

**KEEP CHISWELL GREEN**

**Response to  
S62A Application  
Reference S62A/2025/0087**

**for  
ST ALBANS CITY AND DISTRICT COUNCIL  
PLANNING APPLICATION REFERENCE  
5/2025/0331**



**Land between 84 - 108 Ragged Hall Lane, Chiswell Green**

**Statement by  
Keep Chiswell Green**

## **Introduction**

1. Keep Chiswell Green (KCG) is a local volunteer-led campaign group, formed in response to the now numerous planning applications submitted for the development of the Metropolitan Green Belt all round Chiswell Green. KCG can confidently say it represents the overwhelming majority of residents of Chiswell Green, based on 98% of residents who have supported us through our door to door canvassing of in excess of 1,000 properties in the village.
2. This statement has been compiled in response to the invitation by St Albans City and District Council ("the Council") to make comments on the planning application (LPA reference 5/2025/0331) by Hammond Land and Consulting Ltd for development at 84-108 Ragged Hall Lane, Chiswell Green, Hertfordshire. The description of the proposed development is as follows :

*"Outline planning application (all matters reserved other than access) for 7 serviced plots for self-build and custom housebuilding."*

## **Background**

3. Chiswell Green is a medium-sized village to the south of St Albans. It has approximately 2,750 residents and 1,250 dwellings, 1 primary school, 1 public house and a small number of local shops including a bakery and a post office. It is one of 3 distinct villages in the parish of St Stephen, and is separated from St Albans by the parcel of Green Belt land of which the appeal site forms a part.
4. Plans were submitted in 2011 by the applicant for development of 5 dwellings on this site under LPA reference 5/2011/1685. The reasons for refusal included :
  - i) *"the proposed development is an inappropriate use within the Green Belt" and "no exceptional circumstances are apparent"*
  - ii) *"the site is located within land designated as part of the Watling Chase Community Forest which ... welcomes schemes which ... provide increased opportunities for nature conservation, leisure and recreation"*
  - iii) *"the proposed buildings, by reason of their size and prominent position, would be detrimental to the openness, character and visual amenity of the Metropolitan Green Belt landscape"*
5. Plans were submitted in 2022 for 7 detached dwellings under LPA reference 5/2022/1517. The Council's refusal was upheld in October 2023 in appeal decision App/B1930/W/23/3320280 in which Inspector Wilson stated :

25. *I have concluded that the proposal constitutes inappropriate development in*

*the Green Belt, that it would have significant impacts on its openness. Therefore, the application of policies in the Framework which protect Green Belts provide a clear reason for dismissing the appeal. Consequently, the proposal does not benefit from a presumption in favour of sustainable development.*

*26. However, I attach moderate weight to the provision of 7 dwellings. The other considerations that weigh in favour of the proposal only carry moderate weight when considered as a whole. In this case therefore, all these positive aspects when considered together do not clearly outweigh the harm that I have identified. Consequently, the very special circumstances necessary to justify granting planning permission for development in the Green Belt do not exist.*

6. The Applicant submitted a further application in 2024, LPA reference 5/2024/0144, also for 7 serviced plots for self-build and custom house building. Whilst commenting that he “found the arguments in favour of this development to be engaging”, Inspector Bowden upheld the Council’s refusal of this application in appeal decision App/B1930/W/24/3345004 of January 2025, stating :

*29. However, I have concluded that the proposal constitutes inappropriate development in the Green Belt and that it would have significant impacts on its openness. I find that the other considerations, both individually and cumulatively, do not clearly outweigh the harm to the Green Belt that I have identified. Consequently, the very special circumstances necessary to justify the development do not exist.*

*30. The proposed development would conflict with the development plan taken as a whole and the Framework and the material considerations do not indicate that the appeal should be decided other than in accordance with it. Therefore, for the reasons given above the appeal should be dismissed.*

7. It is worth noting that this decision was made after the December 2024 publication of the revised NPPF which included the new category of “grey belt” which Inspector Bowden considered in his appeal decision.

### **The application proposal**

8. The application proposal is for 7 detached houses, and the applicant stresses that these houses contribute to the Council’s obligation to provide plots for self-build or custom-build properties. However, it seems clear from the proposal that these

would not be self-build; the properties are configured in such a way that there could be very little change from the illustrated plan. At best, purchasers may be offered a choice of colour of kitchen units, flooring or tiles.

9. Whilst the Council is required to keep a register of residents looking for a self-build or custom-build plot, this register is notoriously difficult to maintain as residents do not think to update the Council if they have found a property or changed their minds. It is therefore probable that the register over-estimates local demand in this category.
10. The applicant promotes the proposal as contributing towards the District's housing need. However, the application only proposes 7 detached houses, which, in previous iterations of the proposal, were 5-bedroomed properties (this does not seem to be specified in this application). The greatest need for housing in the District is for 3-bedroomed properties which this proposal will do nothing to provide.
11. Additionally, the greatest need in the District for housing is for social rented housing. The application properties are most likely to be privately owned, and as a small development, there is no obligation to provide any affordable housing. This proposal does not therefore make any contribution towards the District's key needs.
12. Furthermore, a periodic search on Rightmove.co.uk indicates that there are typically in the region of 400 houses for sale within the District with 4- or 5-bedrooms at any given time. This does not indicate a shortage of housing in the category proposed by this application.
13. The application is keen to highlight the new "grey belt" designation to support the proposal. However, even if this site were to be considered "grey belt" (which we strongly contest), the application does not meet the "golden rules" – it would not deliver 50% affordable housing, it would not deliver infrastructure improvements, and it would not deliver green space provision. We suggest therefore that this application does not meet any of the softened terms of the NPPF which are aimed at increasing development approvals.
14. The application's Heritage statement refers to "cropmarks" indicating a potentially prehistoric enclosure close to the site, but does not consider that Ragged Hall Lane leads, from the application site, to the hamlet of Potters Crouch. A Conservation Area in its own right, Potters Crouch is thought to have once been part of the original Roman town of Verulamium, but is recorded as a hamlet in its own right from prior to 1300. As the Site Context map shows, every building in Potters Crouch appears to have listed status. The construction of 7 imposing modern detached

houses along the route to Potters Crouch would most certainly detract from the historic character and setting of the area.

15. The application includes a substantial amount of documentation referring to other applications, appeals and approvals. We respectfully refer to the principle that each application should be considered on its own merits.

### **Draft Local Plan and housing delivery**

16. St Albans City and District Council has submitted its Draft Local Plan for Examination, the Stage 1 hearings for which commence on Tuesday 29<sup>th</sup> April 2025. The Plan uses an objectively-assessed housing-need figure of 15,096 over the Plan period which necessitates the release of nearly 2,000 acres of Green Belt land. It is worth noting that, despite significant lobbying from the applicant, and the Council aiming to fulfil the District's housing targets in all categories in full, the application site, and the Green Belt sub-area of which it forms a part, have not been considered suitable for inclusion for development in the Plan.
17. Although the District has recorded a shortfall in housing delivery against its target, permissions have been granted over the last year for a large number sites in the Green Belt across the District providing between 95 and 550 units each, which will eradicate the shortfall. Around Chiswell Green alone, permission has been granted for nearly 1,000 units. One site in north-west Harpenden has permission for 550 new houses. A number of these developments are at reserved matters stage now.
18. Assuming smooth progress through the Examination process, the Council currently anticipates adoption of the Local Plan by March 2026.

### **Green Belt**

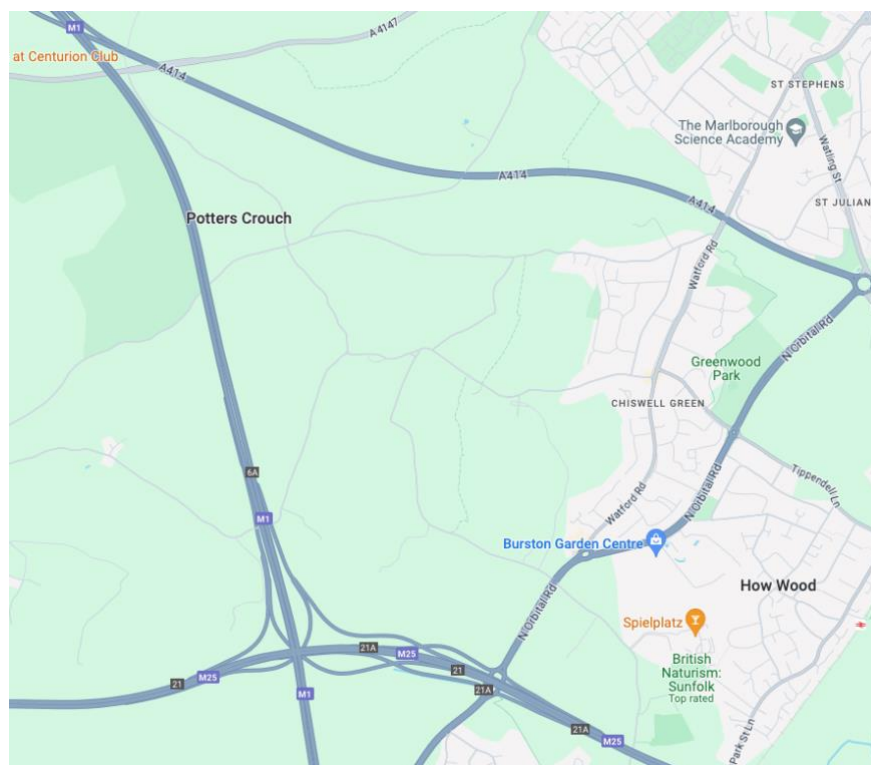
19. The application site sits within the Metropolitan Green Belt and the Watling Chase Community Forest area boundaries. It also sits within the St Stephen Plateau which is highlighted in the Hertfordshire Landscape Character Assessment 2014 for its expanses of woodland and wooded farmland. Additionally, the site sits in close proximity to the Ancient Woodland of Park Wood. The protections accorded to the Green Belt, to the Community Forest areas and to Ancient Woodlands are therefore pertinent to this application.

20. The Green Belt Review undertaken by Sinclair Knight Merz (SKM) and published in November 2013 (*Appendix 1*) did not consider the application site as having potential for development. Their assessment of Strategic Land Parcel GB25, of which the application site forms the northern part, reports that the M25, M1 and M10 are *“highly audible intrusive”* (GB25 - Green Belt Purposes Assessment PDF p41 para 3). Additionally, along with Strategic Parcels GB24 and GB29, their report states that GB25 *“contributes to the primary local gap separating St Albans and Chiswell Green”* and that *“the gap is narrow at 0.2km. Given the scale of (the gap), any reduction would compromise the separation of settlements in physical and visual terms, as well as visual openness”* (p41 para 5). The application site is therefore judged by this review to be unsuitable for development.
21. The application site was assessed again by Arup as part of the more granular Stage 2 Green Belt Review 2023 (*Appendix 2*) in preparation for the draft Local Plan. Still within Strategic Land Parcel 25, the application site comprises 2.1ha of the 20ha sub-area 141. This assessment considers that the sub-area has a *“largely rural character”* and *“less than 1% ... covered by built form”* (Green Belt Review 2023 - Annex Proforma Report p629 Purpose (3)). It concludes that its removal from the Green Belt *“would represent a significant erosion of the gap between Chiswell Green and St Albans”* (p630 Wider Green Belt Impacts para 2) and *“would result in two very small ‘islands’ of Green Belt being created in the backs of residential gardens on Ragged Hall Lane”* (para 4).
22. The assessment continues that this irregular spread of the built-up area would damage the existing *“readily recognisable and likely to be permanent”* inner and outer boundaries and that the site *“makes an important contribution to the wider Green Belt”*. It is therefore *“not recommended for further consideration”* (p631).
23. The site is clearly visible from all directions - from the south by those travelling along Ragged Hall Lane, from the north, east and west by those using the Ancient Woodland of Park Wood and the public rights of way which surround the site. Once built, a development would also be visible to those using the Green Belt land to the north of the application site, as well as those using the Green Belt land to the north of the A414, particularly during the winter months when the lack of foliage would expose the development to onlookers.
24. The applicant appears not to have submitted an agricultural land classification with the application documents. However, the soil on the adjacent land was assessed to be Soil Type 6 according to the Land Information Service developed by Cranfield University which states that Soil Type 6 is suitable for a range of spring and autumn sown crops, and when under grass, the soils offer a long grazing season. The lived experience of local residents is that this land has been used for farming wheat,

barley and rapeseed, and similar land in the area is used for grazing. It is clear then that the land is eminently capable of supporting agricultural usage, specifically for food crops and animal husbandry, and is therefore agricultural land which qualifies it as best and most versatile, and entitles it to the added protection of this category.

### **Air quality**

25. Chiswell Green sits locked in a triangular-shaped area of motorways and dual carriageways between M1, M25, A414 and A405, with the B4630 Watford Road, the most heavily trafficked B-road in Hertfordshire, running through the middle of it (*Appendix 3 - Hertfordshire Traffic and Transport Data Report 2022 p24 Fig 3.2.1*). In fact, Watford Road is the 19th busiest road of the top 25 in Hertfordshire which include the M25, M1 and A1(M), and 7 of these 25 are located around the village of Chiswell Green. The proximity of the strategic road network is particularly obvious in relation to the appeal site with the busy A414 (previously known as the M10) located immediately to the north of the site.

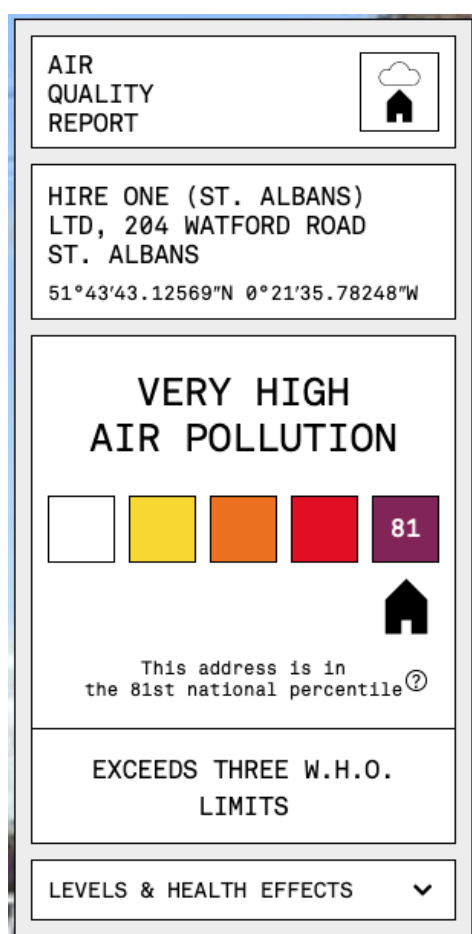


*Chiswell Green surrounded by M1, M25, A405 and A414*

26. The Green Belt around Chiswell Green is fulfilling a purpose that was not considered even as late as 1988 when the Principles of the Green Belt were incorporated into Planning Policy Guidance Note No2, since superseded by the NPPF - that of

improving our air quality through the cleansing properties of the trees and plants that are supported by the land.

27. In its 2023 Local Air Quality Management Status Report (*Appendix 4 – Executive Summary*), St Albans City and District Council recognises that air pollution is associated with a number of adverse health impacts and is a contributing factor in the onset of heart disease and cancer. The main source of air pollution within the District is from vehicle emissions, the main pollutant of concern being Nitrogen Dioxide (NO<sub>2</sub>). The report quotes that the cost to the NHS and social care in the UK is estimated to have been £157m in 2017.
28. AddressPollution.org gives access to the general public to air pollution readings measured by Imperial College, London, in locations all around the UK. It also indicates where readings exceed World Health Organisation limits for human health.
29. In the centre of Chiswell Green, at postcode AL2 3EB, the readings are as follows :



#### LEVELS & HEALTH EFFECTS

##### Pollutant one: PM2.5

At this address, the annual average of the pollutant PM2.5 is 11.35mcg/m<sup>3</sup>. The World Health Organization limit is 5mcg/m<sup>3</sup>.

[This study](#) shows 19.9% of strokes were attributed to exposure (for a year or more) of PM2.5 concentrations exceeding 10mcg/m<sup>3</sup>.

PM2.5 can also cause asthma, jeopardize lung functions and [promote cancer](#).

##### Pollutant two: PM10

The reading for PM10 at this address is 18.03mcg/m<sup>3</sup>. The limit is 15mcg/m<sup>3</sup>.

Cardiovascular mortality increases by 0.76% and respiratory mortality by 0.58% [for every 10mcg/m<sup>3</sup> increase of PM10](#).

PM10 can cause [wheezing, bronchitis and reduce lung development](#).

##### Pollutant three: NO<sub>2</sub>

The reading for NO<sub>2</sub> at this address is 24.67mcg/m<sup>3</sup>.



The limit is 10mcg/m<sup>3</sup>.

Exposure (for a year or more) to 30mcg leads to a 5.5% increased risk of [disease related mortality](#).

30. Comparatively, at 84 Ragged Hall Lane AL2 3LD, the air quality reading is 76 (vs 81 in the centre of the village), as the PM2.5 reading drops to 11.12mcg/m<sup>3</sup> (compared to 11.35mcg/m<sup>3</sup>), the PM10 reading drops to 17.51mcg/m<sup>3</sup> (compared to 18.03mcg/m<sup>3</sup>), and the NO<sub>2</sub> reading drops to 23.18mcg/m<sup>3</sup> (compared to 24.67mcg/m<sup>3</sup>) which no doubt reflects lower vehicle usage of Ragged Hall Lane compared to Watford Road.
31. At Little Daneswick AL2 3NU, a farmhouse property situated in the Green Belt but on a country lane which is heavily used by lorries and farm vehicles, the air quality reading drops further again to 70, with the PM2.5 at 10.82mcg/m<sup>3</sup>, the PM10 reading at 17.09mcg/m<sup>3</sup>, and the NO<sub>2</sub> reading at 21.71mcg/m<sup>3</sup>.
32. For a more striking comparison, the air quality reading for a farmhouse on a working farm near Longridge, Lancashire, in the Forest of Bowland Area of Outstanding Natural Beauty at PR3 2TN is 15 (compared to 70-81 in Chiswell Green), with a PM2.5 reading of 7.52mcg/m<sup>3</sup>, a PM10 reading of 13.21mcg/m<sup>3</sup>, and an NO<sub>2</sub> reading of 10.27mcg/m<sup>3</sup>.
33. It is clear therefore that local residents in Chiswell Green rely on the cleansing action of the Green Belt to improve air quality affected by the local road networks, and that exchanging green space for built environment will negatively impact local air quality and the health of local residents.

#### **Public Right of Way St Michael Footpath FP 010**

34. The start of PRoW St Michael Footpath 10 is along the eastern boundary of the application site. This rural footpath is well used and is popular with residents from St Albans (north of the A414) as well as with residents from Chiswell Green.
35. A survey of FP10 was conducted by residents of Ragged Hall Lane, the results and report of which are attached as Appendix 5 to this response. The survey was conducted between 8am and 6pm on a hot Saturday during August 2023 when a notable football match was being televised during the afternoon. Despite the holiday season, the warm day and the distraction of the football match during the afternoon, the survey demonstrates that FP10 is likely to be used by in excess of 80 people a day during daylight hours. This figure does not include groups who would

use the footpath on weekdays for specific activities, such as the local Scouts and the Hertfordshire Health Walks groups, and who may increase the daily usage number by 20 or more in a day. Over the last year, activity walk events have been held utilising the PRoWs (including FP10 beside the application site), the most recent of which attracted over 200 participants.

36. FP10 is currently a completely rural public right of way, bordered by wild hedges, and running from Ragged Hall Lane along the Green Belt boundary beside number 84, turning east to join FP41 on the far side of Westfields Farm. It provides a route by which the public can pass along a linear route at all times, and provides a traffic-free alternative to an on-road path, benefitting equestrian users, and also encouraging local residents to travel on foot or by bicycle.

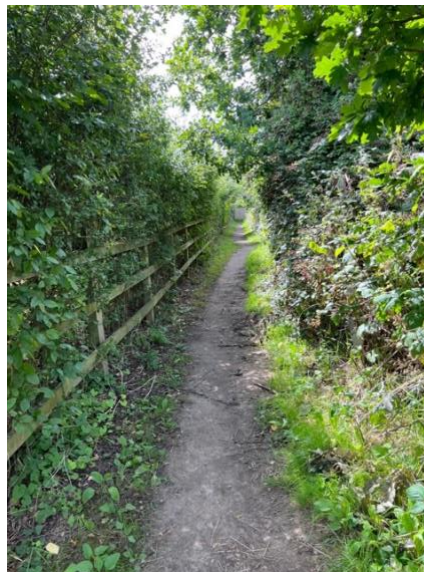


*Start of PRoW FP10 along the Green Belt boundary by 84 Ragged Hall Lane*

37. The course of this PRoW feels entirely rural with open countryside on the western side and to the north after the footpath turns 90° to run east :



*PRoW FP10 north from Ragged Hall Lane*



*PRoW FP10 eastbound*

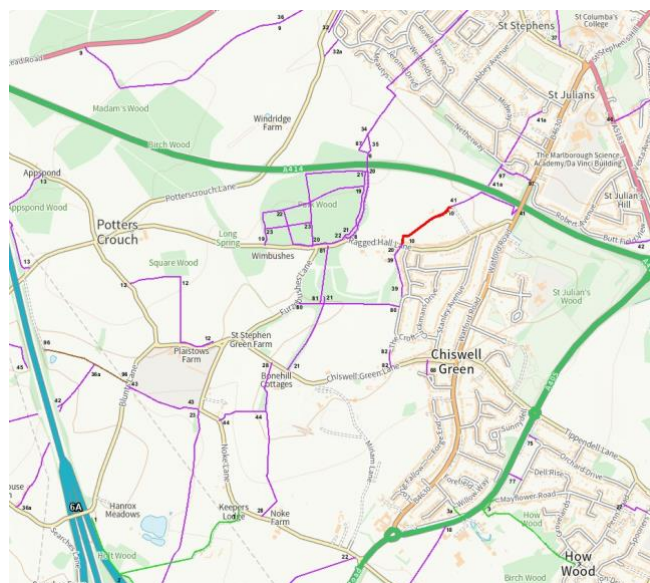


38. The footpath then opens out of enclosed foliage to see more open countryside as it approaches Westfields Farm :



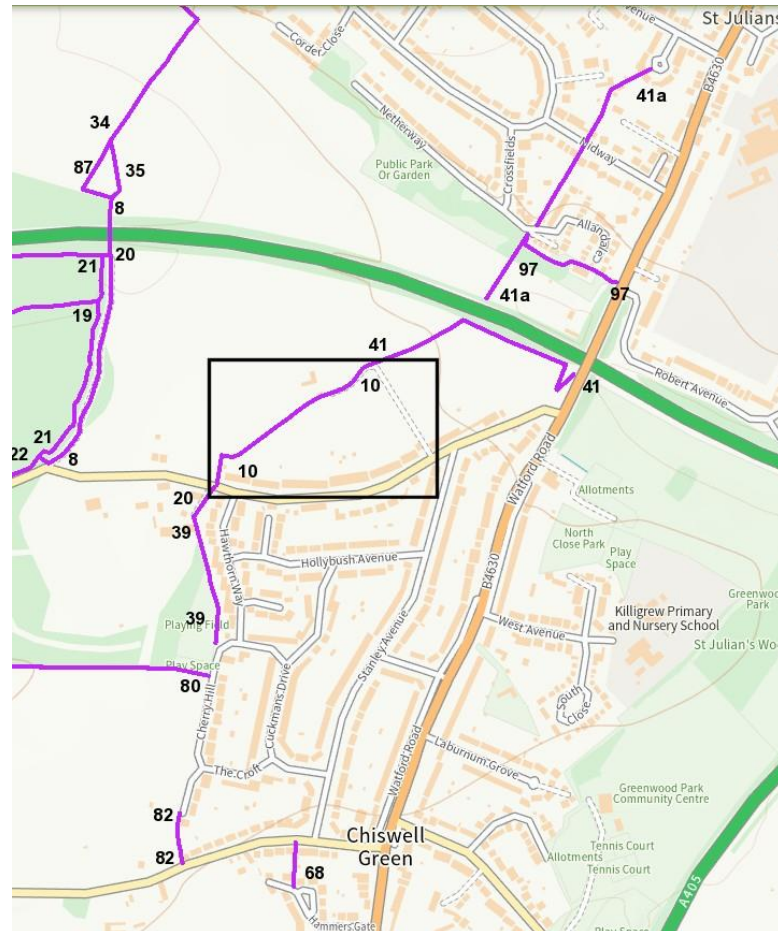
*PRoW FP10 heading east towards Westfields Farm*

39. As can be seen from the Hertfordshire County Council Rights of Way Viewer map below, FP10 forms part of the network of public rights of way which criss-cross the Hertfordshire countryside. However, in the area of the appeal site, the footpaths are not as numerous with only one route linking urban south St Albans with Chiswell Green and the countryside to the west and south of the St Stephen Parish villages. FP10 forms a critical link in this route (*highlighted in red on the map below*) :



*From Hertfordshire County Council Rights of Way Viewer 2023*

40. The applicant is proposing to resurface the public footpath alongside the application site. However, the benefit to users is its rural nature which resurfacing would eradicate. Currently, the start of FP10 provides a clear entrance into the countryside leaving behind the urban areas of Ragged Hall Lane and the residential areas to the south. Approving the appeal proposal would create a continuation of the urban environment into the otherwise rural route from south St Albans (*the northern point of FP41a*) to the Chiswell Green countryside and beyond (*FP80 and 82*).



*From Hertfordshire County Council Rights of Way Viewer 2023*

41. Landscape value can be defined as the value or importance society attaches to a landscape or view, which expresses national or local consensus; a landscape may be valued for its perceptual qualities as well as for its recreation value. Evidence that the landscape is valued for recreational activity occurs where experience of the landscape is an important aspect of the experience.
42. The rural nature of this footpath brings additional benefits to users in the form of access to nature, wildlife and the open countryside. The St Albans Cub Scouts (aged 8-10) use this footpath regularly as it provides the children with a quick and safe

route to immediate access to nature and wildlife, from the Scout Hut on the built-up Watford Road into the ancient woodland of Park Wood. The Cubs are encouraged to look and listen for bats, owls, birds, plants, trees, deer, foxes and anything else of natural interest. Approval of the application proposal would result in an urban break for the Cubs between the green space to the east of the application site and the wood, diminishing the value of their excursion into nature

### **Health benefits**

43. Science is increasingly informing us of the benefits to physical and mental health derived from time spent in nature. Psychiatrist, Green Scholar for the Royal College of Psychiatrists, and local resident Dr Katherine Witter, has studied the impact of the presence of, and access to, green spaces on the physical and mental health of the population. Dr Witter's research (*Appendix 6*) has identified that biodiverse green spaces, such as the appeal site, are one of our most neglected health resources; access to nature and green spaces produces positive outcomes for heart rate, blood pressure, stress levels, mood, self-esteem, obesity, type two diabetes, post-operative recovery, birth weight, children's cognitive development, and cardiovascular disease.
44. Dr Witter's research shows that income-related health inequalities are less marked when people have more access to green space where they live, and that exposure to nature has positive effects on psychological wellbeing and can reduce risk factors for mental illness. It is estimated that the NHS in England alone could save an estimated £2.1bn every year in treatment costs if everyone had access to good quality green space.
45. It is clear then that the access to nature and green space that is offered by FP10 is a significant benefit to the 80+ daily users of this PRow. Additionally, the sentiments expressed by local residents who have commented on this application attest to the fact that they value the landscape, the views and the recreational value offered by the public right of way and by the Green Belt through which it is routed.

### **Sustainability of the site**

46. KCG conducted a short survey of the transport habits of local adult residents in order to try to predict whether the residents of the proposed developments would be likely to use methods of active transport in order to access their everyday activities, and whether the application site could therefore be considered sustainable from a

transport perspective. The results of the survey are summarised here (*a de-personalised version of the raw data collected and full analysed results can be provided on request*).

47. There were 113 respondents to the survey, of which 57 (44%) live in Ragged Hall Lane. 61% of all respondents are in paid employment, including self-employment and paid care work. 27% of respondents are retired.
48. The average number of cars per household is 2, with 25% of respondents saying they anticipate that – contrary to the direction being encouraged by Government and climate scientists - the number of cars in their households will *increase* in the next 5 years. This may be a reflection of the 30% of respondents who have children currently of school age who may be anticipating that their children will acquire a vehicle within the next 5 years. In this case, it would reflect a strong sentiment among residents that a car is considered a necessity to live in Chiswell Green.
49. Due to a flaw in the survey design and limited amount of time available for its preparation and testing, respondents to this survey were only asked about leisure travel, not about travel to work. However, the results were surprisingly polarised with 85% of respondents saying that the start of any journey for leisure purposes would be by motor vehicle. While this includes 15% of residents who go on to take a bus or train, these residents nonetheless take a car to start their journey.
50. Particularly for the 15% of respondents who take the bus or train as part of their journey, this begs the question as to why such a large percentage starts their journey by car. The responses were as follows :

| <b><u>Reason for choosing car or private vehicle</u></b>   | <b><u>Percentage of respondents</u></b> | <b><u>Number of respondents</u></b> |
|--|---|-------------------------------------|
| Distance to be travelled                                   | 27%                                     | 44                                  |
| Bus routes inconvenient for destination                    | 16%                                     | 26                                  |
| Walking or public transport too slow/need to arrive faster | 15%                                     | 25                                  |
| Overall convenience  | 15%                                     | 25                                  |
| Bus too infrequent or unreliable                           | 11%                                     | 18                                  |
| No train station near my location or destination           | 8%                                      | 14                                  |
| Carrying heavy or numerous items                           | 8%                                      | 14                                  |
| Weather  | 8%                                      | 13                                  |
| Less safe to walk or cycle                                 | 7%                                      | 11                                  |
| Cost of public transport                                   | 5%                                      | 9                                   |
| Insufficient cycle routes                                  | 4%                                      | 7                                   |
| Health or disability restrictions                          | 4%                                      | 7                                   |
| Inconvenience of getting to the station                    | 2%                                      | 3                                   |

|   |    |   |
|---|----|---|
| Lack of bicycle parking at destination                          | 2% | 3 |
| Clothes appropriate for cycling not appropriate for destination | 2% | 3 |
| Caring for others (eg grandchildren)                            | 1% | 1 |

51. For a development to be sustainable in transport terms, residents should be able to access the services and facilities they need within a reasonable distance of their homes and to be able to access them via active travel modes of transport. These services and facilities include employment, school, leisure, shopping, and health and well-being.
52. Respondents with children of primary school age were asked how their children travel to school. 50% of respondents answered that their children travel on foot, although this figure increased to 81% when the primary school was stipulated as Killigrew School – the only primary school in the village and nearest to Ragged Hall Lane.
53. However, at a distance of 1.31km from the proposed development via Stanley Ave and Stanmount Ave, or 1.23km via Ragged Hall Lane and Watford Road, the increased distance to be travelled from the proposed development – essentially 50% more than the preferred maximum distance of 800m according to the DfT Manual for Streets - may dissuade the children living in any new development from travelling by foot, particularly when the hilly and uneven topography of the land is taken into consideration which makes this a significantly more challenging route for pedestrians.
54. When asked about travel to secondary school, 72% use a private motorised vehicle to get to school with 33% of parents considering that the distance to school is too far to walk or cycle, 20% saying it is not safe to walk or cycle due to traffic and a further 20% saying buses are too infrequent, unreliable or inconvenient for their destination. This implies that a number of local children attend schools outside the immediate area as the children of 85% of respondents whose children attend Marlborough School travel on foot.
55. The difficulties accessing facilities on foot or by bicycle become even more pronounced when the topography of the land is taken in consideration for routes north of King Harry Lane and Watling Street to the town centre.
56. Residents were also asked how they travel to local amenities. Given the proximity of Midway Surgery to Ragged Hall Lane and the high percentage of survey respondents from this road, 55% of respondents said they travel to the surgery by foot.

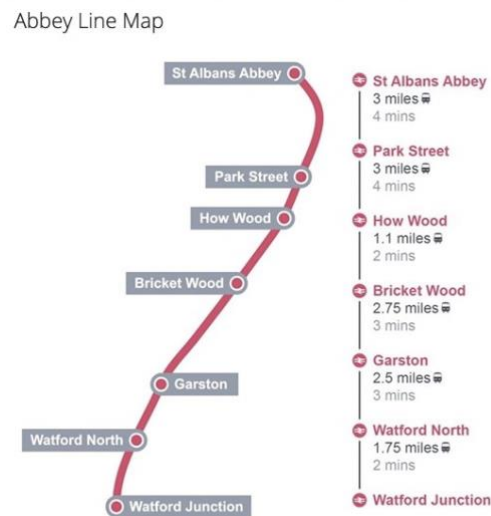
57. Comparatively, though, with regard to facilities in the village centre, fewer than 50% of residents access these facilities on foot, with the Pharmacy the most popular at 47% and an additional 2% by bicycle. Only 23% of residents access the Post Office on foot which may reflect the location of the Post Office beyond the village centre or the trend to move from sending letters to parcels.
58. It was clear from the responses that many residents have their groceries delivered (44%) and 88% use their cars to travel to supermarkets to shop. 71% of residents responded that they do not do their weekly shop at the small Co-Op supermarket in the village centre. This reflects the fact that the Co-Op has a limited range of items on sale and charges higher prices than large supermarkets.
59. The one amenity accessed largely on foot at 63% of respondents was Greenwood Park. This indicates that respondents generally travel by foot when accessing green spaces for leisure purposes but the convenience of a vehicle appears to override active travel modes when visiting a commercial amenity. This may also be a function of the time available to residents when utilising the park, presumably with more time available, compared to commercial facilities when their time is more pressurised.
60. When asked what would encourage them to change to travelling by active travel modes, 34% of respondents answered *"more time, less time pressure in my life"*, while 24% answered that *"nothing could persuade me due to the convenience of travel by car"*. 17% would like better weather conditions.
61. The responses above demonstrate that there is a high degree of dissatisfaction with local public transport options, some unavoidable (eg clothes appropriate to wear to cycle are not appropriate to wear at the end destination), but many relate to the inconvenience of public transport.
62. Chiswell Green is served by a number of bus services and there are bus stops in multiple locations through the village. However, a more comprehensive transport survey conducted for the Chiswell Green Inquiry in the Spring of 2023 (*Appendix 7*) with a larger number of respondents (245) found that bus travel was equally as unpopular. 67% of these respondents travel by car to work and a further 21% start their journey to work by car. 91% of respondents start their leisure journeys by car but only 7% going on to take the bus or train to complete the journey.
63. It may be reasonably assumed that residents of any new development around the village would adopt similar transport habits as the existing residents. Incentives to encourage active travel will struggle to be effective against behaviour patterns as



extreme as those prevalent amongst the transport survey respondents and considering the inconvenience of the local public transport options.

64. The application site would appear to be well served by bus transport from bus stops on the corner of Ragged Hall Lane and opposite at Midway Surgery, both within the preferred maximum walking distance of 800m according to the CIHT "*Providing for Journeys on Foot*" document published in 2000. The 321 and 361 Arriva bus services go to St Albans town centre at a rate of approximately 2 buses an hour, the 321 continuing on to Harpenden northbound or Watford southbound, the 361 travelling on to New Greens northbound or Bricket Wood southbound.
65. However, respondents to the transport survey for the Chiswell Green Inquiry indicated that 38% of working residents of Chiswell Green work in London, 30% in Chiswell Green (essentially working from home), 24% work in St Albans and 10% in Watford. There is very minimal employment in Chiswell Green itself. The 321 and 361 northbound to the town centre would serve those working in St Albans, but this does not consider residents who use their cars due to disability, as a requirement of their job (for example to travel to different locations during the course of their work), who carry heavy or numerous items for their work, or who drive others.
66. Only 1% of respondents responded that they always use the bus with the 321 service being the most popular at 58% of those who do use bus services.
67. The village is also served by the 724 Green Line service from Heathrow to Harlow via St Albans City Station, and the newly introduced 725 service from Rickmansworth to Stevenage, also via St Albans City Station. Each an hourly service, however, both of these are limited stop services. Residents are more likely to take public transport if it is easily accessible, frequent, reliable and fast. The 724 and 725 are none of these things and are often full even before arriving in Chiswell Green on their way to the station. This makes travel to the City Station difficult via bus from Chiswell Green with most residents resorting to their cars.
68. Although the sample size for respondents to the Ragged Hall Lane Transport Survey was small, an overwhelming majority at 96% of them reported that, if they use a station, they use St Albans City Station, but 91% of those who use a station access it by private vehicle.
69. St Albans City Station has direct links to Luton and Bedford to the north where the Thameslink Line stops, and to the south, it runs to St Pancras, Gatwick and Brighton. Other locations can, of course, be accessed by changing at London St Pancras or changing at other stations on the Thameslink Line, which would also be true of other mainline stations.

70. Residents of Chiswell Green also have access to the Abbey Flyer line – an hourly, single branch line service with only 7 stops including the terminus stations at St Albans Abbey and Watford Junction, passing through Park Street, How Wood, Bricket Wood, Garston and Watford North. At a distance from the centre point of the proposed development of between 2.08km to the St Albans Abbey Station, 2.86km to How Wood Station or 3.1km to Park Street Station, these are not viable options for active travel journeys, particularly not when it is considered that the Abbey Flyer mid-line stations have poor lighting, no staff, and no car parks or facilities for securing bicycles.



71. What is apparent in an analysis of transport to and from Chiswell Green is that most routes run north to south but there are very few viable public transport options from east to west, as is acknowledged by Hertfordshire County Council in their *A414 Corridor Strategy (Appendix 8)* : *“There are also very few opportunities for people to travel continuously by public transport which increases dependency on the car to make journeys along the corridor. There are also limited opportunities for walking and cycling, with poor and discontinuous routes in many areas.”* (pg 6 Executive Summary).
72. In summary, the Ragged Hall Lane transport survey appears to show that the village of Chiswell Green, with surrounding roads, is a community isolated from major industry, significant sources of employment or major amenities within ‘easy’ reach (i.e. by walking). As such, residents in the area are heavily reliant on car or van transport to travel to amenities beyond a doctor’s surgery and a small number of the local shops. This translates into a sound assumption that new housing, such as the application proposal, will automatically come with new owners who will own at least two or more cars or vans. The applicant’s own proposal supports this as 3 parking bays have been proposed for each of the 7 properties.

73. Contrary to environmental needs, there is a strong indication that, within this community, average car ownership will actually grow, this too reflected in any potential new housing. There appears to be little more than casual use of bus routes which, possibly following a national trend, have probably declined due to lack of a consistently reliable service. It would also appear unhelpful that there is a very limited and unreliable direct bus route to St Albans Station. Rail services are used but, with no station nearby, cars or vans are used to access them.
74. It is therefore clear from our transport survey and an examination of local transport services that active travel modes are not currently viable in Chiswell Green and the application site cannot be considered sustainable in transport terms.

## **Conclusion**

75. In conclusion, KCG reiterates that the application site is located in the Green Belt and close to an Ancient Woodland and a Conservation Area of heritage value, and asserts that there are no special circumstances which might outweigh the many harms that would be done to the site and the surrounding area should this development be approved.
76. Approval to develop Green Belt land around Chiswell Green would exert significant pressure on the many other sites already subject to speculative development.
77. The appeal site is located in the Green Belt and has not been supported for release under the 2013 SKM Green Belt Review or under the more granular 2023 Arup Green Belt Review due to its contribution to Green Belt purposes.
78. The air quality in Chiswell Green is significantly impaired by its proximity to the arterial road network, and the Green Belt land surrounding the village plays a major role in mitigating the impacts of pollution on air quality, and thus human health.
79. Population density in Chiswell Green is already significantly higher than in St Albans or in Hertfordshire and any further increase will exacerbate existing pressures on local services and facilities.
80. The loss of the rural character of PRow St Michael FP10 would be a material harm to the many users of this footpath.
81. Local residents derive many health benefits from the Green Belt around the village which would be lost with further development.

82. The proposal site is not sustainable from a transport perspective with almost a guarantee that residents of any new development would favour private vehicles rather than methods of active travel.
83. The proposal does not contribute in any significant way to the District's housing needs, which are close to having been met through the approval of a number of other large-scale speculative applications. It also fails to contribute in any way to the District's key needs which are 3-bedroomed and social rented houses.
84. The proposal does not meet the conditions of the "grey belt" category, nor does it satisfy the "golden rules" which may have weighed in its favour.
85. Although the application highlights many other appeal decisions, these are irrelevant as each application should be considered on its own merits.
86. Finally, the opposition to this development proposal by residents local to Chiswell Green and more widely in St Albans is extensive. It is inevitable that those who are going to be most affected will be vocal, however, it is notable that only 1 household in Ragged Hall Lane has supported this application compared to the hundreds of residents who have objected, often strongly, and sometimes repeatedly, and most of whom do not live in Ragged Hall Lane.
87. KCG respectfully reminds the Inspector that a decision in favour of this appeal is a decision that is not just final, but fatal for the Green Belt. We urge you, please, "Countryside, not concrete".

Please dismiss this appeal and Keep Chiswell **Green**.

Should a hearing be held in relation to this application, we would wish to make oral representations please at the hearing.

Thank you for your attention.

Keep Chiswell **Green**

28<sup>th</sup> April 2025

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## **Appendices**

|                   |   |                                |
|-------------------|---|--------------------------------|
| <b>Appendix 1</b> | <b>SKM Green Belt Review Purposes Assessment Final Report November 2013</b>   | <b>Annex 1.2 St Albans PDF</b> |
|                   | <a href="https://www.stalbans.gov.uk/sites/default/files/documents/publications/planning-building-control/planning-policy/examination-library/SP_EB_GBR_Part1_Nov2013_StAlbansParcelAssessments_tcm15-38993.pdf">https://www.stalbans.gov.uk/sites/default/files/documents/publications/planning-building-control/planning-policy/examination-library/SP_EB_GBR_Part1_Nov2013_StAlbansParcelAssessments_tcm15-38993.pdf</a>                             |                                |
| <b>Appendix 2</b> | <b>Arup Green Belt Review 2023 – Annex Proforma Report</b>  |                                |
|                   | <a href="https://www.stalbans.gov.uk/sites/default/files/attachments/St%20Albans%20GB%20Annex%20Report_20230612%20FINAL%20ISSUE%20low%20res.pdf">https://www.stalbans.gov.uk/sites/default/files/attachments/St%20Albans%20GB%20Annex%20Report_20230612%20FINAL%20ISSUE%20low%20res.pdf</a>   |                                |
| <b>Appendix 3</b> | <b>Hertfordshire Traffic and Transport Data Report 2022</b>   |                                |
|                   | <a href="https://www.hertfordshire.gov.uk/media-library/documents/highways/transport-planning/transport-and-accident-data/ttdr/hertfordshire-traffic-and-transport-data-report-2022.pdf">https://www.hertfordshire.gov.uk/media-library/documents/highways/transport-planning/transport-and-accident-data/ttdr/hertfordshire-traffic-and-transport-data-report-2022.pdf</a>   |                                |
| <b>Appendix 4</b> | <b>St Albans City and District Council 2023 Air Quality Annual Status Report</b>  |                                |
|                   | <a href="https://www.stalbans.gov.uk/sites/default/files/Environmental%20Services/Air%20Quality%20Annual%20Status%20Report%202023.pdf">https://www.stalbans.gov.uk/sites/default/files/Environmental%20Services/Air%20Quality%20Annual%20Status%20Report%202023.pdf</a>   |                                |
| <b>Appendix 5</b> | <b>Short footfall study of PRoW St Michael FP10</b>   | p22                            |
| <b>Appendix 6</b> | <b>The Importance of the Ragged Hall Lane Green Space for Mental and Physical Health, Dr Katherine Witter</b>   | p26                            |
| <b>Appendix 7</b> | <b>Chiswell Green Inquiry – Keep Chiswell Green Transport Survey</b>  |                                |
|                   | <a href="https://www.stalbans.gov.uk/sites/default/files/documents/publications/planning-building-control/Chiswell%20Green%20Inquiry/Core%20Documents/CD6/CD%206.%2021%20-%20Transport%20Survey.pdf">https://www.stalbans.gov.uk/sites/default/files/documents/publications/planning-building-control/Chiswell%20Green%20Inquiry/Core%20Documents/CD6/CD%206.%2021%20-%20Transport%20Survey.pdf</a>   |                                |
| <b>Appendix 8</b> | <b>Hertfordshire County Council A414 Corridor Strategy September 2019</b>   |                                |
|                   | <a href="https://www.stalbans.gov.uk/sites/default/files/documents/publications/planning-building-control/Chiswell%20Green%20Inquiry/Core%20Documents/CD8/CD%208.24%20-%20A414%20Corridor%20Strategy%20Technical%20Report.pdf">https://www.stalbans.gov.uk/sites/default/files/documents/publications/planning-building-control/Chiswell%20Green%20Inquiry/Core%20Documents/CD8/CD%208.24%20-%20A414%20Corridor%20Strategy%20Technical%20Report.pdf</a> |                                |

# **Short Footfall Study of Public Right of Way – St Michael’s Rural FP10 to the Rear of Ragged Hall Lane, Chiswell Green, St. Albans**

**Declaration of Interest:** this study was carried out by volunteer residents of Ragged Hall Lane on behalf of community group, Keep Chiswell Green. The group is against major development of the Green Belt in Chiswell Green and, as such, this study is not, and should not be misrepresented as, independent. Despite this, this simple survey has been conducted accurately and honestly.

**Aim:** to establish a reasonably useful idea of the use of the Public Right of Way St Michael’s Rural FP10 to the rear of Ragged Hall Lane, Chiswell Green, St. Albans, supported by some observational evidence.

**Method:** Volunteers took shifts to observe, count and record the tally of users on footpath FP10.

The study was carried out on the designated public footpath Ragged Hall Lane to Watford Road at the junction with the historic Park Wood to Westfields path (at 51.734391, - 0.362245), approximately behind 76 Ragged Hall Lane.

Times: Friday 11 August 2023 - 0700 to 0900 (2 hours continuous)

Saturday 12 August 2023 - 0800 to 1800 (10 hours continuous)

**Counts:** People who used the footpath were counted in the following categories: dog walkers, joggers, fruit pickers, walkers, other.

**Data:** see last page.

## **Observations on Method:**

Many people stated they walk a circuitous route that does not come back through the same location (for example returning along the lane). People passing the count-point twice were counted twice but most did not and they were counted only once.

Some people adopt different routes on different days so, some walkers absent on this day may visit on a different day. Dogs will generally be walked on this and other local routes every day regardless of weather.

While bicycle tracks were evident in the mud further towards Park Wood, no bicycles passed this route during the survey.

Saturday, the day of the survey, was subject to shower forecasts and there was an apparently significant football match in the afternoon.

Being August, footfall would be lower as this is typically part of the summer holiday season with no school traffic. Considering the number of local residents who were away on holiday, this could represent in excess of a 10% drop in footfall.

Additionally, the warm weather and afternoon football match could have displaced usual afternoon dog walkers into the evening (after the survey had ended) to benefit from the cooler temperatures.

It would not therefore be unreasonable to assume that the volume of users recorded represents lower than usual usage.

People who walked from Ragged Hall Lane (between 26 and 28) along the Westfields track north to the path and then turned eastwards towards Watford Road, or by that route in reverse, were not captured by the survey.

### **Conclusions and comments:**

In a 10-hour period on Saturday, 74 people used this path amounting to an average of 7.4 an hour. Accounting for the smaller number of people who would have used the path before and after the survey times, it appears reasonable to say that the daily use amounts to around 75-80 a day at about 8 people an hour during daylight. Footfall during darkness will be close to zero per hour.

There is a trend towards early mornings and late afternoon to evenings which equates to the needs of dog walking. This might change on different days for example, on Sunday, when warm afternoons may be more attractive to families after lunch.

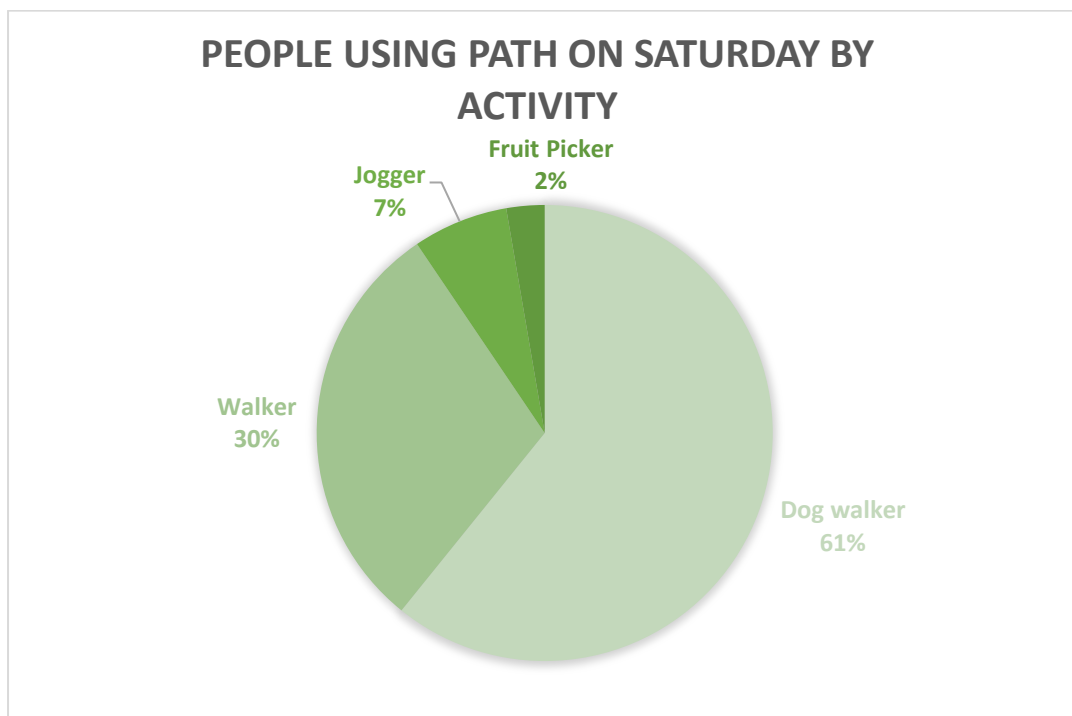
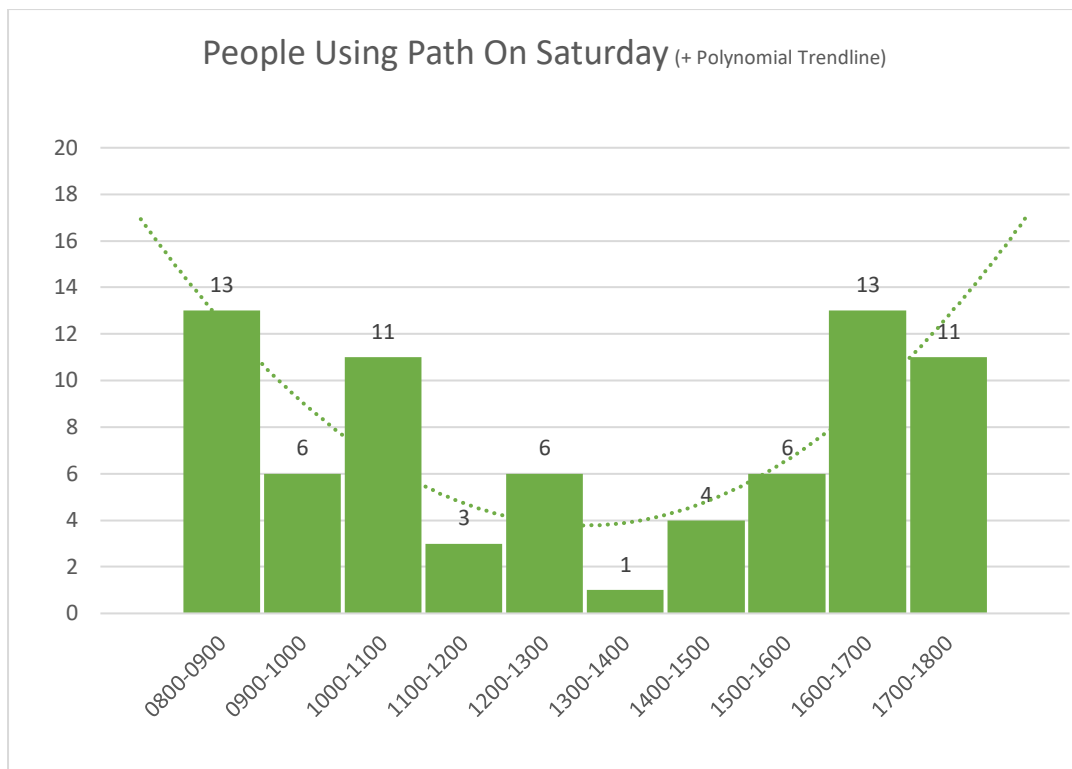
Although not counted specifically, gender use is broadly equal, and the majority were adults although some children were apparent in family groups and one separate pair of children.

Many people in interviews stated they were unaware of the threat to the Green Belt. No notices from the local authority or applicant developer were apparent along the footpath.

Interestingly, about a quarter, who engaged in conversation, stated they came from the opposite side of the A414.

The path is well-enough used to probably deter some wildlife activity away from immediately near the paths. Birdsong was considerable in the morning and evening (a variety of six garden birds according to the Merlin Bird Song phone App), but, very silent around midday. Red Kites were apparent overhead all day. A weasel was seen to quickly cross the Park Wood-to-Westfields path from south to north in the early morning. When quiet, some 'shuffling' can be heard in the brambles and bracken, but the source was not identifiable.

Blackberries are coming into fruit and being picked by people and dogs on their way.





## Data:

| Date                     | Times            | Hours | Dog walker |     | Jogger |     | Fruit Picke |   | Walker |   | Other | Total | Note |
|--------------------------|------------------|-------|------------|-----|--------|-----|-------------|---|--------|---|-------|-------|------|
|                          |                  |       | W          | E   | W      | E   | W           | E | W      | E |       |       |      |
| 11-Aug-23                | 0700-0800        | 1     | 4          | 2   |        | 1   |             |   | 1      |   |       | 8     |      |
| 11-Aug-23                | 0800-0900        | 1     | 2          | 1   |        |     | 1           |   | 1      |   |       | 5     |      |
|                          | Day Totals       | 2     | 6          | 3   | 0      | 1   | 1           | 0 | 2      | 0 | 0     | 13    |      |
|                          | Average per hour |       | 3          | 1.5 | 0      | 0.5 | 0.5         | 0 | 1      | 0 | 0     | 6.5   |      |
| West/East bound combined |                  |       | 9          |     | 1      |     | 1           |   | 2      |   |       | 13    |      |
| Average per hour         |                  |       | 4.5        |     | 0.5    |     | 0.5         |   | 1      |   |       | 6.5   |      |

| Date                     | Times            | Hours | Dog walker |     | Jogger |     | Fruit Picke |   | Walker |     | Other | Total | Note           |
|--------------------------|------------------|-------|------------|-----|--------|-----|-------------|---|--------|-----|-------|-------|----------------|
|                          |                  |       | W          | E   | W      | E   | W           | E | W      | E   |       |       |                |
| 12-Aug-23                | 0800-0900        | 1     | 3          | 2   | 2      | 1   |             |   | 5      |     |       | 13    | Weasel on path |
| 12-Aug-23                | 0900-1000        | 1     | 1          | 4   |        |     |             |   |        | 1   |       | 6     |                |
| 12-Aug-23                | 1000-1100        | 1     | 4          | 1   |        | 1   |             |   | 3      | 2   |       | 11    |                |
| 12-Aug-23                | 1100-1200        | 1     | 2          | 1   |        |     |             |   |        |     |       | 3     |                |
| 12-Aug-23                | 1200-1300        | 1     | 1          | 1   |        |     |             |   | 2      | 2   |       | 6     |                |
| 12-Aug-23                | 1300-1400        | 1     |            |     |        |     |             |   | 1      |     |       | 1     |                |
| 12-Aug-23                | 1400-1500        | 1     | 2          |     | 1      |     |             |   |        | 1   |       | 4     |                |
| 12-Aug-23                | 1500-1600        | 1     | 2          | 3   |        |     |             |   | 1      |     |       | 6     |                |
| 12-Aug-23                | 1600-1700        | 1     | 6          | 3   |        |     | 2           |   | 1      | 1   |       | 13    |                |
| 12-Aug-23                | 1700-1800        | 1     | 5          | 4   |        |     |             |   |        | 2   |       | 11    |                |
|                          | Day Totals       | 10    | 26         | 19  | 3      | 2   | 2           | 0 | 13     | 9   | 0     | 74    |                |
|                          | Average per hour |       | 2.6        | 1.9 | 0.3    | 0.2 | 0.2         | 0 | 1.3    | 0.9 | 0     | 7.4   |                |
| West/East bound combined |                  |       | 45         |     | 5      |     | 2           |   | 22     |     |       | 74    |                |
| Average per hour         |                  |       | 4.5        |     | 0.5    |     | 0.2         |   | 2.2    |     |       | 7.4   |                |

Compiled for Keep Chiswell Green

## **The Importance of the Ragged Hall Lane Green Space for Mental and Physical Health**

Dr Katherine Witter BM BSc (Hons) MSc MRCPsych PGCert FHEA

The appeal proposal suggests turning an irreplaceable stretch of 2.1 hectares of Green Belt land into housing. This would result in the loss of highly valued access to green space, the benefits this holds for both physical and mental health to the residents of St Albans and beyond, and the extensive biodiversity contained within it.

With the land and paths as they currently exist, there are significant benefits to the wellbeing of the local population, which cannot be underestimated. As a psychiatrist working here for Hertfordshire Partnership Foundation Trust (HPFT), and a Green Scholar for the Royal College of Psychiatrists (RCPsych), I am particularly concerned about the impact of the presence and access to green spaces on both the physical and mental health of the residents of Chiswell Green and wider Hertfordshire.

The RCPsych has declared a climate and ecological emergency.<sup>1</sup> The College acknowledges that climate change, pollution and biodiversity loss have created a health crisis, and it is imperative that psychiatrists are informed about and actively engaged in these issues.<sup>1</sup> Their full position statement can be accessed on their website: [The College's position on Sustainability | Royal College of Psychiatrists \(rcpsych.ac.uk\)](https://www.rcpsych.ac.uk/our-voice/our-position-statements/our-position-statement-on-climate-change-and-ecological-emergency)<sup>1</sup>

It is not just the RCPsych who hold such concerns, but multiple other colleges and organisation all recognise the benefits of access to green spaces on health and the detrimental effects of climate change on the population's wellbeing. For example, The Royal College of Paediatrics and Child Health (RCPCH) state they recognise the threat to health of children in particular, and joined national health and academic alliances to declare climate change an emergency requiring accelerated collaborative actions.<sup>2</sup> The Royal College of Physicians (RCP) particularly advocates for clean air and healthier lifestyle choices,<sup>3</sup> and the Royal College of Nursing (RCN) reports we are undermining the very foundation of our health, and promotes the positive effects on health at both an individual and societal level.<sup>4</sup>

Biodiverse green spaces, such as this Green Belt site, are one of our most neglected health resources.<sup>5</sup> A growing body of evidence points to the benefits of access to nature and green space, including positive outcomes for heart rate and blood pressure, stress levels, mood and self-esteem, obesity, type two diabetes, post-operative recovery, birth weight, children's cognitive development and cardiovascular disease.<sup>4</sup> When people have more access to green space where they live, income-related health inequalities are less marked.<sup>5</sup> In England alone, it has been calculated that the NHS could save an estimated £2.1 billion every year in treatment costs if everyone had access to good quality green space.<sup>5</sup>

This site is in close proximity to a two-form entry community primary school for 3–11-year-olds, Killigrew Primary and Infant school, with a school capacity of 420 pupils.<sup>6</sup> There is no doubt children, young people and the future generations will disproportionately bear the greatest effect of ecological degradation, due to the actions of our generation and the decisions we all make today.<sup>5</sup> Furthermore, the impacts of climate change and biodiversity loss are already impacting our young people's mental wellbeing, and the children of Chiswell Green are no exception. The RCPsych has conducted discussion groups with young people and identified high levels of fear, hopelessness, anger and hurt for what the future holds for them in terms of the climate and ecological crisis.<sup>1</sup>

Research increasingly indicates exposure to nature has positive effects on psychological wellbeing and can reduce risk factors for mental illness.<sup>7</sup> Notably in children, access to green space has the potential to benefit both mental well-being and improve cognitive development, possibly by facilitating physical activity and social cohesion, and mitigating exposure to air pollution.<sup>8</sup>

There are significant waiting lists for access to child and adolescent mental health services (CAMHS) and broader mental health services across the NHS.<sup>9</sup> Indeed, in August 2023 the number of people waiting for community mental health care was 1.2 million, with the NHS missing its targets.<sup>9</sup> We know mental health services are facing record levels of demand, with particular increases in demand for children's (notably eating disorder) services.<sup>9</sup> This impacts all NHS trusts including those in Hertfordshire, and has a further impact on local General Practice (GP) surgeries. Chiswell Green has Midway Surgery, a large practice providing care for the residents of Chiswell Green and St Albans<sup>10</sup> and uses the appeal site as one of the Hertfordshire Health Walks locations.<sup>23</sup> The simple availability of green space can reduce anxiety and anger, relax emotional state and improve self-esteem and mood.<sup>11,12</sup> If it remains as it is, this precious Green Belt site can continue to benefit the wellbeing of our residents which has the potential to reduce the need for formal local services.<sup>11,12</sup>

A feeling of 'nature connectedness' (i.e. an individual's belief of connection to nature) is associated with life satisfaction and improved day-to-day mood.<sup>13,14</sup> In addition to the Hertfordshire Health Walks group, this site, the land to the rear of 28-74 Ragged Hall Lane, is regularly used for a local St Albans running group (Striders),<sup>15</sup> by horse-riders, and for local Scout activities for children and young people.<sup>16</sup> A footfall study on the public right of way at the rear of Ragged Hall Lane identified high usage of the path by a variety of people, such as walkers, joggers, dog walkers and fruit pickers, all directly benefitting from using this public access route in their day-to-day lives for both health and recreational use.<sup>17</sup> In addition, by enabling connections with nature, greater ecological concern and sustainable behaviour can be promoted.<sup>11,12</sup> This benefits the climate and biodiversity crisis both within Chiswell Green and beyond.<sup>11</sup>

The United Nations (UN) predicts that by 2050, 68% of the world's population will live in urban areas – this will be almost 7 billion people. Evidence indicates greenspace in urban areas, such as St Albans, may have greater protective health effects than elsewhere, potentially by reducing harm from environmental exposures such as air pollution, heat, noise and artificial light at night.<sup>18</sup> Keeping biodiverse green areas in our urban locations will therefore likely result in co-benefits to the environment, for example through improved air quality, improved cooling, and to wellbeing.<sup>19</sup> We therefore need to focus on safeguarding access to quality green space, particularly for the young, the elderly or rehabilitating, those from disadvantaged groups and those individuals with pre-existing mental illness who may not be able to access green space if it is not available within walking distance of their home, school or activity location.

Equal access to nature must become a priority of local planning decisions and UK government. Studies increasingly indicate that the benefits of nature on reducing fatigue, anxiety, depression and stress are most significant for marginalised groups.<sup>20</sup> These groups are highly unlikely to be able to afford properties in the Chiswell Green area. The 18 dwellings currently being offered as "affordable" will not make much of an impact on the need for affordable housing in the District, but the 65% market housing included in the proposal and shown on the Indicative Masterplan close to the surrounding Green Belt will take away access to natural spaces which can prevent or improve mental and physical illness, in the groups that are most likely to benefit from it.

We all know climate change poses a major threat to our health as well as our planet. There is clear evidence that healthy environments and contact with nature are hugely important for

our mental health.<sup>21</sup> The environment is changing, that change is accelerating, and this has direct and immediate consequences for our residents, the public and the NHS.<sup>22</sup> I implore you to consider the above in your decision making on this planning application. I would be most willing to speak to you or your wider teams on these topics in more detail. Thank you very much for your time.

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