

COLNEY HEATH PARISH COUNCIL

✉ **Address:** Highfield Park Visitor Centre, Hill End Lane AL4 0RA
☎ **Telephone:** (01727) 825 314
💻 **Website:** <https://colneyheathparishcouncil.gov.uk>
✉ **E-mail:** clerk@colneyheathparishcouncil.gov.uk



Response to St Albans District Council Planning application 5/2023/1923 LAND BETWEEN THE ALBAN WAY AND COLNEY HEATH LANE ST ALBANS HERTFORDSHIRE

1. Colney Heath Parish Council (CHPC) wishes to object to this planning application. CHPC recognises that there is a need for new homes within the district. However, it believes that these should be located on sites which are supported by good public transport links and nearby amenities. In its draft Local Plan St Albans District Council (SADC) has identified numerous sites which meet these criteria; CHPC has indicated its support for the Local Plan. The site which is the subject of the present application is not one of those identified by SADC and this forms one of the grounds for this objection.
2. There are a number of other grounds for the objection, including the following:
 - suitability of the site, particularly with regard to the extent of contamination of the land and the consequent risk to public health
 - access to the site and its implications for road safety
 - impact on wildlife on and around the site
 - lack of supporting infrastructure
 - poor sustainability of the site
3. The proposal is for the construction of up to 190 dwellings on part of a former quarry. Quarrying largely ceased 50 – 60 years ago, and the site became used primarily for landfill. Since the cessation of use of the quarry site for landfill, and with no subsequent use, unmanaged grass and shrubs have become established on the site. It now forms part of the Smallford Pits Local Wildlife Site (LWS).
4. The application site covers an area of approximately 12 hectares, most of which is scrub and grassland; there is a small area of woodland of around 1ha within the proposed site. The application proposes that about half of the site will be built over; the remainder will be public open space. The open space will include provision for play areas for younger children, but the wider areas needed by older children will be missing; Highfield Park, which is 1.3km from the site, is the nearest facility to meet this need.
5. The application site is within the Metropolitan Green Belt. The National Planning Policy Framework (NPPF) sets out five purposes of the Green Belt:
 - to check the unrestricted sprawl of large built-up areas
 - to prevent neighbouring towns merging into one another
 - to assist in safeguarding the countryside from encroachment
 - to preserve the setting and character of historic towns
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

COLNEY HEATH PARISH COUNCIL

✉ **Address:** Highfield Park Visitor Centre, Hill End Lane AL4 0RA
☎ **Telephone:** (01727) 825 314
💻 **Website:** <https://colneyheathparishcouncil.gov.uk>
✉ **E-mail:** clerk@colneyheathparishcouncil.gov.uk



6. The applicant's Landscape and Visual Appraisal and Green Belt Assessment (LVAGBA) claims that the proposal would have a limited or very limited impact on the first three of the above and no impact on the fourth; it considers the impact on the last purpose to be neutral. This is in contrast to the 2023 Green Belt Review conducted on behalf of SADC by ARUP. This review concluded that the area "performs strongly against NPPF purposes and makes an important contribution to the wider Green Belt" and that it should not be recommended for further consideration for development.
7. CHPC believes that the proposed development would provide a weak boundary for the edge of the urban area and so would increase the likelihood of further development and erosion of the Green Belt. The NPPF recommends the use robust boundaries to the Green Belt, such as roads, rivers or canals. A wire fence, as proposed in this application, is woefully short of the expectations of the NPPF in this regard.
8. CHPC also has concerns regarding the impact of the proposed development on the immediate environs of the site. The LVAGBA acknowledges that there would be adverse impacts on the neighbouring properties in both the short and long term; it is claimed that these would be moderate. CHPC believes that this understates the impact of heavy construction vehicles during the building works and also that of the many movements of residents' vehicles on completion.
9. The LVAGBA also recognises that there would be adverse impacts on nearby public rights of way (PROW) and the Alban Way; PROW Colney Heath 011 and PROW Colney Heath 039 run adjacent to the site. It is accepted that the impact on the former would be major/moderate in the short term and moderate in the longer term; in the latter case it would initially be moderate and becoming minor once the proposed planting on the site has matured. PROW Colney Heath 038 runs through agricultural land to the south of the site and will also be affected, although the likely impact is assessed as being minor or negligible. The impact on the Alban Way, which is at the northern edge of the site and is seen as an important route to and from the site, is assessed as being moderate to minor. When considered collectively the likely effects of the development on these footpaths represent a significant loss of public amenity.
10. One of the expectations of the NPPF is that land should be used efficiently. A key aspect of this relates to housing density i.e. the number of dwellings to be built in a given area of land. The present application envisages a density of 30 dwellings per hectare (dph); it would normally be expected that developments would provide a density of around 40dph. From this perspective the proposal does not represent an efficient use of the available land.
11. Although quarrying continued into, and possibly beyond, the 1960s, it is believed that the use of the quarry for landfill commenced in the mid- to late 1940s, with large amounts of building rubble being transported from London as part of the post-war rebuilding programme. Since this dumping was entirely unregulated, there is no reliable information on the full nature and range of the materials now present on the site. It is this which gives rise to the public health concerns.

COLNEY HEATH PARISH COUNCIL

✉ **Address:** Highfield Park Visitor Centre, Hill End Lane AL4 0RA
☎ **Telephone:** (01727) 825 314
💻 **Website:** <https://colneyheathparishcouncil.gov.uk>
✉ **E-mail:** clerk@colneyheathparishcouncil.gov.uk



12. The applicant's Preliminary Ground Engineering and Contamination Assessment (PGECA) recognises that the ground is contaminated with *inter alia* domestic and industrial waste, asbestos, metals and the highly carcinogenic polycyclic aromatic hydrocarbons (PAH); low concentrations of ground gas have also been found. It further reports that in 2022 waste materials found included black bin bags of domestic waste, rubber, plastic cabling, timber, plastics, construction waste, glass and other materials. This assessment further recognises that there is a "low" level of ground water contamination, with the associated risk claimed to be "moderate to low". The PGECA also refers to a recorded belief that low level radioactive waste was placed on the site, although the origins of this belief are uncertain. There does not appear to have been any investigation of levels of radioactivity in recent times; this is surely a serious omission.
13. It has long been clear that the land is contaminated and concerns regarding the implications of this have been expressed for a number of years. A number of investigations have been carried in attempts to clarify the extent of contamination and its significance. The PGECA refers to a 2004/05 investigation which found levels of ammonia, several metals, including uranium, phosphorus, PAH, pesticides and herbicides and other contaminants which exceeded guideline levels. The PGECA also refers to a 2011 report which suggested that there may be potential pollution linkages arising from contamination of the land. This report concluded that there could be a link between leachate from the land and groundwater within the deeper chalk aquifer.
14. In 2012 Affinity Water, the operators of the nearby Tyttenhanger Public Water Supply (PWS), informed the Environment Agency (EA) of increasing concentrations of ammonia and amobarbital in water. Affinity also suggested that metaldehyde could be migrating from the Smallford Tip to the Tyttenhanger PWS. Subsequent investigations, reported in 2014, identified key contaminants of concern in the leachate, namely ammonia, amobarbital and metaldehyde, and potential pollution linkages with the nearby Butterwick Brook and the chalk aquifer. The report concluded that there was insufficient evidence to conclude whether the rising levels in water were due to contamination from the site. A 2018 report, commissioned by the EA, concluded that the increasing levels of metaldehyde in the Tyttenhanger PWS were likely to be due to contamination from the Smallford site.
15. An investigation by AECOM, reported in 2018, identified these same key contaminants, and also the metals iron, manganese, and nickel, as posing a possibility of significant pollution of controlled waters. The report concluded that there was sufficient evidence that pollution of the chalk aquifer caused by the site could lead to levels exceeding drinking water standards in water at the Tyttenhanger PWS. It has clearly not been demonstrated that the risks from the proposed site are low and will not endanger the public water supply. It is known that the Bishops Rise pumping station in nearby Hatfield is already unable to supply water for public use due the need for the mitigation of another contamination source at Sandridge on the north-eastern border of St Albans. There is a real risk that approval of the present application could result in the Tyttenhanger PWS being similarly affected.

COLNEY HEATH PARISH COUNCIL

✉ **Address:** Highfield Park Visitor Centre, Hill End Lane AL4 0RA
☎ **Telephone:** (01727) 825 314
💻 **Website:** <https://colneyheathparishcouncil.gov.uk>
✉ **E-mail:** clerk@colneyheathparishcouncil.gov.uk



16. The wide acceptance of contamination of the land raises questions regarding the implications of the proposed development as a potential source of pollution. This could be of significance both during the building works, and their consequences for site workers and residents of nearby properties, and also in the longer term for residents of the completed development. With regard to the former, it is certain that disturbance of the land will create aerial pollution from volatile contaminants, some of which could be harmful, and also dust which could include asbestos fibres. It is also the case that some of the contaminating materials, particularly those from domestic waste, will be organic in nature and therefore prone to putrefaction over time. This would result in generation of not only methane and carbon dioxide but also noxious and potentially harmful gases which could be released when the ground is disturbed.
17. The application includes proposed mitigations, but also recognises that these are based on an incomplete understanding of the contaminants present and that the works may reveal unforeseen contamination and pollution issues. The principal approach to mitigation is to remove much of the waste, apply a cement covering to stabilise the surface and lay a geotextile separating membrane across the built-on area, including gardens, and rely on these to prevent migration of pollutants to future residents. This approach places great reliance on maintaining, over the long term, the structural integrity and required permeability of the material of membranes which are only a few mm in thickness. A further concern relates to the potential for the building works, and also any future developments on the site, to promote the migration of pollutants into the ground water and thus to local water courses and ultimately to the water supply. For example, Butterwick Brook feeds into the river Colne, which one of less than 200 chalk streams found worldwide, and is thus of international importance.
18. Paragraph 183 of the NPPF states that where contaminated land is proposed for development, the site must be suitable for its proposed use. Para 183(b) states that, as a minimum, the land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990. It seems unlikely that this provision could be met in this case as a membrane will be required to prevent contaminants escaping and all dwellings must be sealed to prevent the ingress of methane and other gases. These measures would need to be wholly effective throughout the life of the buildings; CHPC does not have confidence that this can be achieved.
19. It does seem perverse to remove huge quantities of waste materials from a former landfill site to a current landfill site. This would entail a very large number of movements of heavy goods vehicles, all passing through the proposed site access into Colney Heath Lane which, as shown below, are both totally unsuited to this level of HGV activity. This activity would also have major adverse consequences for current residents of the locality, particularly those living close to the site, for congestion on local roads and for the pollution generated by these vehicles.
20. CHPC believes that the risks associated with placing a residential development on this land are unacceptable. This is because the ground is known to be contaminated, with the full range of contaminants and the extent of contamination being unknown. There are known to

COLNEY HEATH PARISH COUNCIL

✉ **Address:** Highfield Park Visitor Centre, Hill End Lane AL4 0RA
☎ **Telephone:** (01727) 825 314
💻 **Website:** <https://colneyheathparishcouncil.gov.uk>
✉ **E-mail:** clerk@colneyheathparishcouncil.gov.uk



be potential pathways for pollutants to reach the water supply from the site and evidence that this has occurred. The building works, which would include the piling necessary for all the buildings, would disturb the land and pose a risk to workers and local residents alike. The mitigations proposed do not convince that they would provide full protection either in the short term or over the life of the development. These considerations lead to the conclusion that the development would place hundreds of people at risk in both the short and longer term. On these grounds alone the proposed development should be refused.

21. The application site is entirely located within the EA's Flood Zone 1 and is therefore at very low risk of flooding from rivers. However, the applicant's Flood Risk Assessment and Drainage Strategy (FRADS) states that a small part of the built-on area is at high risk of surface water flooding i.e. the likelihood of flooding is greater than 3.3% each year. Other parts of the built-on area are at medium risk, with an annual likelihood of between 1% and 3.3%.
22. The planning application for this development suggests that surface water will be removed through a combination of soakaway and installation of a sustainable drainage system (SuDS). However, the FRADS states that the former is not viable for this site due to the contamination of the land and the risk of pollutants leaching into the water supply. It is also intended to install a membrane to prevent migration of pollutants to the surface (see above); this would influence the ability of surface water to permeate the ground.
23. It is recognised that, in the inability to dispose of surface water by infiltration, and in the absence of any nearby watercourse able to receive discharged surface water, a SuDS is the most suitable option for the site. This will take the form of an attenuation basin which collects surface water gravitating from across the site; this water will then be pumped into the nearby public surface water sewers at an agreed rate. However, the removal of surface water to a public sewer cannot be considered to be sustainable. Although Thames Water has raised no objection to these proposals, they do run counter to the methods preferred by this company and also the EA.
24. Thames Water has, however, indicated that it is will be unable to accept foul water from the site without upgrades to their network. There is currently not sufficient capacity within the network to accommodate additional flows, hence there will be a need to design a solution and put in place the necessary improvements. This is likely to be a lengthy and complex process as the sewer runs directly under Colney Heath Lane, and the necessary works would cause major traffic problems due to the need for roadworks over an extended period of time. Moreover, the weight limits on the bridges in Colney Heath Lane and Smallford Lane/Station Road would present problems with regard to access for the heavy vehicles required during the works.
25. A further issue of major concern to CHPC is the proposed vehicular access arrangements to the site. There will be a single access point on Colney Heath Lane, with the access road running between the houses numbered 135 and 145, whose occupants would be subject to substantial disturbance and noise from traffic entering and leaving the site, particularly during the construction phase. The application recognises that a roundabout at this point would be

COLNEY HEATH PARISH COUNCIL

✉ **Address:** Highfield Park Visitor Centre, Hill End Lane AL4 0RA
☎ **Telephone:** (01727) 825 314
💻 **Website:** <https://colneyheathparishcouncil.gov.uk>
✉ **E-mail:** clerk@colneyheathparishcouncil.gov.uk



preferable, presumably on safety grounds, but the limitations to the available space have precluded this solution; as a consequence a bellmouth priority T-junction will be installed. The access road will be 6.75m in width, but if agreement cannot be reached for a bus service to enter the site this will be reduced to 5.5m. This road will have a 2m verge and a 3m footway on each side.

26. The concerns about the access are based primarily around the junction with Colney Heath Lane. This is a narrow carriageway which is busy throughout the day and especially at peak hours. At this point in the roadway there is a pedestrian footway on one side only, this being the eastern side where the site access will be. Nicholas Breakspear School, a secondary school with over 1000 students, is located 500m from the proposed access; children walking to school from the south would be required to cross the proposed junction during the morning peak hours, with clear implications for their safety. Many parents use the road to transport their children to and from school, increasing traffic volumes in the morning and mid-afternoon periods. School traffic also leads to parking problems during those periods, resulting in a narrowing of usable road width and increasing the potential for accidents. In addition, some students may cycle to school and would be required to use this road as there is no alternative route.
27. The proposed junction is situated on a bend in the road, hence visibility for drivers leaving the access road would be less than optimal. The speed limit at that point is 30mph, but is frequently exceeded, particularly as traffic travelling northwards would have just left a 40mph zone. The application includes no evidence on traffic speeds; however, a recent planning application relating to Boissy Close, which is 305m from the application site, is in the 30mph zone, and also includes a junction with Colney Heath Lane, provided relevant information. This suggests that, considering traffic flows in both directions, an average speed of 40.3mph is observed i.e. more than 10mph above the speed limit at that point.
28. These observations suggest that Colney Heath Lane is a road with a significant potential for accidents. Appendix 1 contains Crashmap data for this road and also two comparable roads in the vicinity; these are Smallford Lane and Hill End Lane. These data show clearly that there have been more accidents in Colney Heath Lane than the other roads, suggesting that historically there is a greater risk on this road. The introduction of the proposed site junction could only exacerbate this situation. Furthermore, the increased volumes of traffic arriving at the junction with the A414 would add to the existing major problems of over-capacity and accident risk at this point.
29. As indicated above, the application site is part of the Smallford Pits Local Wildlife Site. The applicant's Ecological Impact Assessment (EIA) recognises that there is a great diversity of wildlife on and around the site and that the proposed development will cause harm, particularly to animal life. The site has already been the subject of ecological vandalism, with several ponds having been contaminated with diesel in an attempt to destroy the wildlife dependent on them. Police have been informed but have been unable to take action due to a lack of evidence regarding the perpetrators.

COLNEY HEATH PARISH COUNCIL

✉ **Address:** Highfield Park Visitor Centre, Hill End Lane AL4 0RA
☎ **Telephone:** (01727) 825 314
💻 **Website:** <https://colneyheathparishcouncil.gov.uk>
✉ **E-mail:** clerk@colneyheathparishcouncil.gov.uk



30. Among the animals present in and around the site are great crested newts (GCN), a European protected species; this was confirmed by the survey undertaken as part of the EIA. Also present are bats, all species of which, together with their roosts, are legally protected in the UK. The EIA reports surveys which found 11 species of bats on and in the vicinity of the site; trees with the potential to support roosting bats were reported to be present on the site. Other species include grass snakes, adders, multiple other newt species, insects, voles, stoats, rabbits, dormice, badgers, hedgehogs, foxes and muntjac deer. The LWS is home to one of the widest ranges of dragon and damselflies in the county. The populations of butterflies and moths, some of which are rare species, supported by the land and woodland have grown and now contribute significantly to the Hertfordshire count. Local residents report that many of these species have migrated into their gardens and add to their enjoyment of their immediate environment.
31. The woodland on the site also includes a wide diversity of trees which themselves support the bird population. In the current year at least two pairs of red kites, a protected species, have nested on the site; other nesting raptors include buzzards and sparrowhawks. Skylarks and linnets, both of which are on the UK Red List for conservation, are also found on the site. These birds, together with many other animals, use the land to feed and as a source of water, as do many migrating birds.
32. The applicant's EIA identified a high degree of wildlife activity along the proposed access road. CHPC believes that this route acts as a corridor to the wider populations, enabling them to migrate between the site and nearby open areas. This ability to move across the land is required to maintain healthy and genetically diverse populations and could be seriously compromised by the installation of the proposed road. It is also the case that under these proposals the main built-on area of the site is that identified in the EIA as being the area with the highest levels of wildlife activity. This reflects the poor layout of the site and the limited consideration given to wildlife in these proposals.
33. CHPC notes that the Consultation Response – Arboriculture, submitted by the SADC Tree Officer, suggests that the site is “generally devoid of any trees of significance”. This conclusion appears to be based entirely on a review of the applicant's Arboricultural Assessment. This latter document, however, was not informed by the PGECA and was therefore unable to consider the likely impact of works required to mitigate the serious contamination issues, including the risks to the Root Protection Zone of some A-rated trees, including a veteran tree, in the woodland to the rear of 113 – 135 Colney Heath Lane. This woodland is the subject of a Tree Preservation Order, hence the impact of works on the site must be given consideration.
34. The EIA indicates that the approach to mitigation of the harm caused by the development will include on-site remediation and enhancement. However, it is recognised that there will be a net loss of habitat units, thus necessitating off-site compensation, leading to an overall net gain in biodiversity. The EIA does not specify how this will be achieved other than through statements about possible compensation on “bespoke habitats elsewhere within the district” or contributions to a habitat bank.

COLNEY HEATH PARISH COUNCIL

✉ **Address:** Highfield Park Visitor Centre, Hill End Lane AL4 0RA
☎ **Telephone:** (01727) 825 314
💻 **Website:** <https://colneyheathparishcouncil.gov.uk>
✉ **E-mail:** clerk@colneyheathparishcouncil.gov.uk



35. CHPC is concerned that the extent of harm to the wildlife on and around the site, both during the building works and subsequently, will be substantial. It believes that there is a real risk that the disruption to the food and water sources, and hence the breeding, of many species, some of which are endangered, will result in their failure to re-establish on the site. This would be significantly to the detriment of current and future residents and to the wider environment. Furthermore, CHPC is not convinced by the vague statements regarding mitigation and believes that the overall impact on the LWS would be unacceptable.
36. The NPPF states clearly that priority should be given to approval of proposals for development in sustainable locations i.e. those with good public transport links and good facilities for walking and cycling. Such locations promote the use of public and active transport with the aim of reducing reliance on private cars. CHPC does not believe that the present application is in accordance with these principles.
37. The only mode of public transport available in the locality of the site is the local bus service. The applicant's Transport Assessment lists 12 "available" bus routes but fails to mention that none of these provides a service that would be both nearby and useful to residents of the proposed development. This is because the only buses which travel along Colney Heath Lane are primarily serving Nicholas Breakspear School and operate only on schooldays. As school buses they offer a single service in both mornings and afternoons; details of these services are in Appendix 2. They do connect Colney Heath Lane with Hatfield, Welwyn Garden City, Borehamwood and Enfield, but in each case the only bus to deliver passengers to these destinations is in mid-afternoon, a time which is unlikely to be convenient for most users; there would be no suitable return journey before the next morning. Neither of the two bus stops which are reasonably close to the site has a shelter.
38. Other bus routes, with a more useful range of destinations, including St Albans, and with regular services throughout the day, are available in the locality but are not within easy walking distance. All run along Hatfield Road, which is to the north of the application site. The nearest bus stops on this road are all at least a 20 minute walk from the site and thus beyond what is considered by the Chartered Institute of Highways and Transportation to be a reasonable walking distance. None of the bus stops on Hatfield Road which are nearest to the site has a shelter. The applicant has consulted two bus operators to investigate the possibility of a service directly to the site; one has rejected the proposal and a response from the other was yet to be received.
39. It can be seen from the above that existing bus services will by no means meet the requirements of residents of the site. The bus stops which are within reasonable walking distance do not offer regular or useful services to the general public, and the bus stops which do offer such services are distant from the site. It is inevitable that site residents would be very largely dependent on their cars for nearly all journeys. The applicant proposes 270 parking spaces for the 190 dwellings, an implicit recognition that residents would be car-dependent.

COLNEY HEATH PARISH COUNCIL

✉ **Address:** Highfield Park Visitor Centre, Hill End Lane AL4 0RA
☎ **Telephone:** (01727) 825 314
💻 **Website:** <https://colneyheathparishcouncil.gov.uk>
✉ **E-mail:** clerk@colneyheathparishcouncil.gov.uk



40. The nearest railway station is St Albans City, which is 3.5km from the proposed site. Other stations within the wider locality are St Albans Abbey, Welham Green and Hatfield, which are at distances of 5km, 6km and 6.8km respectively i.e. well beyond normal walking distances. Other than the single mid-afternoon school services, there is no bus service from close to the site to any of these stations. St Albans City and Hatfield stations are served by buses on Hatfield Road but, as shown above, these routes are not within reasonable walking distances.
41. In addition to public transport the NPPF indicates that sites with priority for approval should be within distances of essential amenities which can be reached by walking and cycling; moreover, the routes to be used should be safe for use by the general public. Colney Heath Lane, onto which the site access road leads, is narrow and busy with a history of traffic accidents. There is a pedestrian footway on one side only, and this is narrow in places. Access on foot to Hatfield Road requires walking over the bridge above the Alban Way; the footpath on the bridge is particularly narrow. It is heavily used by Nicholas Breakspear students at certain times of the day, often making difficult any movement in the direction opposite to the main flow and occasionally necessitating stepping into the roadway in order to pass.
42. CHPC has conducted assessments of possible walking and cycling routes in the vicinity of the site and has concluded that none meets acceptable standards. The cycling route assessments were carried out by a local resident with extensive direct experience of transport and traffic issues. The reference used was LTN 1/20, a Department of Transport set of guidelines for the design of high quality cycling infrastructure. The full details of the methodology used and the results can be found at: <https://www.stalbans.gov.uk/sites/default/files/documents/publications/planning-building-control/Tollgate%20Road%20Inquiry/Proofs%20of%20evidence/LPA/Rule%206%20party/20230822-CHPC%20CD%209.17%20cycle%20routes%20assessment%20v1.pdf>.
- Cyclists leaving the application site must enter onto either Colney Heath Lane or the Alban Way, but neither route meets the requirements of LTN 1/20. In the former case safety is a key concern due to the narrowness of the road and high volumes of traffic. The Alban way is a dedicated walking and cycling route and is thus free of motor traffic; however, it is unlit and therefore unsuitable for use during periods of darkness.
43. The Alban Way can be used as a cycle route to St Albans City station but is hazardous in the winter months due to a lack of lighting. This route can also be used to reach Hatfield station, but the lighting issue still pertains; moreover, part of this journey requires some on-road travel. There is no safe and coherent cycle route from the site to Welham Green station.
44. As is the case with cycling, walking routes from the site are largely restricted to Colney Heath Lane and the Alban Way, neither of which is wholly suitable for the reasons indicated above. There are public footpaths close to the site, but these are more likely to be used for leisure purposes than journeys to work or to access amenities. As with the Alban Way, the lack of lighting is a likely deterrent to walkers during the winter months.

COLNEY HEATH PARISH COUNCIL

✉ **Address:** Highfield Park Visitor Centre, Hill End Lane AL4 0RA
☎ **Telephone:** (01727) 825 314
💻 **Website:** <https://colneyheathparishcouncil.gov.uk>
✉ **E-mail:** clerk@colneyheathparishcouncil.gov.uk



45. CHPC has also carried out assessments of the suitability of local footways; in this case the reference used was the Welsh Government's Active Travel assessment scheme. The results showed that none of the footways met an acceptable standard. There were a number of possible reasons for failure, principally narrowness, overgrowing vegetation and poor surface quality which represented a trip hazard. The full details of this survey can be found at: <https://www.stalbans.gov.uk/sites/default/files/documents/publications/planning-building-ccontrol/Tollgate%20Road%20Inquiry/Proofs%20of%20evidence/LPA/Rule%206%20party/20230822-CHPC%20CD%209.18-Walking%20Routes%20Assessments-v1.pdf>.
46. Of particular relevance to the present application is the assessment of the walking routes from the application site to the bus stops on Hatfield Road, details of which are in Appendix 3. These assessments show that none of the possible routes is of an acceptable standard. It is also the case that the entire pavement along Colney Heath Lane is of an unacceptable standard, with several critically dangerous zones. As indicated above, the pavement on the bridge over the Alban Way is particularly narrow, as is the roadway at that point. Beyond the houses and close to the point where the speed limit changes from 30mph to 40mph the pavement on the eastern side terminates and it is necessary for pedestrians to cross this busy road to the start of a pavement on the western side. This is dangerous as cars are frequently travelling at well above the speed limit. There is also a section from the end of the 30mph limit to Barley Mow Lane where both the pavement and the road are very narrow and vehicles can on occasion be seen on the pavement at this point.
47. It has been shown above that in order to access useful bus services it would be necessary for residents to walk along Colney Heath Lane to Hatfield Road. In addition to the distances involved, which would themselves be a deterrent to many, the walk requires use of pavements and a roadway which present a real safety risk. It seems highly likely that most residents would prefer to use their cars as being safer and more convenient.
48. Considering transport issues as a whole, CHPC does not believe that the proposed site is a sustainable location. Due to poor infrastructure, walking and cycling routes are not suitable for most purposes, with safety concerns prominent. Bus services close to the site are neither regular nor useful in terms of available destinations. Access to services which meet these criteria requires walking beyond reasonable distances to reach bus stops which have no shelters; these problems do not encourage the use of buses. Unless a bus service operator agrees to provide a major change to a route in order to incorporate the site – an unlikely prospect – it is difficult to see how this situation can be improved. As a result site residents would use private cars for most journeys, thereby adding to already acute congestion and pollution problems.
49. A further issue with regard to the location of the site is the lack of nearby services and amenities. There are no shops within easy walking distance, and the nearest shops are convenience stores which do not stock a full range of necessities; all are beyond the desirable walking distance of 400m. The nearest supermarket is Morrisons on Hatfield Road, but this is at a distance of 3km; there is no bus from close to the site to this or any other supermarket. A visit to a supermarket by bus would require a walk of at least 20 minutes in each direction, with a likely need to carry heavy shopping on the return journey; this is a wholly unreasonable

COLNEY HEATH PARISH COUNCIL

✉ **Address:** Highfield Park Visitor Centre, Hill End Lane AL4 0RA
☎ **Telephone:** (01727) 825 314
💻 **Website:** <https://colneyheathparishcouncil.gov.uk>
✉ **E-mail:** clerk@colneyheathparishcouncil.gov.uk



expectation. Other essential services, such as medical facilities, dentists etc. are similarly affected. It is highly likely that residents would choose to make such journeys by car.

50. Journeys to local schools are also likely to be undertaken by car. The only school within easy walking distance is Nicholas Breakspear School on Colney Heath Lane. However, as a Catholic secondary school it is not open to younger children, and its admissions policy precludes entry to most children on grounds of religion. There are a number of other secondary schools in and around St Albans and Hatfield, but many are, or are very nearly, already oversubscribed; Appendix 4 includes 2023 data on applications and admissions to local schools. Nearly all these schools would require journeys by bus, with the associated long walks to bus stops, or by cycle. The Alban Way could be used for part of some cycle journeys, but this route does have child safety concerns; moreover, the remaining parts would mostly be on busy roads which place cyclists at risk.
51. All local primary schools are beyond an acceptable walking distance; the nearest is Colney Heath School and Nursery, which is 1.8km from the site. It would not be expected that children of primary school age would either travel by bus unaccompanied or cycle on the busy local roads even if accompanied by a parent. As with journeys to secondary schools, many parents drive their children to school and it is highly likely that this would be the means of travel for most children living on the application site.
52. CHPC believes that this site is not in a sustainable location which encourages the use of public transport or the active transport modes of walking and cycling. Bus services close to the site are of little use to the general public, and more useful and regular services are beyond acceptable walking distances. These latter services do provide access to railway stations which are accessible by bus, but long walks to reach the bus stops are required. Access to stations by cycle is feasible, but requires journeys along an unlit cycle path or on busy roads. Shops, schools and other essential services are beyond reasonable walking distances and not easily accessed by bus. It is clear that residents of the application site would be heavily dependent on cars for most journeys. This is contrary to the intentions of the NPPF, is harmful to the environment, and will exacerbate existing traffic problems.
53. In summary, CHPC believes that the proposal is not appropriate. The land is in the Green Belt which would be harmed by the development, as would the extensive wildlife on and around the site. The site has not been identified as appropriate for development by SADC in its draft Local Plan. The land is known to be heavily contaminated, with potential health risks for future residents; the mitigations proposed are not wholly convincing. There are safety concerns with regard to the proposed site access and its impact on local residents. The site is not in a sustainable location and necessary amenities are lacking. The very special circumstances required for approval have not been demonstrated.
54. CHPC urges SADC to refuse this application.

COLNEY HEATH PARISH COUNCIL
3RD DECEMBER 2023