

Document No. STRIFE/01

APP/B1930/A/07/2045747/NWF  
Town and Country Planning Act 1990

**Appeal by Helioslough Ltd**  
**Site at land in and around Former Aerodrome,**  
**North Orbital Road,**  
**Upper Colne Valley,**  
**Hertfordshire**

**Proof of evidence on behalf of**  
**STRiFE (Stop the Rail Freight Exchange)**

**Green Belt**

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16 October 2007

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## **1. INTRODUCTION**

### **1.1 Personal details**

1.1.1 My name is Adrian Wallace and I appear at this public Inquiry on behalf of Stop the Rail Freight Exchange (STRiFE). I have been helped in the preparation of this proof of evidence by colleagues within STRiFE.

### **1.2 Qualifications and experience**

1.2.1 I am a solicitor and specialise in commercial property work. I am not an expert in planning law or any other technical matters relevant to this inquiry. I appear as a local resident and as a member of STRiFE.

### **1.3 STRiFE**

1.3.1 STRiFE, is a local community group, set up to represent local residents on the appellant's proposals to develop a Strategic Rail Freight Interchange on the site of the former Radlett Aerodrome. We are here to articulate the views of the local community.

1.3.2 STRiFE has members from a wide variety of locations near to the subject site and in areas likely to be affected directly by the appellant's development proposals. Membership is drawn from settlements such as Park Street, Frogmore, Colney Street, Radlett, St Albans, Napsbury, London Colney, Bricket Wood and Chiswell Green. STRiFE's members are from a variety of professions, religions and backgrounds.

1.3.3 We are not trespassing on the professionals' territory, simply offering a local perspective. STRiFE cannot cover all the objections ourselves, however, where we are silent, this does not mean that we do not care! We fully endorse the LPA. We are speaking from personal experiences on the impacts that this proposal would have on local residents.

## 2. SCOPE OF EVIDENCE

### 2.1 Core evidence

- 2.1.1 STRiFE made a number of concerns related to Green Belt and other matters in it's response to the City and District Council in October 2006. That evidence is superseded by this submission.
- 2.1.2 This paper focuses on the local Green Belt and the likely impact if this proposal goes ahead. It briefly looks at some of the key policies but **not** from the view of a planning expert. Rather I am one of the numerous STRiFE members who has taken the trouble to learn up about the development system to help prepare evidence for this Inquiry.
- 2.1.3 This evidence uses a substantial amount of my own experience of using and enjoying the local Green Belt. However, as I make clear later in this report, my enjoyment of the local countryside demonstrated in the paper is typical of many people. Indeed, protecting the local environment has been found to be a key priority in local surveys <sup>1,2</sup>.

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1. St Albans City and District Council, 2005, 2005 MORI poll, pages 5 and 6 ([Appendix STRIFE 01/02](#))

2. St Albans City and District Council, 2006, Joint Issues and Options Consultation for the St Albans Local Development Framework ([Appendix STRIFE 01/03](#))

### **3. GREEN BELT IN THE LOCAL ENVIRONMENT**

#### **3.1. Background and Introduction**

- 3.1.1 I live at Toll Cottage, Burydell Lane, Park Street, St Albans. This property lies at the eastern end of Burydell Lane at which point the road ends. A bridleway (“the bridleway”) continues eastwards and then northeastwards towards Hedges Farm and to the A414 and a footpath (“the footpath”) continues initially northwestwards and through Hedges Farm and then to Sopwell and St Albans and beyond. The footpath is part of the Ver-Colne Valley Walk.
- 3.1.2 Toll Cottage is Tudor in origin and is a grade II listed building. Although the house itself sits in the valley, higher points of the property provide magnificent views across unspoiled countryside to the north and northwest. The property is surrounded by farm land (Hedges Farm) to the north and east and allotments to the west. In the fields immediately adjacent to the property large numbers of sheep and cows graze and many horses also graze in the fields 200 metres up the bridleway.
- 3.1.3 I have lived at Toll Cottage with my wife and our daughter (born January 2005) since March 2005. Shortly after my wife became pregnant in April 2004 we decided to move out of Central London. We decided to move to a more rural location as we did not wish our child to be brought up in the centre of the city and we sought a quieter and cleaner environment.
- 3.1.4 Toll Cottage met all the criteria we set and more. In particular, the absence of traffic noise, as Burydell Lane is a no through road, the immediate access to the countryside via the footpath and the bridleway and the countryside feeling provided by being surrounded on almost all sides by fields of agriculture and the good air quality even though the property is less than a mile from the M25. On clear nights the sky is quite dark and far more stars are visible than in town; and outside even on week days the garden is exceptionally peaceful and quiet and there is no noise at all at night.
- 3.1.5 I enjoy jogging and walking and take every opportunity I can to enjoy the immediate access to the countryside provided by the house. What is particularly important to me is the unspoiled natural farm land. My daughter loves the farm animals which are found so close to home and her greatest joy is to be taken to see the horses at Hedges Farm, which she pleads for my wife and I do at all times and in all weathers! The pleasures of the countryside so close to my house is something I enjoy with countless other joggers and walkers. The footpath is particularly well used as it forms part of the well known Ver-Colne Valley Walk and hikers are to

be seen enjoying it everyday. From the raised elevation of the bridleway as it crosses Hedges Farm there are magnificent country views towards St Albans. In particular, there are excellent views of the Cathedral from several places from the bridleway. There are also good views on towards Napsbury across the restored former Aerodrome. The bridleway is also well used by walkers, joggers and of course horse riders for recreation and quiet enjoyment. It is also used as a means of pedestrian access from Cottonmill and St Julians to Park Street.

- 3.1.6 From the train (Thameslink) the open aspect of the countryside is immediately apparent on leaving Radlett towards St Albans and there are magnificent views across open countryside throughout the greater part of the journey. From the train it is also possible to enjoy views of St Albans and in particular the Cathedral.
- 3.1.7 Photos of the various views referred to above in this section are attached as Appendix 1.

## **4 THE PROPOSAL AND LIKELY IMPACT IF IT GOES AHEAD**

### **4.1 The Proposal**

4.1.1 The applicant's proposal involves the construction of five huge distribution warehouses 20 metres high which together with associated road rail and other infrastructure works would create a massive industrial complex covering virtually the whole of the area described as above, and comprises some 172 hectares of land within the Green Belt. The proposal includes works within areas 3 to 8 to provide public open space and community forest.

### **4.2 The Country Park**

4.2.1 I am including in this paper a number of photos demonstrating my experience of accessing the countryside as a jogger and informal rambler, getting my exercise and fresh air around Park Street and this proposed distribution park site.

4.2.2 The photos prove that what we have at present is an environment where people can live and work with good access to the countryside. Therefore we do not need a country park. In fact, the whole idea of a country park proposal is absurd:

- It is designed to facilitate access to the countryside, but we already have access to many country areas as I have just shown in the photos;
- A country park (to promote access to the countryside) with a massive industrial complex in the middle (where there would be no access) appears contradictory;
- There are country parks nearby already, such as at Aldenham;
- Country parks generally rely on public subsidy to keep open so, after the initial developer funding, Council tax payers will be expected to pay money to pay for the park we do not want or need;
- From an estate management point of view it would be problematic have a country park of six separate sites.

### **4.3. Impact of the Applicant's Proposals on Green Belt**

- 4.3.1 The applicant's proposal involves the sacrifice of 172 hectares of the metropolitan Green Belt to inappropriate development. Not only will this permanently remove a very significant parcel of land from the Green Belt in terms of the quantity of land taken, but also in terms of its quality – the affected land being one of the last significant areas of Green Belt which separate St Albans to the north, London Colney to the West, Radlett to the south and Park Street/Frogmore to the east, so that these areas would effectively merge as a result of this proposal.
- 4.3.2 If some areas of Green Belt are more important than others because they are the last barrier preventing urban coalescence in a particular area, then this is certainly one of the best examples. Its removal would permanently join St Albans to Radlett and outer London.
- 4.3.3 The large area of Green Belt which lies between St Albans, London, Park Street and Radlett (Hedges Farm and the former Radlett Aerodrome) is a much loved and prized jewel in a shrinking crown of Green Belt in the vicinity. More precious, perhaps, because it is the only area of Green Belt between what are essentially four separate communities.
- 4.3.4 Moreover, in the light of the above, the proposal would directly contravene two of the purposes of Green Belts - namely to prevent the merging of neighbouring towns and to assist the safeguarding the countryside from encroachment.
- 4.3.5 In addition, there is no doubt that proposals would produce other significant detrimental effects on the local Green Belt: -
- (a) Hedges Farm would disappear. Not only is this directly contrary to a defined Green Belt objective (to retain land in agriculture), its loss in local terms is incalculable. The disappearance of the farm, and its animals - so much a part of the local culture - would be devastating to the local community and to all those who enjoy our countryside. Moreover, the developer's proposal to replace the farm with a country park and represent this as a benefit to the community is misleading and offers the community absolutely no consolation. The public already has access to this open space To take away that treasured amenity and replace it with something less authentic is hard to measure as any form of benefit.

- (b) The views of open countryside would be diminished or in some cases eliminated. In particular, the important view of the Cathedral from the main Thameslink line would disappear forever as a result of the bunding of the site. Views from Park Street to Napsbury would also be interrupted by the rail freight terminal. Although this would be bunded, it would nevertheless interrupt views from elevated areas. Again, enjoyment of the views of St Albans would be interrupted either by the facility or by the proximity to infrastructure from the facility.
- (c) One of the express purposes of including land in Green Belts is to “preserve the setting and special character of historic towns”<sup>3</sup>. St Albans is one of the most important historic towns in England, and views of and from it are extremely important. Furthermore, the association with St Albans also merits preservation. It is difficult to see how building a huge industrial facility so close to a historic town can do anything other than harm its association and reputation.
- (d) The large number of people who currently use the countryside would simply not want to walk, jog, cycle or ride in the shadows of a major industrial complex with all the consequent noise (both constant background noise and peaks) and air pollution.

4.3.6 The proposal would therefore be in conflict with every objective of established Green Belts stated above and seemingly offer nothing to the local community in return.

4.3.7 Even taking on board the general desire in the local community to see routes improved and added to in the area, it would be simply impossible for the developer to offer enough compensatory measures in these regards to offset the massively detrimental impacts of the development.

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3 Department for Communities and Local Government, Planning Policy Guidance Note 2: Green Belts (1995, amended 2001), paragraph 1.5, page 5



## 5 PLANNING POLICIES RELATED TO THIS APPLICATION

### 5.1 National Planning Guidance

5.1.1 Planning Policy Statement 1<sup>4</sup> (Delivering Sustainable Development) lists at the start of the document four central objectives of the national planning system, the first of which is repeated below with my own emphasis in italics.

“Planning shapes the places where people live and work and the country we live in. Good planning ensures that we get the right development, in the right place and at the right time. It makes a positive difference to people's lives and helps to deliver homes, jobs, and better opportunities for all, ***whilst protecting and enhancing the natural and historic environment, and conserving the countryside and open spaces that are vital resources for everyone.*** But poor planning can result in a legacy for current and future generations of run-down town centres, unsafe and dilapidated housing, crime and disorder, ***and the loss of our finest countryside to development***”.

5.1.2 The third of the Government's central objectives for the planning system meanwhile notes the importance that should be placed on quality of life issues in the planning system<sup>(5)</sup>. It states that:

“Sustainable development is the core principle underpinning planning. At the heart of sustainable development is the simple idea of ensuring a better quality of life for everyone, now and for future generations...”.

5.1.3 Clearly, this application is fundamentally at odds with these central planks of the planning system.

5.1.4 National planning policy guidance on Green Belts meanwhile is contained in Planning Policy Guidance Note 2 (PPG2) which provides that *“the fundamental aim of Green Belts is to prevent urban sprawl by keeping land permanently open: The most important attribute of Green Belts is their openness”*<sup>(6)</sup>.

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4. Department for Communities and Local Government, (1999) Planning Policy Statement 1: Delivering Sustainable Development

5. Same source, paragraph

6. Department for Communities and Local Government, Planning Policy Guidance Note 2: Green Belts (1995, amended 2001) Paragraph 1.4, page 5

5.1.5 The purposes of including the land in Green Belts are stated as <sup>(7)</sup>:

- To check the unrestricted sprawl of large built up areas;
- To prevent neighbourhoods from merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns;
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

5.1.6 This proposal appears to conflict with **all five** of the above objectives.

5.1.7 PPG2 also notes<sup>(8)</sup> that, once Green Belts have been defined, the use of land in them have a positive role to play in fulfilling the following objectives:

- To provide opportunities for access to the open countryside for the urban populations;
- To provide opportunities for outdoors sport and outdoor recreation near urban areas;
- To retain attractive landscapes and enhance landscapes near to where people live;
- To improve damaged and derelict land around towns;
- To secure nature conservation interest; and
- To retain land in agriculture, forestry and related uses.

5.1.8 PPG2 also notes that *“The purpose of including land in Green Belts are of paramount importance to their continued protection and should take precedence over other land uses”* <sup>(9)</sup>.

5.1.9 The permanence of green belt is emphasized in the guidance:

*“The essential characteristics of Green Belts is their permanence. Their protection must be maintained as far as can be seen ahead”* <sup>(10)</sup>.....  
*“Green Belt boundaries should be altered only exceptionally and the Secretary of State will wish to be satisfied that the authority has considered opportunities for development within urban areas”* <sup>(11)</sup> .

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7 Department for Communities and Local Government, Planning Policy Guidance Note 2: Green Belts (1995, amended 2001), paragraph 1.5 page 5  
8 Same source, paragraph 1.7, page 6  
9 Same source, paragraph 1.7 page 6  
10 Same source, paragraph 2.1 page 7  
11 Same source, Paragraph 2.6, page 7

5.1.10 The guidance also points out that within Green Belts there is a presumption against inappropriate development (i.e. which is, of itself, harmful to the Green Belt). “*Very special circumstances*” are therefore required to justify inappropriate development <sup>(12)</sup> .

## 5.2 Regional Planning Guidance

5.2.1 Aside from the national policy basis noted above, the issue of Green Belts has also been covered in the preparation of the East of England Plan. The "Secretary of State's Proposed Changes to the Draft Revision to the Regional Spatial Strategy for the East of England and Statement of Reasons" <sup>(13)</sup>, has reiterated the general need to maintain broad areas of Green Belt in the East of England, whilst noting (inter alia) the Green Belt reviews required for growth at Hemel Hempstead and Welwyn Garden City/Hatfield.

5.2.2 I note, however, that the issue is covered more specifically in the policies for the London Arc <sup>(14)</sup> which starts with a bullet point that stresses that within the London Arc Sub-Region the emphasis will be on:

- retention of long-standing Green Belt restraint, supported by more positive "green infrastructure" use of neglected areas in accordance with Green belt purposes, and;
- urban regeneration, including the promotion of greater sustainability within the built-up areas, particularly measures to increase the use of non-car modes of transport.

5.2.3 Clearly this proposal is totally at odds with this guidance for the Green Belt in the London Arc.

5.2.4 Moreover, the area that we are talking about is not just Green Belt, but also an important part of the Watling Chase Community Forest (WCCF) - an area of small towns, villages, woodlands, fields and hedgerows where the emphasis is very much on protecting the environment and enhancing sustainable access to the countryside.

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12 Department for Communities and Local Government, Planning Policy Guidance Note 2: Green Belts (1995, amended 2001), paragraphs 3.1 and 3.2, page 10

13 Go-East, 2006, The "Secretary of State's Proposed Changes to the Draft Revision to the Regional Spatial Strategy for the East of England and Statement of Reasons", Policy SS7, page 93) (Core Document CD/5.3)

14 Same source, Policy LA1, page 213

5.2.5 The importance of the WCCF has been reflected in the preparation of the East of England Plan, in particular in three main regards:

- (1) As "*an area of landscape, ecological and recreational importance*" and therefore included in Policy ENV1 as "*an asset of particular regional significance for the retention, provision and enhancement of green infrastructure*" <sup>(15)</sup>;
- (2) As a location where "*urban fringe management*" has been successful and where this initiative "*should be continued and extended*" <sup>(16)</sup> ;
- (3) As one of the areas meriting substantial additional woodland planting with the aim of increasing woodland cover by 30% by 2030 <sup>(17)</sup>.

5.2.6 Clearly, urbanising a major area of countryside by building a vast distribution centre contrasts starkly with the above criteria and the regional importance of the WCCF.

### 5.3 Hertfordshire Planning Guidance

5.3.1 I am aware that the East of England Plan has not yet been adopted and so I believe the adopted Hertfordshire Structure Plan might still have some relevance in this transitional period.

5.3.2 Policy 5 of the adopted Structure Plan for Hertfordshire<sup>(18)</sup> supports the need to maintain a Green Belt in the south of the county as part of a Green Belt about 12-15 miles deep around London.

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15 Go-East, 2006, The Secretary of State's Proposed Changes to the Draft Revision to the Regional Spatial Strategy for the East of England and Statement of Reasons, pages 153 and 154) ([Core Document CD/5.3](#))

16 Same source, paragraph 3.38, page 97;

17 Same source, policy ENV5, page 160/1;

18 Hertfordshire County Council, 1998, Hertfordshire Structure Plan 1991-2011 ([Core Doc CD/5.7](#))

5.3.3 Policy 5 of the Structure Plan also includes a number of criteria <sup>(19)</sup> :

- (1) Provide opportunities for access to the open countryside for the urban population;
- (2) Provide opportunities for outdoor sport, and outdoor recreation near urban areas;
- (3) Retain attractive landscapes, and enhance landscapes near to where people live;
- (4) Improve damaged and derelict land;
- (5) Secure the nature conservation interest,
- (6) Retain land in agriculture, forestry and related uses, and
- (7) Support the objectives of the Watling Chase Community Forest

5.3.4 Clearly this application contrasts very strongly with the above criteria, just as it did with the criteria in the emerging East of England Plan.

## 5.4 Local Planning Guidance

5.4.1 With regard to local planning policies, I am aware that there have recently been changes to the development plan system, with local planning authorities saving certain of their Local Plan policies whilst they finalise their Local Development Frameworks. In this transitional period, it is possible that some of the policies in the adopted Local Plan referred to below (St Albans District Plan Review, adopted in November 1994) <sup>(20)</sup> might not have been saved. However, all were current policies though when the application was submitted and are therefore worth noting:

5.4.2 Policy 1 (Metropolitan Green Belt): Within the Green Belt planning permission will not be given for inappropriate purposes except for the development in the main built up areas or in very special circumstances.

5.4.3 Policy 105 (Landscape Development Area): The Council will promote and seek to secure landscape creation improvement and enhancement throughout the Green Belt countryside.

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19 Hertfordshire County Council, 1998, Hertfordshire Structure Plan 1991-2011 (Core Document CD/5.7)

20 St Albans City and District Council, 1994, St Albans District Plan Review (Core Document CD/5.15)

- 5.4.4 Policy 143 (Land uses for the Upper Colne Valley): In order to provide for visual and ecological improvement of the Upper Colne Valley to accommodate pressures for leisured development and to promote the enjoyment of the countryside, the Council will encourage on the former Radlett Aerodrome low and medium intensity leisure uses including water sports together with extensive landscaping.
- 5.4.5 Policy 143 A (Watling Chase Community Forest): The Council will support the establishment of Watling Chase Community Forest in the southern part of the borough. Proposals should be consistent with Green Belt policy (Policy 1) and other appropriate policies in the plan.

## 6. GREEN BELT AND PUBLIC OPINION

- 6.1.1 The concerns that I have expressed about the local environment in this paper are extremely common throughout the local area. Indeed I am aware that the 2005 MORI poll of the district<sup>(21)</sup>, using a representative sample from the local community, found that safeguarding the environment is a key priority for local people and one that the Council and it's partners should focus on to improve local residents' quality of life.
- 6.1.2 After analysing public feedback and the substantial traffic and environmental concerns expressed by local people, the latest Community Strategy<sup>(22)</sup> reiterates the priority that needs to be placed on safeguarding the local environment.
- 6.1.3 Another survey, the May 2006 Joint Issues and Options Consultation for the St Albans Local Development Framework<sup>(23)</sup>, showed that maintaining the Green Belt around St Albans is regarded by local residents should be a planning priority for the Council.
- 6.1.4 The Local Government Act 2000<sup>(24)</sup> emphasised the need for authorities to try and meet assessed local priorities as part of the delivery of a Community Strategy. The Improvement and Development Agency<sup>(25)</sup> have stated that communities strategies are intended to:
- “promote the social, economic and environmental wellbeing of their area to achieve sustainable development..... Strategies are expected to reflect local needs and build upon local circumstances”.*
- 6.1.5 This development appears utterly at odds with the findings of the MORI poll, the LDF survey and the Community Strategy.

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21. St Albans City and District Council, 2005, 2005 MORI poll, pages 5 and 6 (Appendix STRIFE 01/02)
22. St Albans & District Local Strategic Partnership, 2007, St Albans and District Sustainable Community Strategy, (Shaping Our District Together for 2021) pages 6 and 7 (Appendix STRIFE 01/04)
23. St Albans City and District Council, 2006, Joint Issues and Options Consultation for the St Albans Local Development Framework (Appendix STRIFE 01/03)
24. Her Majesty's Stationary Office, 2000, The Local Government Act 2000
25. Improvement and Development Agency, quoted via their website  
<http://www.idea.gov.uk/idk/core/page.do?pagelId=73225>

## 7. CONCLUSION

- 7.1.1 Green Belts play an important role wherever they are situated. In some areas, however, their role is even more crucial in preventing expanding communities merging together, particularly in areas where the Green Belt has already suffered ravages from previous development. People who choose to live in this part of the country do so because they wish to enjoy the advantages of the country whilst still being close to London. To introduce a facility of the type and size proposed represents a cruel irony for those who chose to live in the country but would find themselves encroached upon by one of the largest industrial complexes of its types ever seen in this country. The added significance of its proximity to an historic town of the importance of St Albans borders on industrial insanity.
- 7.1.2 From my own personal point of view, my life in Park Street would be ruined should this proposal go ahead. I would not hesitate to move (albeit taking a loss on the sale of my property) at the earliest opportunity. I have a young child, my wife is asthmatic, and it would be unthinkable for us to continue living next to a construction site for a number of years and then a facility the size of five terminal 5s with its effective destruction of our way of life in terms of noise, air and light pollution and enormous increases of traffic on local roads. It is hard for me to find words that would accurately convey the extent of the loss that would be occasioned by the arrival of this industrial leviathan within the boundaries of the beautiful and historic city of St Albans.
- 7.1.3 Although the views stated above are personal to me, similar views are common throughout the local community. I am yet to meet anyone who lives locally who does not believe that the arrival of an SRFI would be anything other than a catastrophe. There are numerous people that I have spoken to who have lived in the area for many years and some for all their lives. Every one of them has their own tale to tell of the personal loss they would suffer were this proposal to go ahead. This statement is intended as just one typical example.
- 7.1.4 This proof of evidence will be posted on our website [www.strife.biz](http://www.strife.biz) and any comments/endorsements will be submitted to the Inquiry with the supplements.