

## **THREE RIVERS DISTRICT COUNCIL**

### **NEW LOCAL PLAN POTENTIAL SITES CONSULTATION**

#### **RESPONSE FROM KINGS LANGLEY & DISTRICT RESIDENTS ASSOCIATION**

##### **Site reference CFS26A Kings Langley Estate south of M25**

The site is close to the M25 which would result in air quality and noise issues for residents of any new housing. The nitrogen dioxide levels are particularly noticeable some distance from the motorway itself, particularly when there is little, if any, wind. This would seem contrary to Three Rivers own sustainability sub objective 'To minimise noise and odour pollution, particularly in residential areas' by creating a large residential area in an area with existing noise and odour pollution (noticeably diesel).

In addition, the National Planning Policy Framework 2018 (NPPF) states planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks. This proposal would put a huge residential estate across public rights of way at the west and eastern ends.

The NPPF further states that substantial weight is given to any harm to the Green Belt unless there are 'very special circumstances,' but these 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. In this case this Green Belt land should be protected 'to prevent neighbouring towns merging into one another' and 'to check the unrestricted sprawl of large built-up areas'. This proposal would encourage coalescence between the historic villages of Kings Langley and Abbots Langley, thus failing 'to preserve the setting and special character of (two) historic towns.'

The level of additional infrastructure required would also be significant given the immediate area is devoid of transport, education and health services. For such a huge site, transport links would 'feed into' already overloaded trunk roads, e.g. A41, or residential streets.

##### **Site reference CFS26B Kings Langley Estate north of M25**

The site is also close to the M25 which would result in air quality and noise issues for residents of any new housing. The nitrogen dioxide levels are particularly noticeable some distance from the motorway itself, particularly when there is little, if any, wind. This would seem contrary to Three Rivers sustainability sub objective 'To minimise noise and odour

pollution, particularly in residential areas' by creating a large residential area in an area with existing noise and odour pollution (particularly diesel).

This site includes some ancient woodland which provides habitat for many species of animals and plants. Hertfordshire has very little semi-natural habitat remaining and that existing habitat networks are small and scattered. Woodland makes up about 10% of the county area, which is over half the total remaining area of all habitats. However, even woodland networks are highly fragmented and only a small proportion of those sites are classed as ancient and are consequently those that should be considered of the highest value and protected.

This site also includes two local wildlife sites; the Wildlife Trust has previously worked with local authorities, statutory agencies, landowners and other local partners to establish effective systems for identifying, managing and monitoring such sites. As a result, these special spaces have a huge part to play in the natural green fabric of Abbots Langley and Kings Langley and the surrounding countryside. The site also contains a site of historical value which the NPPF says planners should consider when considering the impact of a proposal on a historical asset, to avoid or minimise any conflict between its conservation and any aspect of the proposal.

In addition, the NPPF states planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks. This proposal would put a huge residential estate across 3 miles of public rights of way (Hertfordshire Way).

The NPPF further states that substantial weight is given to any harm to the Green Belt unless there are 'very special circumstances,' but these 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. In this case this Green Belt land should be protected 'to prevent neighbouring towns merging into one another' and 'to check the unrestricted sprawl of large built-up areas'. This proposal would encourage coalescence between the historic villages of Kings Langley, Abbots Langley and Hunton Bridge, thus failing 'to preserve the setting and special character of historic towns.'

Finally, the level of additional infrastructure required would also be significant given the immediate area is devoid of transport, education and health services. For huge a huge site, transport links would feed into busy residential streets already used as 'rat runs'.

### **Site reference CFS1 114-118 Toms Lane, Abbots Langley**

The site is at the southern end of Toms Lane and access is via a predominantly residential street, within a series of other residential streets. Vehicular and pedestrian access westwards towards Kings Langley, the nearest village, would be under a narrow railway bridge barely suitable for two, smallish vehicles or eastwards via Bedmond High Street.

However, St Albans local plan has sited most of its proposed developments on the east side of its boundaries which would 'funnel' all the associated traffic through Bedmond to access trunk roads and motorways. The level of additional infrastructure required would consequently be significant given the immediate area is devoid of upgraded transport, education and health services, particularly given the recent residential developments at the Ovaltine and Sappi Graphics sites.

Whilst there is a low risk of flooding, including surface water flooding, at this site and other sites in Toms Lane, the cumulative effect of residential development may be more serious and needs to be considered.

There are also a great many wildflowers along the more rural stretches either side of Toms Lane including Common Sorrell, Germander Speedwell, For-get-me-not, Garlic Mustard, Cow Parsley, Silverweed, Common Rock Rose and Ribwort Plantain. In the circumstances it is difficult to understand how so many sites both large and small have been identified as having a negative impact which is not significant across measurements of biodiversity, soils and landscape.

The NPPF states that substantial weight is given to any harm to the Green Belt unless there are 'very special circumstances,' but these 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. In this case this Green Belt land should be protected 'to prevent neighbouring towns merging into one another' and 'to assist in safeguarding the countryside from encroachment'. This proposal would encourage coalescence between the historic villages of Kings Langley and Apsley/Hemel Hempstead, thus failing 'to preserve the setting and special character of (two) historic towns.'

In addition, there is further concern that the significant number of smaller sites which include those in and around the 'Kings Langley' corridor of Station Road, Toms Lane, Egg Farm Lane, Harthall Lane et al have a phasing period of 1-5 years. If all these were brought forward it is going to provide 2,500 houses.

### **Site reference CFS2 Land at Three Acres, Toms Lane, Abbots Langley**

This is brownfield land in the Green Belt, but it is not on the Brownfield Register as it is still a business.

The site is at the southern end of Toms Lane and access is via a predominantly residential street, within a series of other residential streets. Vehicular and pedestrian access westwards towards Kings Langley, the nearest village, would be under a narrow railway bridge barely suitable for two, smallish vehicles or eastwards via Bedmond High Street.

However, St Albans local plan has sited most of its proposed developments on the east side of its boundaries which would 'funnel' all the associated traffic through Bedmond to access trunk roads and motorways. The level of additional infrastructure required would consequently be significant given the immediate area is devoid of upgraded transport, education and health services, particularly given the recent residential developments at the Ovaltine and Sappi Graphics sites.

The NPPF states that substantial weight is given to any harm to the Green Belt unless there are 'very special circumstances,' but these 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. In this case this Green Belt land should be protected 'to prevent neighbouring towns merging into one another' and 'to assist in safeguarding the countryside from encroachment'. This proposal would encourage coalescence between the historic villages of Kings Langley and Apsley/Hemel Hempstead, thus failing 'to preserve the setting and special character of (two) historic towns.'

Whilst there is a low risk of flooding, including surface water flooding, at this site and other sites in Toms Lane, the cumulative effect of residential development may be more serious and needs to be considered.

### **Site reference CFS7 Land south of Toms Lane, north of Abbots Langley**

The site is south of the M25 which would result in air quality and noise issues for residents of any new housing. The nitrogen dioxide levels are particularly noticeable some distance from the motorway itself, particularly when there is little, if any, wind. This would seem contrary to sustainability sub objective 'To minimise noise and odour pollution, particularly in residential areas' by creating a large residential area in an area with existing noise and odour pollution (noticeably diesel).

The site is at the north eastern end of Toms Lane, albeit not on Toms Lane, with access via Bedmond High Street. However, St Albans local plan has sited most of its proposed developments on the east side of its boundaries which would 'funnel' all the associated traffic through Bedmond to access trunk roads and motorways. The level of additional infrastructure required would consequently be significant given the immediate area is devoid of upgraded transport, education and health services.

Whilst this is a mix of brownfield land and greenfield land located in the Green Belt, the brownfield land is not on the current Brownfield Register. The NPPF states that Green Belt land should be protected 'to prevent neighbouring towns merging into one another' and 'to assist in safeguarding the countryside from encroachment'. This proposal would encourage coalescence between the villages of Kings Langley and Bedmond, thus failing 'to preserve the setting and special character of (two) villages.

The majority of ACFS9D is also set within this site.

#### **Site reference ACFS9D Bedmond Road, Abbots Langley**

This site is brownfield land, included on the Brownfield Register and located in the Green Belt. The site is south of the M25 which would result in air quality and noise issues for residents of any new housing. The nitrogen dioxide levels are particularly noticeable some distance from the motorway itself, particularly when there is little, if any, wind. This would seem contrary to sustainability sub objective 'To minimise noise and odour pollution, particularly in residential areas' by creating a large residential area in an area with existing noise and odour pollution (noticeably diesel).

The site is accessed via Bedmond High Street. However, St Albans local plan has sited most of its proposed developments on the east side of its boundaries which would 'funnel' all the associated traffic through Bedmond to access trunk roads and motorways. The level of additional infrastructure required would consequently be significant given the immediate area is devoid of upgraded transport, education and health services.

The NPPF states that Green Belt land should be protected 'to assist in safeguarding the countryside from encroachment' and 'to prevent neighbouring towns merging into one another'. This proposal would encourage coalescence between the villages of Kings Langley and Bedmond, thus failing 'to preserve the setting and special character of (two) villages.

The site is included within the boundary of CFS26A and CFS7.

### **Site reference CFS25 Four Winds off Toms Lane**

The site is adjacent to the mobile home park in Toms Lane and access is via a predominantly residential street, within a series of other residential streets. Vehicular and pedestrian access westwards towards Kings Langley, the nearest village, would be under a narrow railway bridge barely suitable for two, smallish vehicles or eastwards via Bedmond High St.

However, St Albans local plan has sited most of its proposed developments on the east side of its boundaries which would 'funnel' all the associated traffic through Bedmond to access trunk roads and motorways. The level of additional infrastructure required would consequently be significant given the immediate area is devoid of upgraded transport, education and health services, particularly given the recent residential developments at the Ovaltine and Sappi Graphics sites.

The NPPF states that substantial weight is given to any harm to the Green Belt unless there are 'very special circumstances,' but these 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. In this case this Green Belt land should be protected 'to assist in safeguarding the countryside from encroachment'. This proposal would encourage coalescence between Kings Langley and Abbots Langley, thus failing 'to preserve the setting and special character of (two) historic towns.'

Whilst there is a low risk of flooding, including surface water flooding, at this site and other sites in Toms Lane, the cumulative effect of residential development may be more serious and needs to be considered. There is a mix previously developed (brownfield) land and greenfield land, located in the Green Belt, but the amount of 'brownfield' land is small and not on the brownfield register.

### **Site reference ACFS9A Land off Toms Lane**

Site within boundary of CFS26B.

The site is adjacent to the railway tunnel in Toms Lane and access is via a predominantly residential street, within a series of other residential streets. Vehicular and pedestrian access westwards towards Kings Langley, the nearest village, would be under the railway bridge barely suitable for two, smallish vehicles at Station Road at its junction with Water Lane or eastwards via Bedmond High Street.

However, St Albans local plan has sited most of its proposed developments on the east side of its boundaries which would 'funnel' all the associated traffic through Bedmond to

access trunk roads and motorways. The level of additional infrastructure required would consequently be significant given the immediate area is devoid of upgraded transport, education and health services, particularly given the recent residential developments at the Ovaltine and Sappi Graphics sites.

Whilst there is a low risk of flooding at this site and other sites in Toms Lane, the cumulative effect of residential development may be more serious and needs to be considered. There is a mix previously developed (brownfield) land and greenfield land, located in the Green Belt, but the amount of 'brownfield' land is minimal and not on the brownfield register.

#### **Site reference ACFS9C, Egg Farm Lane**

Site included within the boundary of CFS26B (above).

The entrance to this site is opposite Roman Gardens and provides access under a narrow railway bridge to RES, the railway station car park and a small housing development via unmade roads. Vehicular and pedestrian access westwards towards Kings Langley as there is currently no suitable vehicular access eastwards.

It is a very small site and it is difficult to see how 10-20 units, with associated parking, could be accommodated. There is insufficient educational, health and transport services to provide for further residential development in the immediate area given the recent residential developments at the Ovaltine and Sappi Graphics sites.

Whilst there is a low risk of surface water flooding, at this site and other sites close to Toms Lane, the cumulative effect of residential development may be more serious and needs to be considered.

#### **Site reference PCS34 and 52, Hilltop Road off Toms Lane**

The entrance to the site is situated off Toms Lane (on the northside) at a 'dog-leg.' The access is at the northern end of Toms Lane which is a predominantly residential street, within a series of other residential streets. Vehicular and pedestrian access westwards towards Kings Langley, the nearest village, would be under a narrow railway bridge barely suitable for two, smallish vehicles or eastwards via Bedmond High Street.

However, St Albans local plan has sited most of its proposed developments on the east side of its boundaries which would 'funnel' all the associated traffic through Bedmond to access trunk roads and motorways. The level of additional infrastructure required would

consequently be significant given the immediate area is devoid of upgraded transport, education and health services.

The NPPF states that substantial weight is given to any harm to the Green Belt unless there are 'very special circumstances,' but these 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. In this case this Green Belt land should be protected 'to assist in safeguarding the countryside from encroachment' and 'to check the unrestricted sprawl of large built-up areas'. This proposal would encourage coalescence between the historic villages of Kings Langley and Abbots Langley, thus failing 'to preserve the setting and special character of (two) historic towns.'

Whilst there is a low risk of flooding at this site and other sites in Toms Lane, the cumulative effect of residential development may be more serious and needs to be considered. PCS52 is adjacent to the north of PCS34.

#### **Site reference OSPF21, The Timber Yard (IPS), 65 Toms Lane**

The site is almost adjacent to the mobile home park in Toms Lane and access is via a predominantly residential street, within a series of other residential streets. Vehicular and pedestrian access westwards towards Kings Langley, the nearest village, would be under a narrow railway bridge barely suitable for two, smallish vehicles or eastwards via Bedmond High St.

However, St Albans local plan has sited most of its proposed developments on the east side of its boundaries which would 'funnel' all the associated traffic through Bedmond to access trunk roads and motorways. The level of additional infrastructure required would consequently be significant given the immediate area is devoid of upgraded transport, education and health services, particularly given the recent residential developments at the Ovaltine and Sappi Graphics sites.

The site is brownfield land and is included on the Brownfield Register, although it is in the Green Belt. Whilst there is a low risk of flooding at this site and other sites in Toms Lane, the cumulative effect of residential development may be more serious and needs to be considered.

#### **Site reference CFS76, Rear of 45 Harthall Lane**

Harthall Lane is effectively a single-track road with access to the west under a very narrow railway bridge to Primrose Hill and to the east towards Bedmond Road where much of St

Albans Local Plan has proposed a significant level of residential development. The Three Rivers consultation also includes 8 sites in Toms Lane to the south which would access all other routes via the same two roads.

The level of additional infrastructure required would consequently be significant given the immediate area is devoid of upgraded transport, education and health services, particularly given the recent residential developments at the Ovaltine and Sappi Graphics sites.

Most of the land on the north of Harthall Lane is farmland and small industrial units. It is difficult to see the justification for a major residential development which would double or treble the number of residential units onto Harthall Lane with a single point of access.

The site is greenfield land located in the Green Belt; whilst there is a low risk of flooding, the proximity of so much farmland and the cumulative effect of the potential level of development in Toms Lane could impact this assessment with farm and water 'run off'.

The NPPF states that substantial weight is given to any harm to the Green Belt unless there are 'very special circumstances,' but these 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. In this case this Green Belt land should be protected 'to assist in safeguarding the countryside from encroachment' and 'to check the unrestricted sprawl of large built-up areas'.

This proposal would encourage coalescence between the historic villages of Kings Langley and Abbots Langley, thus failing 'to preserve the setting and special character of (two) historic towns.'

**Site reference CFS28, Gypsy Lane, Hunton Bridge (see also CFS71)**

The site is in Leavesden Park off Gypsy Lane which is a minor road with access to the A41 near the Hunton Bridge roundabout to the south and to a traffic light-controlled junction to the west. In other directions the roads are to Leavesden Studios to the east and into residential streets to the north, but there are little or no educational or health services and insufficient transport services to provide for 230-310 residential units. If the land is 'safeguarded' for Leavesden Studios the same concerns apply, but the traffic volumes will be continuous throughout the day. There are no local shops for a residential development.

This site also includes two local wildlife sites; the Wildlife Trust has previously worked with local authorities, statutory agencies, landowners and other local partners to establish effective systems for identifying, managing and monitoring such sites. As a result, these

special spaces have a huge part to play in the natural green fabric of Hunton Bridge and Kings Langley and the surrounding countryside.

The NPPF states that substantial weight is given to any harm to the Green Belt unless there are 'very special circumstances,' but these 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. In this case this Green Belt land should be protected 'to prevent neighbouring towns merging into one another' and 'to check the unrestricted sprawl of large built-up areas'. This proposal would encourage coalescence between the historic villages of Kings Langley and Abbots Langley, thus failing 'to preserve the setting and special character of (two) historic towns.'

#### **Site reference PCS60, Land at Furtherfield, near Hunton Bridge/Leavesden**

The site is north of Leavesden Studios and east of other sites in Hunton Bridge. It was previously a landfill site and there is possible contamination. Unsurprisingly there are question marks in terms of both sustainability assessment (SA) objectives SA6 (to make efficient use of land and protect soils) and SA10 (to improve the health and well-being of the local population). Nevertheless, the site has been identified for 370-500 houses.

Whilst the area is closer to educational and health services than other sites, these are already over-subscribed. In addition, the primary access to the site would be via South Way, i.e. in the opposite direction to available services. To the west is access to the A41 (a traffic light-controlled junction). In other directions the roads are to Leavesden Studios to the east and residential streets to the north. None are suitable for such a large site.

#### **Site reference CFS71, Land rear of Kings Head, Hunton Bridge**

This site is currently a pub and near site CFS28 to the east and an existing major residential development to the north; it is to the north of this site that vehicular access would need to be provided. This would place further demands on this section of the A41 given the proposals at Langleybury to the west and the larger Hunton Bridge development.

There are little or no educational or health services and insufficient transport services in the area. There is a local wildlife habitat to the south west; the Wildlife Trust has previously worked with local authorities, statutory agencies, landowners and other local partners to establish effective systems for identifying, managing and monitoring such sites. As a result, these special spaces have a huge part to play in the natural green fabric of Hunton Bridge and Kings Langley and the surrounding countryside.

In addition, whilst the site comprises brownfield land it is not on the Brownfield Register. There is also greenfield land, with most of the site in the Green Belt. The site is also at risk of flooding, which will be further exacerbated by nearby potential developments.

It is difficult to understand the attraction of demolishing a listed building (The Kings Head), which itself is in the Hunton Bridge Conservation Area, for such a small return.

### **Site reference CFS23, Land south of Langleybury Lane**

Following a public consultation, the Langley and Grove Development brief (2012) covering this site envisaged “a 21st century hotel and health complex, built around wellbeing and lifestyle experiences and incorporating a working organic farm. The organic farm would be a key focus of the guests’ wellbeing and lifestyle experience along with providing both Langleybury and The Grove with sustainable organic produce.

It would also offer the opportunity for hotel guests and day visitors to explore and better understand how food is produced and cooked, thereby creating both an educational and recreational experience. As part of this wellbeing and lifestyle experience, the development would also include a health farm.” That said, there was one line in the document which added “Where practical and feasible an element of housing development should complement any hotel / leisure development.”

Sadly, Langleybury House, a Grade II listed building, has been allowed to fall into decline and with potential now identified for 120-180 houses that housing would form the major development on the site.

The site itself has access to the A41 to the west and east, albeit it is a minor road (Langleybury Lane) which passes a church and primary school to the east and The Grove and gravel pits to the west.

To the north is the proposed MOTO service station which is site reference CFS20, but which is likely to generate a separate planning application early in 2019. The additional traffic generated by both these developments would put an unsustainable demand on this section of the A41.

Apart from the primary school, already over-subscribed, there is no educational, health and transport services to provide for this residential development anywhere between Kings Langley and Watford.

Clearly there is brownfield land on the site, some of which is on the Brownfield Register, but it is also one of the most visually intrusive sites listed in the consultation document. It

would have “a greater impact on the openness of the Green Belt than the existing development” and therefore be contrary to NPPF guidelines.

The NPPF also states that substantial weight is given to any harm to the Green Belt unless there are ‘very special circumstances,’ but these 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. In this case this Green Belt land should be protected ‘to assist in safeguarding the countryside from encroachment’ and ‘to check the unrestricted sprawl of large built-up areas’.

#### **Site reference CFS55, Land west of Station Road, Kings Langley**

The site comprises brownfield land, buildings operated by A T Oliver, and greenfield land, and is wholly located within the Green Belt. It is adjacent to several other large and small-scale sites listed in the consultation document which cumulatively would put an unsustainable demand on local roads.

It is also difficult to imagine a more unsuitable site for major employment development given the proximity to the M25 (air and noise pollution), the flood plain, signifying a high risk of flooding *and* surface water flooding, the Grand Union Canal (a local wildlife site) is to the west and the only vehicular access is via Station Road close to the existing traffic lights at the single lane railway bridge.

#### **Site reference ACFS8B, Flower House, Station Road**

This site is currently a florist and almost adjacent to 2 major planned residential developments in Home Park Mill Link Road (Pinnacle House (91 residential units) and West Herts College (65 residential units). The northern boundary of the site is adjacent to site PCS36 whilst the site CFS55 is located nearby to the west; in addition, there are 12 other potential locations feeding into the Station Road / Primrose Hill corridor.

Many of the problems associated with CFS55 are present for this site, plus the added drawback that this would be a residential development. For example, the proximity to the M25 (air and noise pollution), the flood plain, signifying a high risk of flooding *and* surface water flooding, the Grand Union Canal (a local wildlife site) is to the west and the only vehicular access via Station Road close to the existing traffic lights at the single lane railway bridge and pedestrian lights.

There are little or no educational or health services and – apart from the railway station - insufficient transport services in the area. Whilst much of the site is brownfield land it is not on the Brownfield Register.

#### **Site reference PCS36, Land opposite Alpine Press, Station Road**

Looking at the associated map, this currently appears to be used as an overflow car park for Imagination with access onto Station Road adjacent to pedestrian lights. Given its location, the site has many of the drawbacks to ACFS8B on the southern boundary, namely it is almost adjacent to 2 major planned residential developments in Home Park Mill Link Road (Pinnacle House (91 residential units) and West Herts College (65 residential units). The site CFS55 is located nearby and there are 12 other potential locations feeding into the Station Road / Primrose Hill corridor.

In addition, the proximity to the M25 (air and noise pollution), the flood plain, signifying a high risk of flooding *and* surface water flooding, the Grand Union Canal (a local wildlife site) is to the west and the only vehicular access via Station Road.

There are little or no educational or health services and – apart from the railway station - insufficient transport services in the area for further residential development.

#### **Site reference CFS24 South West Junction 20 of the M25 – MOTO services**

The proposal for a service area for the M25 at Junction 20 *and* Junction 17 is overkill. Clockwise services are available at Junctions 21 (Bricket Wood), 22 (London Colney) and 23 (South Mimms). At their exhibition the operator stated that it is for traffic travelling south down the M1 and anticlockwise on the M25, but services are available for them off the M1 at Hemel Hempstead and at Bricket Wood.

If additional services are required on the M25 they would arguably be better placed at Junction 17 where a great deal of groundworks have already been completed for HS20 which could be used for the service station site once the works are completed. The Junction 20 site is landfill undertaken during the M25 widening. This development will be visually intrusive and have “a greater impact on the openness of the Green Belt than the existing development” and therefore be contrary to NPPF guidelines.

The NPPF also states that substantial weight is given to any harm to the Green Belt unless there are ‘very special circumstances,’ but these 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. In this case this Green Belt land should be protected 'to assist in safeguarding the countryside from encroachment' and 'to check the unrestricted sprawl of large built-up areas'. In this respect, the Hunton Bridge Conservation Area is within the site's southern boundary.

The site comprises greenfield land located within the Green Belt. The western boundary is adjacent to the M25 and its eastern boundary adjacent to the A41; access to the site would be via a new junction on the A41 between Langleybury Church and the Junction 20 roundabout.

The site is south of the M25 which would result in even poorer air quality from nitrogen dioxide and noise issues, especially for the church and primary school on the southern edge of the site. There is a particular concern about the effect of increased exposure to diesel fumes on the health of children. Diesel fuel, like gasoline, is a hydrocarbon-based fuel. For adults, short-term exposure to diesel fumes can cause eye irritation, skin or respiratory tract problems, and/or cause dizziness, headache or nausea, but numerous studies have revealed that these issues can cause more serious, longer-term damage to school-age children.

MOTO services have suggested the service station will create only a small increase in traffic (around 5%), but this takes no account of the significant increases in traffic that will be funnelled through the A41/M25 corridors as a result of the local housing and employment development plans for Dacorum, Three Rivers, St Albans and Watford. The current MOTO proposal, with no such developments, would require a major reconfiguration of the M25 roundabout and it is difficult to see how any such work could be contemplated until all these local authorities have finalised their plans and studies have been undertaken to realistically assess demand.

Even without these developments, the MOTO site proposal has potential to cause massive traffic congestion through Kings Langley, Apsley, Hemel Hempstead, Hunton Bridge and Abbots Langley. Apart from the A41 and A4251, all the other local roads are single or two lane, many only accessible through height and width restricted bridges, e.g. Hunton Bridge. There are already significant traffic queues every day through local villages, with road closures on the A41 and M1 causing bumper-to-bumper traffic jams at least twice a month.

The impact of additional traffic generated by a motorway service station at Junction 20, particularly heavy goods vehicles, would further exacerbate the existing traffic problems.