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Herts Landscape Service
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REF: 5/2023/1300
DATE: 11 SEPTEMBER 2023

Dear Case Officer,

REFERENCE: 5/2023/1300
PROPOSAL: Outline application (access sought only) - Construction of up to 53 dwellings with associated green infrastructure, drainage, all ancillary works and new junction off Ragged Hall Lane following demolition of 52 Ragged Hall Lane
ADDRESS: 52 And Land Rear Of 28-74 Ragged Hall Lane Chiswell Green St Albans Hertfordshire

Thank you for consulting the Herts landscape service on the above proposal. The following comments are given with regards to landscape matters in line with national and local policy requirements, British Standards, and industry accepted good practice guidance.

NATIONAL PLANNING POLICY FRAMEWORK¹

The National Planning Policy Framework² (NPPF) confirms that decisions should contribute to and enhance the natural environment by protecting and enhancing **valued landscapes**,³ and recognising the intrinsic character and beauty of the countryside.

Decisions should also ensure that new developments, are sympathetic to **local character** and history including the surrounding built environment and **landscape setting**, support healthy lifestyles through the provision of safe and accessible **green infrastructure** and an appropriate amount and mix of green and other **public space**, and are visually attractive as a result of good architecture, layout, and appropriate and **effective landscaping**.

¹ Note: The list of national and local policies and guidelines is not comprehensive, refer to the national planning policy framework, planning practice guidance, local development plan, and other relevant strategies and guidance documents for all relevant policies and guidelines

² Ministry of Housing, Communities and Local Government, July 2021

³ In a manner commensurate with their statutory status or identified quality in the development plan

The NPPF recognises that **trees** make an important contribution to the character and quality of urban environments and serves to ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the **long-term maintenance** of newly planted trees, and that existing trees are retained wherever possible.

LOCAL DEVELOPMENT PLAN

- Policy 1 Metropolitan Green Belt
- Policy 69 General Design and Layout
- Policy 70 Design and Layout of New Housing
- Policy 74 Landscaping and Tree Preservation
- Policy 75 Green Space within Settlements
- Policy 143A Watling Chase Community Forest

Design Advice Leaflet No.1 – Design and Layout of New Housing

LANDSCAPE CHARACTER ASSESSMENT, STRATEGY & GUIDELINES⁴

The site lies within landscape character area 10 St Stephen's Plateau.

A working farmed landscape of predominantly open arable fields which slopes from north-west to south-east. To the north several large mixed woodlands create a local sense of enclosure. Elsewhere hedgerows are sparse with few individual field trees. The settlement pattern is dispersed, connected by a series of narrow winding lanes. The historic land-use pattern is overlaid by a strong network of motorways and junctions. Wooded horizons are common to the north, west and south, whilst to the east the built edge of St Albans and Chiswell Green is prominent

The condition is assessed as Moderate and the strength of character is assessed as Weak, the overall strategy for managing change is to Improve and Reinforce.

Of relevance to the proposed development the guidelines for managing change include:

- *Support the Watling Chase Community Forest in the realisation of its objectives for the area.*
- *Promote hedgerow restoration and creation throughout the area to provide visual and ecological links between existing and proposed woodland areas. Pattern to follow historic field boundaries where possible.*
- *Promote the creation of a network of new woodlands in the open arable landscape, particularly with a view to visually integrating the intrusive motorways and existing urban fringe development. Develop a mix of medium to large woods near the motorways and urban areas (developing the existing pattern to the north) and also smaller copses linking with hedgerow restoration on the open arable areas, emphasising topographical variation.*
- *Broaden the range of recreational opportunities.*
- *Ensure all existing and proposed recreational land uses include appropriate measures to manage and enhance the existing landscape setting and historical and ecological value. Particular attention should be given to ensure earthwork proposals complement natural landform patterns.*

⁴ Landscape Character Assessment and Guidelines for Southern Hertfordshire, The Landscape Partnership 2001

DOCUMENTS FOR APPROVAL

- Site Location Plan prepared by Scene Architects, Ref:01.001 Rev P01
- Land Use Parameter Plan, Ref:01.111 Rev P01
- Density Parameter Plan prepared by Scene Architects, Ref:01.112 Rev P00
- Movement Parameter Plan prepared by Scene Architects, Ref:01.115 Rev P01
- Access Plan prepared by Markides, Ref:23149-MA-XX-DR-C-001 P01

ACCESS

The approach to landscaping along the proposed access is not clear.

The Design and Access Statement (DAS) (3.1) states that it will be a *'landscaped corridor of retained and proposed trees. A singular 3m combined pedestrian & cycle route will be located on the eastern side of the access road, in order to create landscape buffers between the access road and the existing gardens of 50 & 54 Ragged Hall Lane.'*

The Landscape and Visual Impact Assessment (LVIA) (illustrative Photomontage Viewpoint 13) shows an access road, with grass verges, hedgerows, and tree planting on either side.

As summarised above, the DAS and LVIA propose that the access road will be relatively well landscaped, including grass verges, existing trees and new hedgerow and tree planting.

However, the Arboricultural Impact Assessment (AIA) shows that all of the existing trees will be removed - 10 no. trees comprising 9 no, Category C⁵ trees, and 1 no. Category B⁶ tree.

Furthermore, the Proposed Access Arrangement Plan (for approval) only shows grass verges, which appear very narrow to non-existent in places and raises strong concerns over the lack of space and the ability to realistically provide any meaningful landscaping along here.

It is advised that landscaping along here is important to provide landscape and visual mitigation, conserving the well landscaped character and attractive visual amenity of Ragged Hall Lane, as well as providing noise and air pollution mitigation.

CHARACTER ANALYSIS

The DAS provides a local character analysis; however this appears to focus entirely on architecture and built form. It is advised that an analysis of open space (and its relationship with built form) is equally important to local character. A key design principle of the scheme is to create a development that *'acts as a small extension to Ragged Hall Lane'* it would therefore be appropriate to explore how the character of Ragged Hall Lane that includes wide grass verges and trees is carried through into the extension.

DEVELOPMENT PARAMETERS

LANDUSE PARAMETER PLAN

The DAS confirm that the development is supported by open space and landscaping – this should be added to the plan key as being provided with the 'development zone' to make it clear that the zone will include strategic **green infrastructure and open space** and the **Local Area of Play (LAP)** -

⁵ Category C – Trees of low quality with an estimated remaining life expectancy of at least 10 years

⁶ Category B – Trees of moderate quality with an estimated remaining life expectancy of at least 20 years

The DAS (3.1) refers to an orchard as a welcoming arrival feature, whilst the provision of a high-quality arrival space is supported in principle, it is queried if an orchard is the right approach here. The arrival space should be secured on the parameter plans and it is suggested that it could link in with the strategic green corridor (see comments below).

The **landscape buffers** shown to the northern eastern and southern boundaries, although shown on the plan at various widths, are noted as 2m wide in the key.

This is not consistent with LPAs pre-app advice that requested a 10m landscape buffer along the northern site boundary (DAS 2.2) – it would be beneficial to understand why.

2m is extremely narrow and will not support the density of structural planting to provide effective mitigation.

In order to deliver the vision for a truly landscape led scheme - the existing tree's root protection areas and canopy spread (as identified in the arboricultural report) should be shown on the parameter plans and included in the landscape buffers to ensure their protection and long-term health.

There is no **green infrastructure** shown along the access road – see further comments in relation to the access.

There is no **green corridor** shown along the existing PROW (as promoted in DAS 2.3).

Streets should be tree lined in line with National Planning Policy Framework.

In order to meet the vision for a truly sustainable scheme – there is an opportunity to extend the green corridor for pedestrians cycles throughout the site linking with public open space.

The **public open space** provision appears to be located in the left-over spaces and lacks connectivity and clarity of function and character. A more integrated network of GI and OS is required.

There is strong concern for the largest open space that is dominated by a SuDS attenuation basin and is of no benefit to wildlife or people for recreation or play. The DAS suggests that the SuDS basin will be an attractive feature with habitats for wildlife, however the Flood Risk Assessment appears to confirm that it will need to be maintained as a bare and empty grassland depression. The SuDS basin should not be considered as public open space and requires further consideration – the safety of the Lap and SUDS basin in such close proximity also needs addressing. .

SUMMARY & CONCLUSION

- Overall there is concern that the parameter plans currently do not provide sufficient information to secure the delivery of high-quality green infrastructure, open space and landscaping throughout the development – as discussed above.

Yours sincerely,
Jennifer Owen
Landscape Team Leader
Herts LEADS (Landscape Ecology Archaeology Design Sustainability)