on adjoining land	Unlikely	Release of the site from the Green Belt would create a more clearly defined, robust long-term boundary	n/a
Development would affect the setting and special character of St Albans (i.e. the Ver Valley to the south & west of the City); Harpenden (i.e. the southern approach across the Common); or the historic centres of Redbourn or Wheathampstead			

Policy Constraints			
Loss of high quality agricultural land (Grades 1,2 or 3a)	TBC	Green spaces identified for protection in the Green Spaces Strategy	No
Landscape Character Area - i.e. those areas where emphasis is on conservation	Yes HCC Area 29	Site with social or community value (provide details)	No
Tree Preservation Orders	No	Greenfield site	Yes
Comments/observations (including details of any other national, regional or local policy constraints):			
Can any of the physical or policy constraints identified above, be overcome or could mitigation measures be introduced to reduce any potential impacts identified?			
Officers Conclusions - Stage 1 (i.e. should this site be given further consideration for housing development? If no, provide reasons)	<p>No.</p> <p>The site comprises agricultural land which is rural in character. Its development would constitute visual intrusion and encroachment into open countryside.</p> <p>Development of this relatively large site (approx. 5 ha) could have a significant adverse effect on the size and character of Colney Heath village, where infrastructure is already stretched.</p> <p>Development would also be likely to have an adverse effect on the setting of No. 68 Roestock Lane, a Grade II listed house, which lies to the north of the site and could prevent the land from making a positive contribution to the Watling Chase Community Forest.</p>		

Previous Planning Applications

St Albans DC

5/1986/0487 Outline application for the residential development of 2.44ha of land.

5/1987/0185 Residential development.

Welwyn Hatfield

None

Planning Statement extracts

Please note:

The in italics are comments made by applicant promoting the scheme

For those wishing to understand the detailed planning issues in this application it is recommended to read section 5 of the applicant's submission

5.1 The application seeks permission for up to 100 homes in Colney Heath, thereby making a contribution to the housing requirements of SADC and WBHC. Both of these LPAs have Local Plans that were adopted decades ago and are considered substantially out-of-date. Both LPA areas also contain a high proportion of land covered by Metropolitan Green Belt (MGB), which has contributed to preventing the delivery of much needed new housing. The respective emerging Local Plans of these authorities are either likely to fail tests of legal compliance and soundness (in the case of the St Albans), or are a considerable way off from being adopted (As is the situation in Welwyn Hatfield) as detailed within the Planning Policy section above. Consequently, neither LPA is in a position to bolster its supply of housing to meet local housing need.

5.3 Given the sites location adjoining a settlement that is washed over by the MGB, an assessment is required as to whether there are "very special circumstances" (VSC) that justify development within the MGB. The following paragraphs identify a number of material considerations that collectively and cumulatively present the VSCs for development at the application site. Summarily, these include:

- The site is essentially "captured" Green Belt land. That is, it contributes little or nothing to the purposes of including land within the Green Belt and was essentially included by default when large swathes of the countryside between major settlements in Hertfordshire were designated as MGB over 20 years ago;*
- The considerable need for new housing in both St. Albans District and Welwyn Hatfield Borough.*
- The impacts of the Coronavirus pandemic on housing delivery; and*
- The suitability of the site in sustainability terms*

5.80 Both LPAs, but particularly St. Albans, have proposed major and strategic Green Belt land releases to address this question yet have eminently failed to fully acknowledge the substantive benefits of delivering smaller sites. They are delivered quicker, do not have the burden associated with the economic implications for the developer of releasing large amounts of housing in one site at one time, make an immediate contribution to housing that is so desperately needed now, and thus the 5 year supply of deliverable sites.

Paras 5.1, 5.3 and 5.80 do not take into consideration the need for local infrastructure (schools, Medical care, Highways improvements) nor the reason St Albans DC have been considering larger sites only as they will provide the required additional infrastructure from the associated section 106 contributions.

Paras 5.1, 5.3 and 5.80 do not note that the area is in

- 1) HCC landscape Character Area 30 which is an area for protection and improvement.
- 2) Falls within the Watling Chase Community Forest.

Both of these are aiming to protect and improve both the natural and living environment within the area.

5.88 On the matter of farmland, it is critical to note that according to the ONS over 70% of Green Belt land is agricultural land. Over 10% of it is woodland, and less than 5% identified as 'natural landscape'. The remainder of Green Belt is built upon.

The Agricultural Land Report submitted with this application demonstrates that the site is in fact a small field, essentially isolated, in that it is leased and does not form part of a wider holding.

There are access issues to it given farm vehicles must travel along narrow residential roads with parked cars along them to reach the access and its economic benefit is limited.

Para 5.88 highlights the difficulties all vehicles will have entering and leaving the site

6.7 The TA includes an assessment to calculate the likely vehicular trip generation of the proposed development and based upon figures extracted from the TRICS database, the development is predicted to generate 48 two-way trips during the AM peak hour and 49 two-way trips during the PM peak hour.

This equates to approximately less than one vehicle per minute travelling in either direction either to or from the site at peak times, which is unlikely to have any noticeable impact on the surrounding highway network.

Para 6.7 statement is contrary statement 5.88 where the applicant states problems with farm vehicles entering and leaving the site, both cannot be true.

The number of vehicular trips appears low given that the village is highly dependent on cars due to the limited bus service.

6.9 The nearest bus stop to the site is located approximately 400m from the site on Hall Gardens Road which equates to a short 5-minute walk and is therefore easily accessible for any future residents. The bus stop serves the Routes 200, 230, 305 and 312 which facilitate access to Essendon, Brookmans Park, London Colney, Welwyn Garden City, St. Albans, Potters Bar, Sandridge and Hatfield. The TA details a number of these destinations together with journey times and service frequency, all are noted to be no more than 30- minutes by bus, with services operating throughout the week for users.

Para 6.9 does not include the detail of the paucity of public transport

Route 200 Welwyn Garden City - Colney Fields

Monday only, dept 10.26 Colney Heath, returns Colney Heath 12.40

Route 230 Welwyn Garden City - St Albans

Wednesday arrives Colney Heath 11.14 returns Colney Heath 14.23

Route 305 Potter Bar -Sandridge

2 through journeys daily in each direction arrive 7.33,16.44

Returns Colney Heath 16.17,17.47

2 start/terminate in the village daily in each direction 10.12 and 13.12

No bus service on Sundays

6.12 Given the sustainable transport links available to the users of the site, along with adequate bus services, it is considered that the site lies in a sustainable location and there would be no unacceptable impacts on the surrounding highway network as a result of the development. The proposals are compliant with, or are capable of being compliant with, the below policies of the adopted Local Plans:

Para 6.12 There are not sustainable transport links available to the users of the site or adequate bus services

6.58 The survey result reports that the land quality across the site is limited by the interaction of soil texture and wetness to sub-grade 3a.

NPPF protects grade 3a Land

Best and most versatile agricultural land: Land in grades 1, 2 and 3a of the Agricultural Land Classification.

NPPF Para 53 Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality, grade 3a is better more versatile land grade.

6.74 The nearest watercourse is the River Colne, over 0.5km from the site. A number of ditches exist adjacent to the site boundaries; however, these were found to be too shallow for a feasible solution, nor do they appear to have an outfall beyond the site.

Para 6.74

The surface water flooding map records surface water flooding in the area this was also noted by CHNP survey with recorded full ditches leading to flooding.

7.3 It is acknowledged that the site lies within the MGB and that there will be some harm to the “openness” of the land from its development for housing, although perception of this will largely be limited to within the site itself. The LVA produced by FPCR also demonstrates that the site makes only a very limited to no contribution to the purposes for including land within the Green Belt.

Para 7.3 assessment differs from the St Albans and Welwyn Hatfield assessment carried out by SKM.

The SKM Green Belt assessment recorded this has having significant benefits to Green Belt purposes in safeguarding the countryside from encroachment and maintaining the existing settlement pattern. They also identified this area has having partial purposes to Green Belt in Preventing neighbouring towns from merging and in preserving the setting and special character of historic towns.

Green Belt

The entire site is within the Green Belt

The site outside Colney Heath Green Belt Community envelopes but is between the two eastern sections of the, therefore Green Belt policies apply.

National Planning Policy Framework (NPPF) -

13. Protecting Green Belt land

133. 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.

134. Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas.*
- b) to prevent neighbouring towns merging into one another.*
- c) to assist in safeguarding the countryside from encroachment.*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

Proposals affecting the Green Belt

143. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

144. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

145. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

- a) buildings for agriculture and forestry.*
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building.*
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces.*
- e) limited infilling in villages.*
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*
- g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:
 - not have a greater impact on the openness of the Green Belt than the existing development; or*
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority.**

District Councils Green Belt assessment

SKM Environs have carried a Green Belt assessment for Dacorum, Welwyn Hatfield and St Albans District Councils. While the areas assessed are quite large, they have been included to an additional assessment within Colney Heath Neighbourhood Plan assessments.

The Assessment Criteria for the Green Belt Review Purposes Assessment is set out below. The full methodology is set out in Chapter 5 of their Final Report.

Presentation of Contribution to Green Belt Purposes
Significant contribution to GB purpose
Partial contribution to GB purpose
Limited or no contribution to GB purpose

Since this review has been completed HCC has identified the A414 corridor as being the location for 50,000 new homes over the next 25 years. With location of a number of sites being currently considered and/or evaluated in St Albans and Welwyn Hatfield Local Plans the value of this area to the Green Belt may well change in the future.

This while still at draft stage consideration should be given to other significant proposed developments in the area

- Former Hatfield Aerodrome (HAT 2)
- Symondshyde Garden village
- Rail freight Terminal (Park Street) this already has planning consent
- Hertsmere Garden Village (either side of Coursers Road)

This assessment includes an area beyond the Neighbourhood Plan area

To check the unrestricted sprawl of large built-up areas	LIMITED / NO
The parcel is located away from large built-up areas of London, Luton and Dunstable and Stevenage. It does not form a connection with a wider network of parcels to restrict sprawl	
To prevent neighbouring towns from merging	PARTIAL
The parcel does not fully separate neighbouring 1st tier settlements. However, it contributes with GB33, 35 and 36 towards the strategic gap between St Albans and Hatfield. As a whole, the gap contains some built development and ribbon development associated to 3rd tier settlements in the Green Belt. Overall, any minor reduction in the gap would be unlikely compromise the separation of 1st tier settlements in physical or visual terms, or overall visual openness.	
To assist in safeguarding the countryside from encroachment	SIGNIFICANT
The parcel displays typical rural and countryside characteristics, especially to the south, in medium sized arable fields with hedgerow boundaries, sheep pasture and substantial riverine wetland habitats along the Colne, and areas of heath and semi natural grassland which are locally important at Colney Heath. Tyttenhanger Park and Hall is located to the south. There is evidence of linear built development in the north part of the parcel which contains Colney Heath and Bullens Green. The A1(M) is also a major urban influence which is audibly intrusive. Levels of openness are generally high especially to the south due to an absence of built development	
To preserve the setting and special character of historic towns	PARTIAL
The parcel adjoins London Colney and Sleafshyde conservation areas however visual connection or views are limited by local routes and wooded areas. Tyttenhanger Park the setting of the Hall is encircled by sand and gravel working and mounds of overburden and spoil, with associated conveyor belts and plant at present but future restoration should remedy this impact in countryside character.	
To maintain existing settlement pattern	SIGNIFICANT
The parcel provides a range of gaps. It provides the primary local gap between Hatfield (1st) and London Colney (2nd) and contributes with parcels GB33 to GB36 and GB43B to the overall gap with St Albans. The gap is large at 4.3km but contains ribbon development at Colney Heath (3rd) and Bullens End (3rd). The gap to the south to Colney Heath is 2.6km and well maintained (relatively free of development) however the gap to the north is more built up and narrower at 1.7km. Therefore any reduction in the gaps would compromise the separation of settlements in physical and visual terms to the north, and local levels of visual openness. A minor reduction to the south would lead to a less significant impact	

Existence of built development. The level of built development is low at 1.0%. Some ribbon development has taken place especially around villages to the north and east of the parcel.

Affordable housing

1.3 The proposed development is for up to 100 dwellings, of which 45% (up to 45 dwellings) are to be provided as affordable housing. This exceeds the requirements of policy 7A (30%) of the St Albans District Local Plan Review (1994); policy H7 (30%) of the Welwyn Hatfield District Plan (2005); and emerging policy SP7 (35%) of the emerging Welwyn Hatfield Borough Council Local Plan 2013-2032

The NPPF 2018 describes Affordable Homes (AH) as 'housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers), and which complies with one or more of the following definitions':

Affordable housing for rent: Housing owned by a registered provider (except where part of a Build to Rent scheme) which is rented in accordance with the national rent policy for Social Rent or Affordable Rent or is at least 20% below local market rents, with provision made for it to remain at an affordable price for future households or for the subsidy to be recycled for alternative affordable housing provision.

Starter Homes: New-build housing available for purchase by qualifying first-time buyers at a minimum of 20% below the market price, with sale prices subject to a cap of £450,000 in London and £250,000 outside London.

Discounted market sales housing: Housing for sale to eligible buyers at a discount of at least 20% below local market value, with provision made for it to remain at a discount for future households.

Both St Albans and Welwyn Hatfield have failed to meet affordable housing demand.

Year	Affordable Housing Completions (net)	2016 SHMA net Annual Need	Shortfall in Affordable Housing Delivery	Shortfall Delivery as a % of the Assessed Need
2013/14	-42	617	-659	-107%
2014/15	70	617	-547	-89%
2015/16	97	617	-520	-84%
2016/17	Unknown	n/a	Unknown	Unknown
2017/18	22	617	-595	-98%
2018/19	115	617	-502	-81%
Totals	262	3085	-2822	-92%

St Albans Affordable Housing delivery

Year	Affordable Housing Completions (net)	2016 SHMA net Annual Need	Shortfall in Affordable Housing Delivery	Shortfall Delivery as a % of the Assessed Need
2015/16	49	818	-769	-94%
2016/17	16	818	-802	-98%
2017/18	-5	818	-823	-101%
2018/19	34	818	-784	-98%
2019/20	7	818	-811	-99%
Totals	101	4090	-3989	-98%

Welwyn Hatfield Affordable Housing Delivery

Affordability Indicators for St Albans - Average Affordability Ratio

4.3 The National Housing Federation (NHF) Home Truths report shows that in the period between 2013/14 and 2017/18 the average house price to average income ratio within the district increased from 10.5 to 13 which represents a 24% change. Lower Quartile Affordability Ratio

4.4 For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), the situation is even worse. The lower quartile house price to incomes ratio in St Albans has increased by 24% from 13.23 in 2013/14 to 16.92 in 2019/20

Affordability Indicators for Welwyn Hatfield - Average Affordability Ratio

4.13 The National Housing Federation (NHF) Home Truths report shows that in the period between 2013/14 and 2017/18 the average house price to average income ratio within the borough increased from 11.9 to 15 which represents a 26% change. Lower Quartile Affordability Ratio

4.14 For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), the situation is even worse. The lower quartile house price to incomes ratio in Welwyn Hatfield has increased by 27% from 9.08 in 2013/14 to in 11.54 2019/20

House prices in Colney Heath (Zoopla 1/10/2020)

Colney Heath	£520,531
High Street	£434,544
Roestock Lane	£552,500
Bullens Green Lane	£554,016

Therefore, the average cost of an affordable home would be in region of £420,000

The application states that the development will contain the following homes

<i>Market Housing</i>	<i>45 units</i>
<i>Social, Affordable or intermediate rent</i>	<i>38 units</i>
<i>Affordable Home Ownership</i>	<i>7 units</i>
<i>Self-build and Custom Build</i>	<i>10 units</i>

Design and Access

2.1.7 The large village offers flexibility and diversity for locals by providing amenities; a number of academies, shopping, leisure and health services exist close to the site.

Para 2.1.7 implies the site is within the village

Colney Heath Village does not *'offer flexibility and diversity for locals by providing amenities; a number of academies, shopping, leisure and health services exist close to the site.*

The village only has a primary School, one post office/convenience store, one take-way, a church, football club and scouts and guides units.

4.10.4. Whilst the proposed development would have no impact on the major elements of the listed building's significance as a designated heritage asset, the report concludes that the implementation of the development proposals would result in a degree of harm being caused to this listed building through change to its wider setting.

5.2.4. Secondly, with a listed building to the North-West of the site careful and sensitive planning is needed. Therefore, it is prudent to locate open space to the north-western corner to create a buffer between the listed building and the new development minimizing the impact on the setting of this listed building.

Traffic and Transport

This section of the application contains a very considerable number of errors and omissions do not reflect the reality in Colney Heath village.

Errors

- Data used relates the civil parish of Colney Heath E04004802 rather than the smaller village of Colney which is separated from the main area of the parish by A414.
- Issues related to bus services and timetabling, not running at suitable time or suitable routes.

Omissions

- The walking distances in 4.3 fails to include the 'desirable' and 'acceptable' walking distances as defined by Chartered Institute of Highways & Transportation.
- HCC Comet Traffic modelling which highlights traffic congestion in and around the village.
- Hertsmere's proposed Garden Village either side of Coursers Road.
- Fails to note within the traffic section that the farmer has a problem with bringing agricultural vehicles to the site.
- Fails to consider safety when cycling.

Transport Assessment

3.8 NPPF Paragraph 109 states that developments should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impact on the road network would be severe.

3.11 Walking is widely considered to be the most important mode of travel at the local level and offers the greatest potential to replace short car trips, particularly for journeys of less than 2km. It is also important to provide sustainable routes for journeys of greater distances through the provision of a high quality, safe, secure and reliable network of routes, with good interchanges, which match the pattern of travel demand in order to maximise public transport patronage.

4.3 Based on the Chartered Institute of Highways and Transportation (CIHT) publication 'Providing Journeys on Foot'; the preferred maximum walking distance for the purposes of commuting / school journeys / sight-seeing is 2km. All of Colney Heath is accessible within 2km of the proposed development site.

Table 3.2: Suggested Acceptable Walking Distance.

Chartered Institute of Highways and Transportation (CIHT) publication 'Providing Journeys on Foot' - Full data

	Town centres (m)	Commuting/School Sight-seeing (m)	Elsewhere (m)
Desirable	200	500	400
Acceptable	400	1000	800
Preferred maximum	800	2000	1200

Colney Heath Neighbourhood Plan (CHNP) assessed data

Primary school	Colney Heath 1.2km
Secondary schools	Bishops Hatfield Girls School 2.55km Onslow School 2.95km

The Ministry of Housing, Communities & Local Government gives the reference code of E04004802 to civil parish of Colney Heath rather than the village of Colney Heath

Colney Heath village is separated from the main area of the parish by A414 and many of the local roads are busy with traffic and notably with HGV traffic.

The data used relates to the entire parish of Colney Heath E04004802 rather than Colney Heath village.

The data used is heavy biased by larger population within urban areas of the parish

The urban part of the parish, approximately 53% of the electorate and 3.4% of the total area, is effectively part of St Albans with employment opportunities available with good public transport access from the residential areas, predominantly Highfield. Public transport especially on the main arterial routes such as London Road (A10811) and Hatfield Road (A1057) has a regular timetable throughout the day.

The rural part of the Parish, particularly the 27% of the parish electorate living in Colney Heath village have very limited public transport

CHPC believe the assessments and relevant using this data are fundamentally flawed

The relevant paragraphs are

4.8, 4.9; 4.15, 4.16, 4.27, 4.28,
4.31, 4.35, 4.36, 4.37, 4.41,
4.43, 4.44

4.8 2011 Census data shows that 6.1% of the residents that regularly commute to work as recorded for the 2011 Parish of 'Colney Heath: E04004802'; do so by foot. This is less than the national average of 10.9%.

4.9 Census data from 2011 also shows that 10.5% of 'Colney Heath: E04004802' commuters live within 2km of their place of work. This suggests that over half of the residents who could reasonably be expected to walk to work, already do so.

4.15 2011 Census data shows that 1.3% of residents commuting to places of work from within 'Colney Heath: 04004802', do so by bicycle. This is less than the national average of 3.2%.

4.16 Census data from 2011 also shows that 33.7% of 'Colney Heath: 04004802' commuters live within 5km of their place of work, where approximately 10.5% are considered to live within a walkable commute to work. Therefore, some 23.1% of residents for the aforementioned Parish area could reasonably take up cycling as a main mode of travel to work whilst maintaining a journey time that does not exceed 30

minutes. Given the percentage of residents living within this commutable distance, there is potential to increase the level of cycling amongst residents of the area.

4.27 2011 Census data shows that 2.4% of the residents that regularly commute to work from within 'Colney Heath: E04004802'; do so by bus, minibus or coach. This is less than the national average of 8.2%.

4.28 Census data from 2011 also shows that 50% of 'Colney Heath: E04004802' commuters live within 10km of their place of work. However, it should be noted that around 33.7% of these residents are considered to live within a reasonable walking or cycling distance. Therefore; 16.4% of these residents are considered to live a sufficient distance from their place of work that would specifically benefit from travel by public bus.

4.31 The nearest railway station to the site is Welham Green Train Station, which is accessible within 3.5km of the site, equating to a 12-minute cycle or 5-minute drive. Additionally, St Albans Train Station is accessible within 7.8km of the site, equating to a 29-minute cycle or 13-minute drive. It is also important to note that both of these stations are accessible via the aforementioned bus services. The stations are located on the East Coast Mainline, with services operated by Great Northern. A map showing the extent of destinations accessible by train from Welham Green, in addition to St Albans is included in Appendix E.

4.35 2011 Census data shows that 14.9% of the residents that regularly commute to work within 'Colney Heath: 04004802'; do so by train. This is far above the national average of 5.7%.

4.36 Census data from 2011 also shows that 50% of 'Colney Heath: 04004802' commuters live further than 10km from their place of work, equating to approximately 1,201 people. Given the encouraging figures of existing train use, there is still potential for this to increase. This is anticipated to be achievable through the measures outlined in the Green Travel Plan.

4.37 It is probable that the high proportion of individuals commuting by train can be attributed to the number of train stations within a short distance of Colney Heath. This may also partly be a cause for the reduced number of individuals who travel by bus.

Access to Employment 4.40 Main commercial centres tend to contain the main employment opportunities within any area. Large employment areas such as Hatfield and St Albans are all easily accessible by bus and rail from the site.

4.41 It is reasonable to assume that a proportion of the residents of the proposed development will be drawn to St Albans, London, Welwyn Hatfield and Hertsmere. Census information taken from the 2011 journey to work dataset for Colney Heath corroborates the popularity of the aforementioned locations as key workplace destinations. Therefore, it is logical to assume that residents will use the available public transport to access these locations.

Access to Schools 4.42 Access to education is considered to be particularly important on this site as it is anticipated that young families will acquire a number of the properties. Therefore, trips for educational purposes will potentially account for a large proportion of the overall site trip generation.

4.43 The site is well served by existing educational facilities with a number of schools located within a reasonable journey by foot or bicycle. These include nurseries, in addition to primary and secondary schools, and a university campus.

4.44 The closest nursery to the site, named University Day Nursery, is located approximately 1.8km to the north of the site on Roehyde Way, and is accessible within a 22-minute walk, or 6-minute cycle. The closest primary school to the site, named Colney Heath School & Nursery, is situated approximately 1.6km to the west of the site on High Street, and is accessible within a 19-minute walk. The closest secondary school to the site, named Beaumont School, is located approximately 4.8km to the west of the site on Austen Way, equating to a 17-minute cycling journey.

Recorded Accident Data

HCC latest (2019) Comet traffic modelling shows a significant increase of traffic in Tollgate Road Colney Heath resulting considerable delays in Tollgate Road this has not been noted nor considered.

The following paragraphs consider the number, frequency and severity of recorded road collisions observed on the surrounding highway network within the most recent 5-year period.

Assessment of Accident Locations

Fellowes Lane / Tollgate Road (T-junction)

5.5 *There have been two incidents located within the immediate vicinity of this junction. The first incident occurred in 2015 and was slight in nature, involving 2 vehicles and 1 casualty. The second incident occurred in 2016 involving 1 vehicle and 1 casualty.*

Fellowes Lane / Bullen's Green Lane (crossroads)

5.6 *There have been no incidents located within the vicinity of this junction.*

High Street / Roestock Lane / Tollgate Road / Coursers Road (roundabout)

5.7 *There have been no incidents located within the vicinity of this junction.*

Proposed Site Access / Bullen's Green Lane (T-junction)

5.8 *There has been one 'serious' incident located within the immediate vicinity of the proposed site access location, which occurred in 2017 and involved one vehicle and one casualty. This incident occurred in wet / damp and dark conditions and was listed as having no 'carriageway hazards'. The collision occurred between the vehicle and a pedestrian who was in the carriageway, not on a designated crossing. For the full details of this accident, please refer to the accident report included in Appendix F.*

Summary

5.9 *From the accident data presented, there does not appear to be any significant accident pattern which could be exacerbated by the proposed residential development.*

5.10 *As a result of the proposed development, the safety of the surrounding highway network and its users is not considered to be put at a significantly adverse risk; therefore, the anticipated impact should be considered acceptable for planning purposes.*

HCC latest (2019) Comet traffic modelling shows a significant increase of traffic in Tollgate Road Colney Heath resulting considerable delays in Tollgate Road this has not been noted nor considered.

Table 6.2: Proposed Trip Generation

	Trip Rate (100 dwellings)	
Peak Hour	Arrivals	Departures
AM (08:00-09:00)	12	36
Pm (17.00-18.00)	33	16

With St Albans District having an average 1.44 cars per household (2011 census) this forecast appears very low, considering the limited alternatives to car use for Colney Heath village residents

Committed Development

6.7 The development officer confirmed in the pre-app response that there are no committed developments within the local area that need to be considered within this assessment.

Para 6.7

No account has been taken of the 6000-8000 potential at Bowmans Cross off Coursers Road being actively considered by Hertsmere BC

If developed this would add an additional 11,500 cars on local roads.

Trip Distribution Proposed Development

6.8 The proposed development vehicle distribution has been based on the 2011 Census data for the merged local authority district 'E02004938: St Albans 015' in which the site resides, taking account of the most popular workplace destinations.

Summary and Conclusion

7.5 The site benefits from being located in proximity to several bus stops, which are accessible within a comfortable 10-minute walk. The services operating from these bus stops facilitate access to key locations including Welwyn Garden City, St Albans and Hatfield, amongst other destinations.

Para 7.5 does not reflect reality

The current routes and infrequent services are heavily related to travel to and from school with St Albans only

All other destinations require multi changes resulting in greatly extended journey times. (Please refer to timetables)

7.8 Vehicular access to the site is to be provided off Bullen's Green Lane, via a priority T-junction. A potential pedestrian link is also being considered through the adjacent recreation ground; this is currently being agreed between client and landowner.

Para 7.8

The Statement is factually incorrect.

There is no agreement with CHPC, the head lessee,

It is untrue to say "pedestrian link is also being considered through the adjacent recreation ground.

Green Travel Plan

The travel plan is fundamentally flawed by using Colney Heath E04004802 Data as

- 1) The data relates to all of the parish not just the village, with largest number of residents living in urban area adjoining St Albans, this has significant negative impact on the data used.
- 2) The village is highly dependent on car usage and many residents consider many of the roads in and out of the village too dangerous for cyclists due to high traffic speed and the large number of HGVs using the roads.
- 3) The employment areas are the other side of the parish and well away from the village.

National Guidance

3.1 Within the 'Travel Plans, Transport Assessments and Statements' section of the DCLG, PPG; the definition of a Travel Plan is as follows: 'Travel plans are long term management strategies for integrating proposals for sustainable travel into the planning process. They are based on evidence of the anticipated transport impacts of development and set measures to promote and encourage sustainable travel (such as walking and cycling). They should not, however, be used as an excuse for unfairly penalising drivers and cutting provision for cars in a way that is unsustainable and could have negative impacts on the surrounding streets.'

3.2 The National Planning Policy Framework (NPPF: February 2019) aims to bring about sustainable development and create positive growth, to create economic, environmental and social progress for this and future generations. This revised document supersedes the previous iterations of the NPPF, published in 2012 and 2018.

3.6 NPPF Paragraph 110 states that developments should be located and designed to:

- Give priority first to pedestrian and cycle movements; both within the scheme and within the neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use;
- Address the needs of people with disabilities and reduced mobility in relation to all modes of transport;
- Create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;
- Allow for the efficient delivery of goods and access by service and emergency vehicles; and
- Where possible, be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

7 NPPF Paragraph 109 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

As stated above the travel plan is fundamentally flawed by using Colney Heath E04004802 Data as

5.19 Excluding National Cycle Routes 61 and 12, there does not appear to be any dedicated on-road / off-road cycle provision within the surrounding areas of Colney Heath. As such, the current surrounding highway infrastructure dictates that cyclists travelling within Colney Heath should be travelling within the extent of the carriageway alongside vehicular traffic, as opposed to the adjacent footpaths.

5.20 Considering the nature of the surrounding highways, it can be appreciated that the potential for having a relatively low percentage of residents travelling to work by bicycle could partly be due to the lack of designated cycle provision providing encouragement for this mode of travel. As such, the provision of an independent cycleway in keeping with the scale of the proposed development would only result in the termination point directing cyclists onto the main carriageway, as opposed to joining an existing provision. This provision is therefore not considered to be beneficial.

5.39 Main commercial centres tend to contain the main employment opportunities within any area. Large employment areas such as Hatfield and St Albans are easily accessible by bus and rail from the site.

5.40 It is reasonable to assume that a proportion of the residents of the proposed development will be drawn to St Albans, London and Welwyn Hatfield. Census information taken from the 2011 journey to work dataset for Colney Heath corroborates the popularity of the aforementioned locations as key workplace destinations. Therefore, it is logical to assume that residents will use the available public transport to access these locations.

Travelling from the village bus would place very significant restrictions on hours worked and locations within St Albans due to the current timetables.

5.43 The closest nursery to the site, named University Day Nursery, is located approximately 1.8km to the north of the site on Roehyde Way, and is accessible within a 22-minute walk, or 6-minute cycle. The closest primary school to the site, named Colney Heath School & Nursery, is situated approximately 1.6km to the east of the site on High Street, and is accessible within a 19-minute walk. The closest secondary school is Beaumont School, located approximately 4.8km to the west of the site on Austen Way, equating to a 17-minute cycling journey or 15-minute drive.

Public Transport

7.10 It is considered that the 230 bus service can be used for commuting purposes to Welwyn Garden City and St Albans.

Wednesday only leaving Colney Heath at 11.14 travelling to London Colney and St Albans and returning to the village at 14.23.

Arboricultural Assessment

No tree preservation orders on this site found

Welwyn Hatfield - The Council will support delivering the aims of the Watling Chase Community Forest through the appropriate retention and protection of trees, or planting of new and replacement trees

5.25 There are no ancient or veteran trees associated with the site thus policies relating to these trees are not engaged.

The parish council wish to request tree preservation orders are places on the key tree on the site whatever out come this application is.

The arboricultural assessment makes it clear the importance of surrounding trees and hedgerows to the character of the area, so if minded to grant a condition should be included so they are protected into the future.

Archaeology and Heritage Assessments

No archaeological assets reported on the site, the geophysical survey was unable to complete the untie site due to existing crops.

The Grade II listed building at 68 Roestock Lane was noted but the impact on from the development was considered to be minor due to mature rear garden.

See also Design and Assess 4.10.4

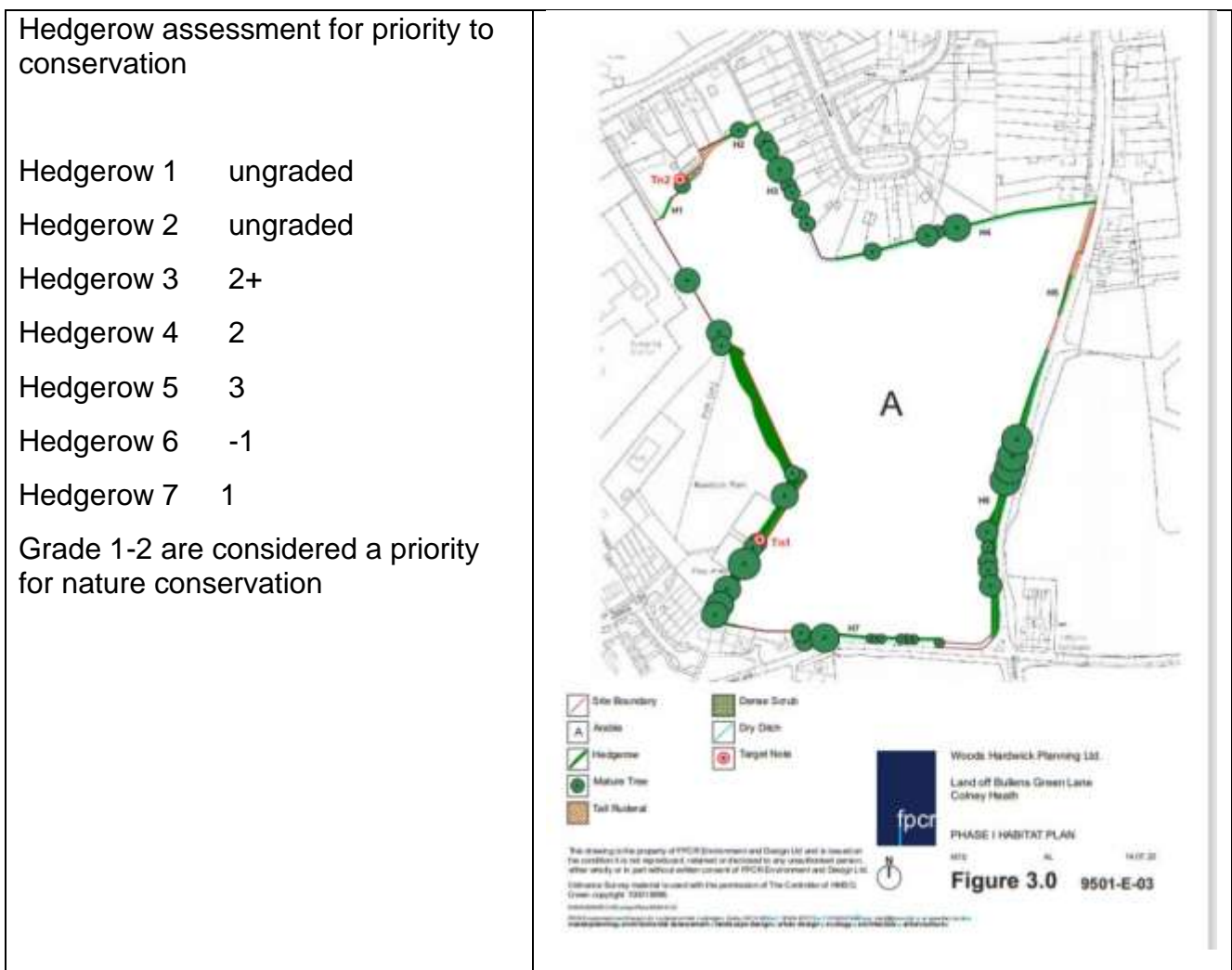
Contamination Risk

No significant issues.

Ecological Assessment

The ecological assessment found no evidence of protected species but concluded that some of the hedgerows were of benefit to nature conservation and therefore should protected.

These areas could form part of the Tree protection orders (TPOs) see 'if minded to grant'.



Flood Risk Assessment and Drainage Strategy August 2020

Flood risk zone 1 therefore the site is not at any significant risk of flooding.

Method of Surface Water Discharge Infiltration

3.39 Infiltration testing was carried out onsite by PGE for 7 trial pits in accordance with the BRE 365 methodology. The results indicate that significant infiltration was not noted within any of these trial pits.

3.40 It is therefore considered that the use of infiltration techniques such as traditional soakaways will not be suitable for surface water discharge at the proposed site. For full copies of the infiltration data and trial pit logs, see Appendix G. 3.41 It is also noted that there is an Affinity Water abstraction point immediately north west of the site, therefore infiltration is not appropriate in this area.



Map (EA) showing risk from surface flooding.

This was also noted when the Neighbourhood Plan site assessment was completed with roadside ditches full and water running across Bullen Green Lane.

A management plan is required to maintain the local ditch network to avoid localised highway and footpath flooding.

Ground investigation

No significant issues not noted elsewhere