



Planning and Building Control  
St Albans City and District Council  
Civic Centre  
St Peter's Street  
St Albans  
Hertfordshire  
AL1 3JE

Our ref: PL/LA/35257  
13<sup>th</sup> February 2025

To whom it may concern,

**LAND BETWEEN 84 AND 108 RAGGED HALL LANE, CHISWELL GREEN, ST ALBANS, HERTFORDSHIRE, AL2 3NN**

We write in support of the outline planning application (all matters reserved) for the construction of seven self-build and custom housebuilding dwellings, at Land between 84 and 108 Ragged Hall Lane, Chiswell Green, St Albans, Hertfordshire, AL2 3NN.

An application for the same development quantum on the site was previously submitted by the same applicant in 2024, and the planning application in question was validated by St Albans City and District Council as the Local Planning Authority ('LPA') on 25th January 2024. Hertfordshire County Council (HCC), as local highway authority, were consulted on this application by the LPA on 24th April 2024.

The purpose of this letter is to confirm that the matters raised by HCC Highways in response to the planning application promoted under reference 5/22/1517 dated 8th May 2024 have been satisfactorily resolved. It further demonstrates that the site is situated within a sustainable location with reference to Paragraph 155 part c of the National Planning Policy Framework (NPPF).

***Hertfordshire's Place and Movement Planning and Design Guidance (P&MPDG)***

The formal response from HCC Highways dated 8th May 2024 refers heavily to HCC's Place and Movement Planning and Design Guidance (PfiMPDG), adopted by Hertfordshire's Cabinet in March 2024. The PfiMPDG has not been formally adopted by the LPA at this time.

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The representation contended that the submitted plans did not comply with the PfiMPDG in three principal respects:-

1. The minimum applicable carriageway width requirement is 5.5m, whereas the proposal was to widen Ragged Hall Lane to 4.8m within the vicinity of the site;
2. The maximum applicable kerb radius is 4m, whereas the submitted proposals showed 6m kerb radii at the site accesses; and
3. The PfiMPDG places emphasis on the need to provide for people walking as the “first and primary consideration”. HCC Highways considered that since pedestrian access to the site was proposed to be taken via the adjacent Public Right of Way (PRoW) and across the shared surface area fronting the proposed dwellings, the proposals failed to meet this requirement.

In response to the first of these points, it is noted that the provision of a 4.8m wide carriageway on Ragged Hall Lane would provide sufficient space for a refuse vehicle to pass a car.

Examination of the output ATC data arising from a 7-day all movement traffic survey undertaken at the site frontage to Ragged Hall Lane in April 2022 confirms that only 4 heavy vehicles (i.e. those of vehicle class 6 to 12) were recorded to pass along Ragged Hall Lane to the site’s frontage over the 7-day survey period, which equated to only 0.1D% of the total 2,06D (all vehicle) movements. There were two heavy vehicle movements in each direction (i.e. 2 westbound and 2 eastbound) across the 7-day period.

Importantly, the ATC survey confirmed no record of opposing heavy vehicle movements during the same single hour period. In the time since the ATC survey was carried out in April 2022, no major schemes of development have been implemented in or around Chiswell Green that could have led to a material change in vehicle movements utilising Ragged Hall Lane. Likewise, no major highway schemes have been implemented in and around Chiswell Green that could have otherwise led to a variation in assignment of vehicle movements to the local highway network.

It is not, therefore, considered proportionate for the carriageway of Ragged Hall Lane to be widened to 5.5m within the site vicinity, not least as this would unduly urbanise the lane and potentially induce additional traffic flow. A widening of Ragged Hall Lane along the frontage of the site to 4.8m is considered to be both appropriate and satisfactory.

In order to address the second point, it is noted that 4m kerb radii have been instated at both proposed site accesses on the proposed plans.

In response to the third point, the proposed site layout plan has been revised. The section of the PRoW (St Michael Rural 010) within the red line application boundary will be surfaced and will connect with a proposed 1.2m wide pedestrian footway running parallel to Ragged Hall Lane to the south of the shared private drive serving the proposed dwellings. This footway will have dropped kerb and tactile paving provision at the proposed vehicular accesses to the site.



On this basis, it is considered that the proposals are fully compliant with the relevant requirements of the PfiMPDG.

### ***Sustainable location***

NPPF Paragraph 110, to which Paragraph 155-part c. refers, states the following:-

*“Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”*

NPPF Paragraph 115, to which Paragraph 155-part c. also refers, states the following:-

*“It should be ensured that sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location.”*

It is noted in this regard that the site is situated within 650m of bus stops, equivalent to an eight-minute walk (assuming a walking speed of 80m per minute), which provide access to regular services to St Albans, Luton, Watford, and other destinations.

Numerous everyday services and facilities are also available within a reasonable walking distance of the site, including, but not limited to, convenience stores, a primary school, a doctor’s surgery, and a pharmacy. Continuous footway provision subject to street lighting is available between the site and these facilities.

### **Kinsbourne Green Appeal Decision - February 2025**

It is understood that proposed construction of a single residential dwelling on a site referenced as ‘Land between Bluebell Grange and Harkaway, Kinsbourne Green’ (appeal reference APP/B1D30/W/24/334D774) was allowed on appeal dated 6th February 2025. The site is located in St Albans City and District administrative area.

Hertfordshire County Council, as local highway authority, did not raise an objection to the scheme at the planning application stage, despite the fact the site is in a rural location and there are no paved footpaths or street lighting along this part of Annables Lane, which is likely to discourage walking. The site location is presented in appended **Figure 1**. Considerations as to whether the proposal would utilise grey belt land and if the development would be in a sustainable location is set out in paragraph 7 of the appeal decision, presented overleaf:



*“7. The main parties agree that the appeal proposal would utilise grey belt land and would not fundamentally undermine the purposes of the remaining Green Belt. They also agree that there is a demonstrable unmet need for housing in the district. They disagree on whether the development would be in a sustainable location.”*

Paragraphs 8 to 10 of the appeal decision, presented below, explore if the development in question is in a sustainable location or not.

*“8. The appeal site is in a rural location and is not within a recognised settlement. However, paragraphs 110 and 115 of the Framework state amongst other considerations that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and that it should be ensured sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location.*

*D. The appeal proposal is for 1 house, on a plot between 2 existing houses. Several other houses are visible on Annables Lane from the site. While my site visit only represents a snapshot in time, I saw a steady flow of vehicles along the road during that time. While the proposal is for a large house and would add to the volume of private vehicles using the road, the increase from a single dwelling would be limited in proportion to the existing traffic on the road. In addition, the site is about 4 kilometres from Harpenden railway station, a distance in line with the average cycle journey recorded in the National Travel Survey. The site is also about 1 kilometre from the nearest bus stop, around the average walking distance recorded in that Survey.*

*10. I am mindful that there are no paved footpaths or street lighting along this part of Annables Lane, which is likely to discourage walking. However, the appeal site lies within a loose group of existing houses and is not in any less of a sustainable location than them. On balance, therefore, the appeal site is a sustainable location for the erection of 1 dwellinghouse.”*

Despite there being no paved footpaths or street lighting proximate to the site, coupled with the distance from the site to a nearby settlement benefitting from everyday services and facilities, the Inspector opined that the site ‘lies within a loose group of existing houses and is not in any less of a sustainable location than them.

#### Ragged Hall Lane Appeal Decision - January 2025

It is further noted that within the recent appeal decision concerning the previous planning application (dated 20th January 2025, ref. APP/B1D30/W/24/3345004), the Inspector concluded in paragraph 28 overleaf:-

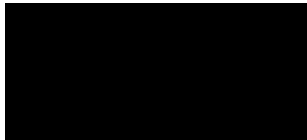


*“28. The site is not located within an area at risk of flooding, is accessible by public transport, could be built without harm to neighbours living conditions and would have an acceptable impact on local biodiversity and the character and appearance of the area. These, and other neutral factors, weigh neither for nor against the proposal.”*

In the context of the modest scale of the proposed development and in respect of appeal decisions issued post-adoption of the revised Framework on 12th December 2024, it is considered that it is fully compliant with NPPF Paragraphs 110, 115, and 155-part c.

In summary, therefore, it is evident that the matters previously raised by HCC Highways in relation to the proposals have been satisfactorily resolved, and that the site is in a sustainable location for residential development in accordance with the Framework.

Yours faithfully,



Leo Ashby  
DHA Planning



Enclosures

Figure 1. Aerial of Land between Bluebell Grange and Harkaway, Kinsbourne Green

