

**Standing up for Hertfordshire's countryside**

Adam Ralton  
Development Management (Planning)  
Three Rivers District Council  
Northway  
Rickmansworth  
Herts WD3 1RL

Our Ref:

Your Ref:

22<sup>nd</sup> May 2019 (by email)

Dear Mr Ralton,

**Application Ref 19/0646/OUT**

**Outline Application for construction of new Motorway Service Area (MSA) to comprise: amenity building, 80 bedroom lodge, drive-thru coffee unit, fuel filling station with retail shop, together with associated car, coach, motorcycle, caravan, HGV and abnormal load parking, alterations to the A41 including construction of a new roundabout and vehicular access, works to the local highway network and at Junction 20 of the M25 motorway. Provision of landscaping, signage, infrastructure and ancillary works. (Outline Application accompanied by an Environmental Statement with matters of Appearance, Landscaping and Scale reserved)  
on Land South West Of Junction 20 Of M25 And West Of A41 Watford Road,  
Hunton Bridge, Hertfordshire**

CPRE Hertfordshire object to this application for inappropriate development in the Green Belt. It is contrary to the Green Belt policies in the National Planning Policy Framework and the current Three Rivers Local Plan. As such, the applicant is required to present very special circumstances sufficient to outweigh the harm caused to the Green Belt through inappropriateness or other harm.

The 'very special circumstances' outlined in section 8 of the Planning Statement are, in summary:

- (i) Paragraph 146 of the NPPF accepts implicitly that some transport infrastructure must require a Green Belt location.
- (ii) 46 of the current MSAs are located on Green Belt sites.
- (iii) The possible sites between Junctions 16 & 17, and Junction 17 have "*been discounted in preference for a junction site at Junction 20.*"
- (iv) DfT Circular 02/2013 sets out the need and safety case for MSAs on the strategic road network which amounts to very special circumstances.
- (v) There are significant other benefits arising from the MSA development including direct and indirect support for businesses and employees.

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CPRE Hertfordshire is a Charitable Incorporated Organisation

**President:**  
*Sir Simon Bowes Lyon, KCVO*  
**Chairman:** *Richard Bullen*  
*Registered Charity 1162419*

In our opinion, these do not amount to “a strong and compelling case of very special circumstances as required by paragraph 144 of NPPF.”

Paragraph 146 (c) of the NPPF states that local transport infrastructure which can demonstrate a requirement for a Green Belt location is not inappropriate, *provided that it preserves the openness of the Green Belt*. This site at Junction 20 is at the eastern end of the Kings Langley viaduct and as such is on elevated land. The summit of the site, where the bulk of the facilities are located is approximately 30 metres above the proposed access point off the A4251, requiring the site to be terraced. It will be clearly visible from Kings Langley and the surrounding countryside and will impact on the character of those surroundings, not least through the light pollution from its 24 hour operation.

The fact that other MSAs have received approval for development in the Green Belt is not a very special circumstance. All planning applications must be considered on their own merit, and the circumstances will be different from site to site.

Nor is the fact that the applicant has discounted other sites a very special circumstance to justify development on this one. The Alternative Sites Assessment found three possible sites:

Junction 17 South-East Quadrant, Junction 20 North-West Quadrant and Junction 20 South-East Quadrant (the application site) and concluded that each of them were a “*Possible site for an MSA but must deal with physical characteristics of site and openness of the Green Belt.*”

In addition MOTO claim at para 10.1.1 of the Planning Statement that this site has been identified as a possible location for a Motorway Service Area (MSA) in the emerging Three Rivers Local Plan. In fact, the site is included in the Three Rivers Potential Sites Consultation Document dated November 2018 (as is that at Junction 17). That is not the same as saying that it is a site identified in the emerging Local Plan.

As the Planning Statement notes, Government Policy relating to motorways and trunk roads is set out in the Department for Transport Circular 02/2013 (The Strategic Road Network and the Delivery of Sustainable Development). Paragraph B6 recommends that the maximum distance between MSA’s should be no more than 28 Miles.

On the north and west sector of the M25 there are currently two MSAs: Cobham between junctions 9 & 10 and South Mimms at junction 23. The distance between the two is a little over 42 miles. Ideally, to comply with the distances between MSAs in Circular 02/2013 there should be a further MSA between the two. The halfway point (21 miles) coincides almost exactly with Junction 16. Junction 17 (Maple Cross) is 16.5 miles from South Mimms and 25.5 from Cobham.

The proposed MOTO site at Junction 20 is 10.5 miles from South Mimms and 31.5 from Cobham. There are also services (including fuel, shops, cafés and an hotel) immediately off the M25 at Junction 22 (Colney Fields). (7.5 miles from the MOTO site.)

A possible site, currently being used for HS2 preparatory work, exists between Junctions 16 and 17. EXTRA are currently carrying out a public consultation on the use of this site as a MSA in preparation for an application to Chiltern District Council. The Alternative Sites Assessment and the Planning Statement accompanying the MOTO application dismisses this site as “*heavily constrained and unlikely to come forward in the short term to meet the urgent need for an MSA.*”, though we must assume that is not EXTRA’s view.

The DOT’s view in Circular 02/2013 is that “*On-line (between junctions) service areas are considered to be more accessible to road users and as a result are more attractive and conducive to encouraging drivers to stop and take a break. They also avoid the creation of any increase in traffic demand at existing junctions.*” The EXTRA proposal is for an on-line MSA. The MOTO proposal is for an off-line one at an existing junction.

Consequently, given that Junction 17 at 25.5 miles from Cobham, is below the Circular 02/2013 recommended 28 miles maximum and Junction 20 at 31.5 is over the maximum, it must be assumed that meeting the distance requirement was not MOTO’s main criterion. Nor was meeting the DOT preference for on-line MSAs.

In terms of impact on local business and employment, in the immediate vicinity of Junction 20 there are service stations on the A41 and at Hunton Bridge, a hotel in Kings Langley, 3 minutes from the junction, and another at Apsley. There are plenty of coffee shops and local shops in Kings Langley and Abbots Langley, all of which are less than 5 minutes from the proposed development. These would be adversely impacted by the construction of the MSA. As mentioned above, the facilities at Colney Fields, 7.5 miles from the MOTO site, are virtually identical to those proposed in this application and they, too, would be affected. Consequently it is hard to justify that the proposal is meeting the needs of Circular 02/2013, or, given the close proximity of similar facilities that the national or local economic interests of the scheme would outweigh Green Belt planning controls.

Turning to other aspects of the proposal:

The development will inevitably have an impact on biodiversity. The Herts and Middlesex Wildlife Trust have submitted a full and cogent response on this point and we will not repeat the arguments here. The mitigation measures which the applicant proposes are neither measurable nor definitively described. In other words they are aspirational.

The same can be said of the impact on the local road network. The statement at para 9.6.3 of the Planning Statement that “*the proposed Kings Langley MSA is not predicted to significantly increase traffic flows on local roads, as users of the site will mainly comprise users of the existing motorway network*” is naive. In contrast, para 6.3 of the Transport Assessment acknowledges that “*the proposals would result in an increase in turning movements at Junction 20 of the M25, an increase in merge/diverge movements on the M25*”

*mainline and an increase in flows on the A41 Watford Road, from which the MSA will be accessed.”*

The roads serving and in the vicinity of the Junction 20 are already congested and become grid-locked at peak times. This is common knowledge to anyone who uses the junction. The proposals for an off-line MSA would exacerbate that congestion, as pointed out by Circular 02/2013 quoted above.

However, it is decided that *“Given the proposed development will predominately serve vehicles travelling along the M25, the assessment is focused on the A41/M25 signalised roundabout junction.”* (para. 6.7). In addition it is concluded that it is appropriate that *“the use of Cobham as a comparable service station, on which to establish turn-in proportions, is considered robust.”* (para. 6.39). But Cobham is an on-line MSA, not an off-line one and not impacted by, or impacting on, local roads. While we are not in a position to challenge the estimated peak hour extra vehicle movements to and from the proposed MSA, they appear low and do not seem to justify the 1,000 parking spaces provided, unless the applicant is anticipating an increase in those movements in the future.

The Transport Assessment does not appear to have taken into account the potential impact of wider proposals for the Junction 20 catchment area, focussing only on the traffic generated by the motorway itself. The South West Herts Growth and Transport Plan includes a park and ride hub near Kings Langley station, including a new link road to the A4251. Developers have also put forward proposals for 2,500 new homes along the Grand Union Canal corridor, 1,800 at Wayside Farm and several hundred on either side of the A4251. If implemented, all of these will generate additional traffic movements on the roads accessing Junction 20.

In terms of sustainability, there is no explanation of how this proposal is reconciled with the Government’s intent to phase out sales of petrol and diesel cars and vans by 2040. As currently presented, this application will result in increased pollution. There is no reference to the transition from oil based fuel to electric or how that will impact on this MSA. The charging of electric vehicles takes a substantially longer time than filling up with petrol. Consequently there will be an impact on the number of cars present on the site and the demand for electricity. It does not appear that the necessary infrastructure has been anticipated in the application

For the reasons outlined above, this proposal is for an unnecessary MSA in an inappropriate location in the Green Belt and should be refused by the Council.

Yours sincerely,

David Irving