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TEL: 01992 555205
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REF: 5/2023/1300
DATE: 25 OCTOBER 2023

Dear ██████████ ,

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.

PREVIOUS LANDSCAPE COMMENTS

- PRE/2022/0141 – landscape advice dated 07 November 2022
- 5/2023/1300/OUT – landscape advice dated 11 September 2023

DOCS & ADDITIONAL INFORMATION

- Landscape & Visual Impact Assessment, David Jarvis Associates, Friday 16th June 2023
- Design & Access Statement – Doc 3, Scene, 1935
- Land Use Parameter Plan, RHLSA-SCN-XX-XX-DR-A-01.111-A3, Rev P02
- Proposed Illustrative Site Layout, RHLSA-SCN-XX-XX-DR-A-01.110-A3, Rev P04

LANDSCAPE & VISUAL IMPACT ASSESSMENT¹

- At the pre-application stage concerns were raised for the adverse landscape and visual effects of the proposals, including the access, and a landscape and visual impact assessment was requested and consequently submitted.

LANDSCAPE EFFECTS

- The LVIA concludes that *‘The greatest landscape effects would generally be contained within the application site. Any wider effects would be geographically limited to the immediate area around the site.’*

Whilst it is agreed that the greatest landscape effects are likely to be experienced within the site boundary, there is concern that the impact of the development on the immediate area around the site, including the settlement pattern established along Ragged all Lane and the setting of Westfield farm have not been fully assessed.

There remains concern that, as raised at the pre-application stage, the proposed development results in the extension of the settlement edge northwards, beyond the established pattern of ribbon development (one property width) along the northern side of Ragged Hal Lane, encroaching into the open gap between the A414 and St Albans beyond. In addition, the proposed development results in the coalescence of the settlement edge with Westfield Farm. The site currently makes a positive contribution to the open and rural setting of the farm complex, and this will be permanently change to a suburban setting.

VISUAL EFFECTS

- The LVIA concludes that *‘The proposed development would be screened from view from many of the viewpoints assessed. The majority of those viewpoints where the proposed development would be geographically limited, and would be within , on the boundary or in close proximity to the site. No effect on long distance views predicted. Visibility of the development would diminish over time with the growth of the mitigation planting and tree within the site. With suitable mitigation in place it is considered that the site can be developed without undue adverse effects on the wider landscape.’*

This conclusion is broadly supported – providing that appropriate mitigation measures can be delivered as discussed in more detail below. The assessment demonstrates that the wider area from which the proposed development is visible is limited. Views from the north are generally effectively screened by the vegetated A414 corridor and sloping landform. The majority of views from the east and west are generally screened by established vegetation in the foreground, and where there are views, they tend to be glimpses of rooftops.

The most significant views are from along Ragged Hall Lane that passes the site to the south, and from along the public rights of way that passes through the site and neighbouring Westfield Farm (represented by viewpoints 10,11,13,14,16). However it is suggested that these views can mitigated to an acceptable level with the delivery of

¹ Comments are given in line with Guidelines for Landscape and Visual Impact Assessment Third edition,¹ Landscape Institute and Institute of Environmental management and Assessment (GLVIA3)

appropriate strategic planting along the site boundaries and throughout the development – in line with comments below.

ACCESS

- At the pre-application and initial outline stages concerns were raised for the treatment of the proposed access as a “*landscaped corridor*,” and the lack of space to realistically deliver any meaningful landscaping along here.

The Design & Access Statement (DAS) and Illustrative Site Layout (ISL) confirms that it is proposed to provide trees along the western side of the access. This is supported in principle however again there is concern for the availability of space.

The width of the space available for tree planting appears to be between 1m and 2m and is therefore very tight. The encroachment of the maturing tree canopies into the highway conflicting with high sided vehicles, and the encroachment of the canopies and overshadowing of the neighbouring garden are key concerns. With this in mind it is advised that it will only be feasible to provide a limited number of fastigate specimens along here that will provide some visual amenity but will not provide any notable noise and air pollution mitigation.

The tree planting corridor should be shown on the Land Use Parameter Plan in order to secure its delivery.

DESIGN & ACCESS STATEMENT - CHARACTER ANALYSIS

- This comment was raised at the initial outline stage and remains relevant - 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.

LANDUSE PARAMETER PLAN

Several development/landscape parameters are set out in the DAS as summarised below and discussed in more detail:

- 10 m landscaping buffer to western site boundary with green belt.
 - 3 m landscaping buffer between proposed and existing dwellings along Ragged Hall Lane
 - Orchard feature at arrival
 - Landscape amenity areas – orchards and meadows for open space
 - LAP
 - Drainage basin
- The plan has been updated to clarify that the ‘development zone’ includes ‘strategic green infrastructure & open space & LAP’ – this is welcomed.

LANDSCAPE BUFFERS

- The 10 m landscaping buffer to western site boundary is fully supported in principle.
- The key has been updated to indicate 3 m (previously 2 m) landscape buffers to the northern, eastern, and southern site boundaries. However the landscape buffer along the eastern boundary is shown as much wider than this on the plan – the proposed width here therefore needs to be confirmed. The DAS shows this boundary as 'buffer planting' for 'structural screening,' however this is not carried forward onto the ISL which shows this boundary as predominantly grassland with one or two trees that will provide limited screening.

As previously raised in the landscape comments, 3 m is not consistent with LPAs pre-app advice that requested a 10 m landscape buffer along the northern site boundary (DAS 2.2) – it would be beneficial to understand why this has not need delivered.

Overall 3 m is considered too narrow to achieve a decent layering of structural planting to deliver a level of visual mitigation along the boundaries and need to be a minimum 5 m.

- This comment was raised at the initial outline stage, has not been addressed and therefore remains relevant - 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.

ORCHARD

- As raised at the initial outline stage - 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.

Orchards require specific management measures, including the removal of fallen fruit for health and safety, and harvesting and storage of fruit etc. They are often most successful where there is a willing community to take on an active management role. Strongly advise that an alternative approach is taken here.

- The arrival space has been added to the Parameter Plan – this is welcomed. However it is not clear how this links with any strategic green movement routes that should permeate the site

SUDS

- The DAS refers to the drainage basin as 'open space.' It should be understood that this feature is not a genuinely usable public open space. It is shown on the ISL as holding water, however in reality it will need to remain as an empty grass depression in order to accommodate flood events.
- The DAS refers to rain gardens and includes images that show generous planting blocks set within wide verges. It is not clear where the space has been allocated for these.

OUTSTANDING ISSUES

The following comments were raised at the pre-application and initial outline stages and remain relevant:

- The retention of Public Right of Way (St Michael Rural 010) within the development is supported in principle. However there is concern for the potentially poor character and amenity of this route which appears as a typical highway pavement. It is advised that the opportunity for a segregated or more distinct 'green corridor' should be explored, to include pedestrian priority crossing of any highways.
- 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. - The character and function of the three proposed communal open space types is not clear. In particular the northern most space is remote from the community it serves. All spaces are currently poorly enclosed by built form or landscaping and are not well overlooked and therefore lack passive surveillance for security. How are the public open spaces connected and accessed by movement corridors (pedestrian and cycle routes?)
- Streets should be tree lined in line with National Planning Policy Framework - Open spaces and streets should accommodate individual and groups of large-scale native trees with a mature tree canopy in order to enhance the character and amenity of the urban area, softening large expanses of hard surfacing and the dominance of built form, as well as providing multiple environmental benefits (e.g. regulation of the microclimate, biodiversity etc.). The LVIA refers to 'street trees and hedgerows within the development' as part of the mitigation strategy.
- There is no paved access to the front/rear of some properties, or patios indicated on the layout.

SUMMARY & CONCLUSION

- Overall, there remains concern for the landscape effects of the proposed development due to the extension of the settlement edge northwards, beyond the established pattern of ribbon development (one property width) along the northern side of Ragged Hal Lane, encroaching into the open gap between the A414 and St Albans beyond, and the setting of Westfield Farm.
- Whilst there have been some minor amendments to the submitted information since the pre-application and initial outline stages, the parameter plans and illustrative site layout do not go far enough to ensure 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)