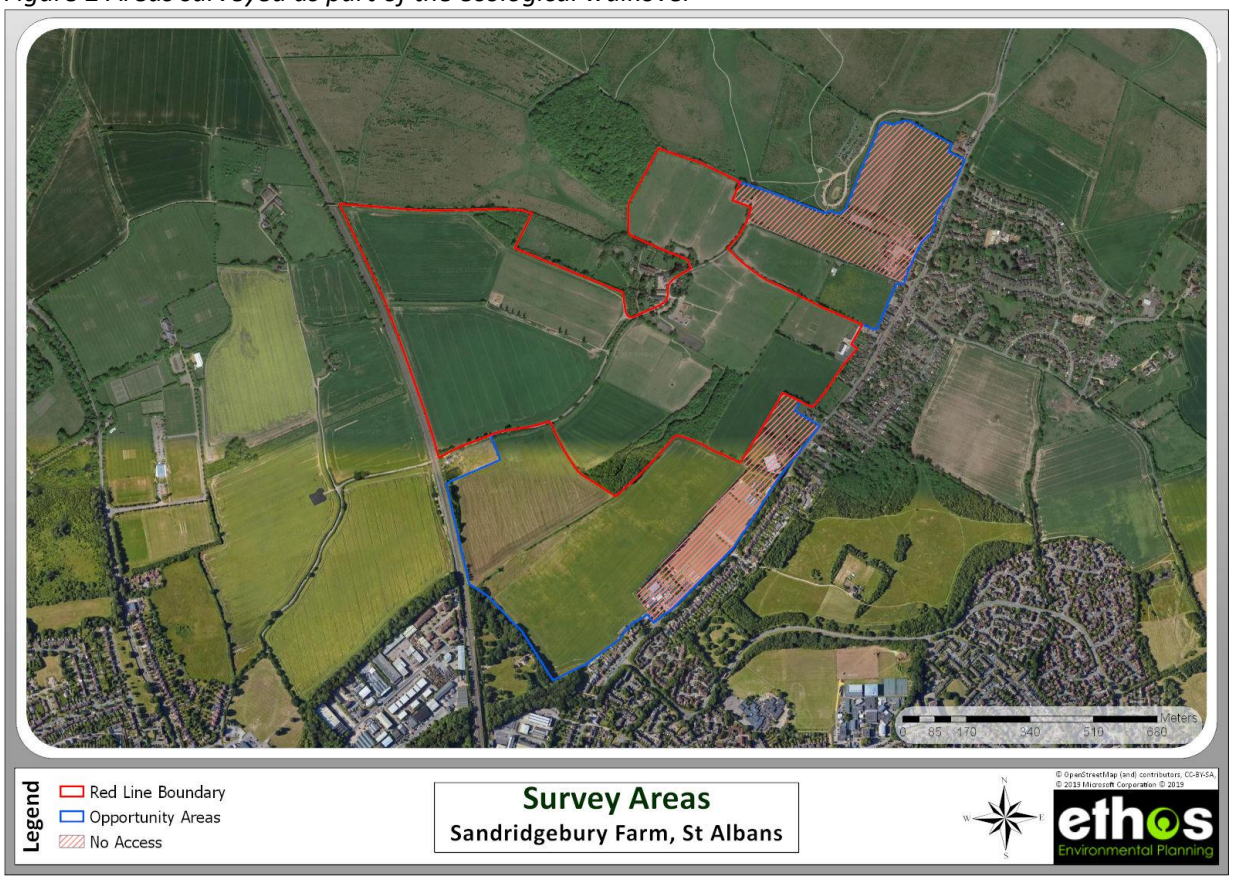
3 METHODOLOGY

3.1 Phase 1 Habitat Survey

The extended Phase 1 habitat survey and mapping has drawn on guidance provided in the *Handbook for Phase 1 Habitat Survey - a technique for environmental audit* (JNCC 2010). The extended Phase 1 habitat survey was undertaken on 17th October 2019. The survey incorporated detailed assessment of the land within the development boundary, including a description and mapping of all key features and habitat types. The survey was carried out to identify the range of habitats within the site and the predominant and notable species of flora.

The site was split into two areas; land under the ownership of Sandridgebury Farm and Opportunity Areas. Not all Opportunity Areas were able to be accessed for the walkover survey but were surveyed from adjacent land where possible. Land parcels where access was not possible are shown below in Figure 2.

Figure 2 Areas surveyed as part of the ecological walkover



3.2 Protected Species Surveys

3.2.1 NERC S. 41 mammals

The survey included an assessment of the habitats on site for their potential to support NERC Section 41 species such as hedgehog *(Erinaceus europaeus)*, polecat *(Mustela putorius)*, harvest mouse *(Micromys minutus)* and brown hare *(Lepus europaeus)*. This included a search for nests, runs, latrines, paw prints, and live specimens.

3.2.2 Badger

The survey for badger *(Meles meles)* included a search of the development site for any evidence of badgers, including the following:

- Faeces (dung pits): badgers usually deposit faeces in characteristic excavated pits, concentrations of which (latrine sites) are typically found at home-range boundaries;
- setts: comprising either single isolated holes or a series of holes likely to be interconnected underground;
- paths between setts or leading to feeding areas;
- scratching posts at the base of tree trunks;
- hair traces;
- snuffle holes (foraging), formed during foraging and comprising characteristically disturbed ground vegetation; and,
- footprints.

Where setts were identified, they were georeferenced using ArcGIS and plotted on maps, then activity levels were scored using the following criteria:

- number of well-used holes (with one or more of the features: well-worn entrance; freshly excavated soil; bedding material);
- number of partially used holes (leaves or twigs in entrance and/or mosses and other plants growing in or around entrance);
- number of disused holes (partially or completely blocked, with considerable amount of excavation required for reoccupation).

The field survey methods described above are consistent with those advocated by (Harris *et al*. 1989). As a guide to classifying each sett the following criteria is followed:

- **Main** – normally the focal sett for a badger social group. Generally always occupied, main setts usually have several well used holes with radiating tracks, latrines and other signs of activity. The actual number of holes can vary greatly, depending on social group size and soil conditions. Several holes with large spoil heaps and obvious paths emanating from and between sett entrances.

- **Annex** – a secondary sett, close to the main sett. Will normally be connected to the sett with very obvious tracks. Annexes may not be occupied constantly, even when the main sett is very active. Normally less than 150m from main sett, comprising several holes.
- **Subsidiary** – occurring at a greater distance from the main sett, and not as clearly linked to it as an annex. These setts will clearly fall within the territory of a social group and may be seasonally used by badgers; and
- **Outlier** – less frequently used, these setts may be colonised by other species when not in use by badgers. Outliers may represent a temporary sett, or a habitation for migrating individuals, or those excluded from a social group.

3.2.3 Hazel dormouse

The survey included an assessment of the potential of the site to support hazel dormouse *(Muscardinus avellanarius)*, focusing on the connectivity and suitability of the habitat on site.

3.2.4 Riparian mammals

The survey included an assessment of the potential of the site to support riparian mammals such as otter *(Lutra lutra)* and water vole *(Arvicola amphibious*).

3.2.5 Bats

The methodology for the bat survey has been informed by the Bat Conservation Trust *Bat Surveys Good Practice Guidelines 2016.* The habitats on site were assessed for their suitability for foraging and commuting bats and the potential for roosting bats.

3.2.6 Birds

The bird survey included an assessment of the habitats on site for their potential to support breeding birds. Surveyors were equipped with Barr and Stroud 8 x 42 binoculars and any bird species observed were recorded.

3.2.7 Reptiles

The potential presence of reptiles on site was assessed considering the habitats present (availability of refugia and basking areas) and suitability of surrounding environment. Where possible, attempts to confirm reptile presence on site were made following *Froglife Advice Sheet 10 – Surveying for Reptiles* through direct observation in reptile "hotspots" and checking of any existing refugia.

3.2.8 Amphibians

The habitats on site were assessed for their potential to support amphibian species, including great crested newt (*Triturus cristatus)* (GCN). Surveys for GCN were informed by the *Great Crested Newt Conservation Handbook,* Froglife, 2001. The site was examined for suitable

waterbodies and for breeding terrestrial habitat. Terrestrial habitats providing sufficiently structured vegetation in which amphibians may forage or hibernate over winter were also surveyed for.

In addition to the on-site assessment, *Great Crested Newt Mitigation Guidelines* (English Nature, 2001) recommend that a desktop analysis of ponds within 500m of the site be undertaken, to identify any potential breeding ponds which may require further survey. Ponds within 500m of the site were mapped on GIS with an OS OpenData base map at 1:10,000 resolution.

3.2.9 Invertebrates

Due to the many invertebrate taxonomic groups that exist, the often-large differences in invertebrate diversity between habitats and the many survey techniques available, invertebrate surveys are highly specific to individual sites. Therefore, an assessment of the potential site for invertebrates was undertaken, including the need for targeted surveys.

3.3 Personnel

The surveyors on site are included within Table 1. The survey team have worked together on numerous similar projects and have a complimentary range of skills and experience which are considered to have provided a robust ecological appraisal of the site.

Table 1 Surveyors on site

Ecologist	Position	Qualification/Licence	Experience
Matt Attrill	Ecologist	BSc (Hons), Grad CIEEM Class 2 Bat Licence Class 1 GCN Licence	Matt is a highly experienced field surveyor with over six years' ecological experience. Matt is competent in surveying for a wide variety of wildlife and has gained experience from both the commercial and voluntary sectors.
Stephanie Green	Ecologist	MSc BSc (Hons), MCIEEM Class 1 GCN Licence Class 1 Hazel Dormouse Licence	Steph has over six years' experience in ecological field survey and consultancy. Steph is responsible for undertaking comprehensive habitat assessments, protected species surveys and is a licensed GCN and dormouse worker.

3.4 Limitations

Fields F1, F2 and F5 (shown on Figure 3 below) contained horses and were not accessed for safety reasons. This is not considered a significant limitation of the assessment as the fields contained a heavily grazed short sward of improved grassland and were unlikely to support protected and notable species. The hedgerows and woodland edges around these fields were

accessed and subject to ecological assessment; these areas are considered to be the most likely to support protected and notable species.

The ecological walkover survey was carried out inside of the optimal survey period (April to October) for identifying flora.

There are considered to be no significant limitations of the assessment.

4 PHASE 1 HABITAT SURVEY

4.1 General Site Description

The site comprised several large arable fields and improved grassland fields that were currently in use as horse grazing pasture. The fields were intersected by hedgerows ranging from species-rich with trees to species-poor defunct. There were two areas of plantation woodland on the site; one small copse along the northern boundary and a larger area along the southern red line boundary. The site also contained an area of amenity grassland in use as a sports field with an associated clubhouse building. There were small areas of bare ground, ruderal herbs and hard standing in the centre of the site and two lines of trees around the riding stables car park and riding yard.

Langley Wood is an area of ancient semi-natural woodland adjacent to the northern boundary of the site which comprised mainly hornbeam. The remainder of the northern boundary of the site bordered areas of grassland and the stable yard which formed Sandridgebury Livery Stables. The western boundary of the site bordered a major railway line into St Albans and London and the southern and eastern boundaries of the site bordered St Albans and Sandridge, respectively.

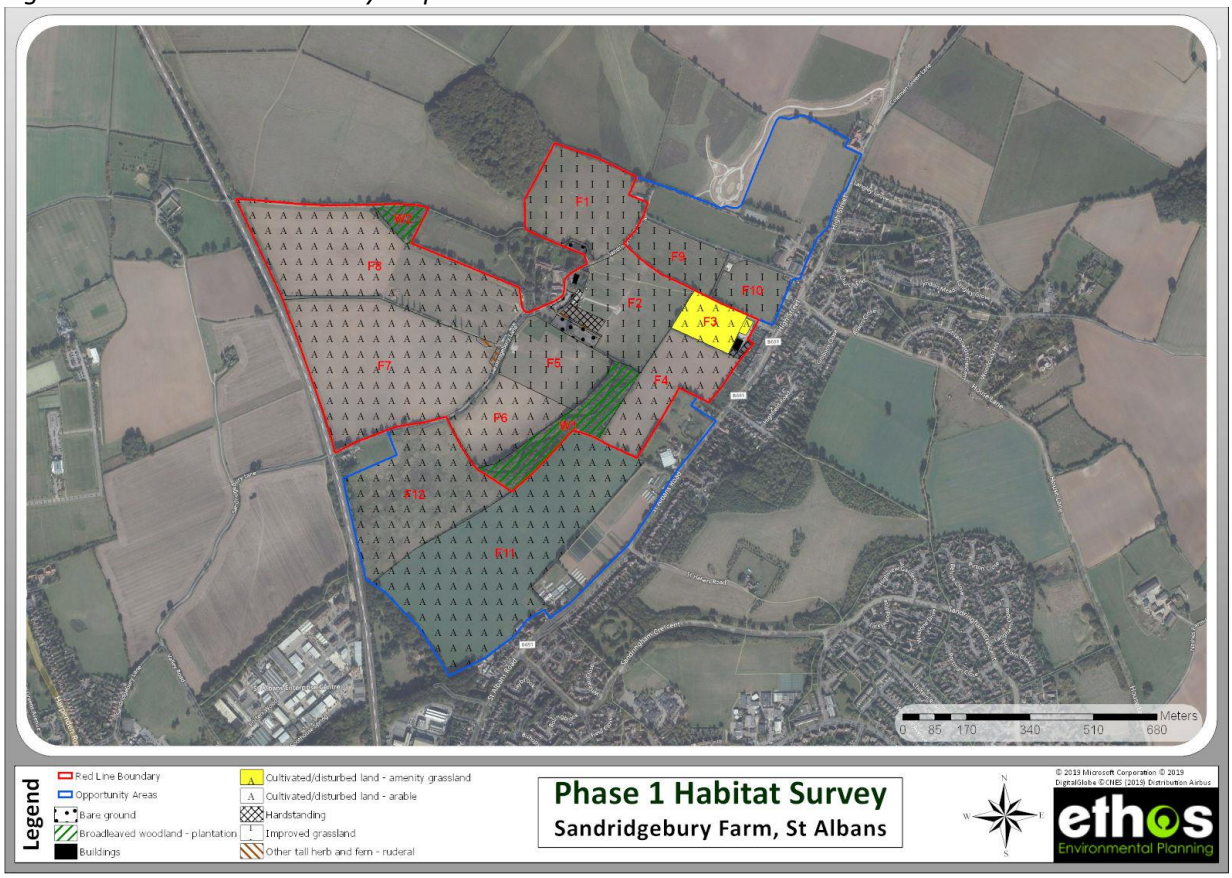
Across the wider landscape, areas to the north, west and east of the site were mainly rural with small villages surrounded by large areas of grassland and woodland. There were several golf courses north of the site within Harpenden and Wheathampstead. St Albans was located to the south of the site.

4.2 Habitat Description

Figure 3 shows the key habitats using the Phase 1 habitat classifications. The key features described within this section are:

- Improved grassland (B4);
- Cultivated/disturbed land – arable (J1.1);
- Cultivated/disturbed land – amenity grassland (J1.2);
- Broadleaved woodland – plantation (A1.1.2)
- Other tall herb and fern – ruderal (C3.1);
- Bare ground (J4);
- Hard standing;
- Buildings (J3.6); and
- Hedgerows (J2).

Figure 3 Phase 1 Habitat survey map



4.2.1 Improved grassland (B4)

The majority of improved grassland fields were heavily horse grazed and contained limited ecological value. Species included Yorkshire fog (*Holcus lanatus*), perennial rye-grass (*Lolium perenne*), common dandelion (*Taraxacum officinale*) and broadleaf plantain (*Plantago major*).

Photo 1 Field F1

Photo 2 Field F2

4.2.2 Cultivated/disturbed land – arable (J1.1)

Several of the large fields, in particular in the west of the site, were currently used for arable purposes. The fields contained very little vegetation and were assessed to have limited ecological value.

Photo 3 F11

Photo 4 F12

4.2.3 Cultivated/disturbed land – amenity grassland (J1.2)

Field F3 was an area of amenity grassland currently used as a sports ground. F3 was mown short and held little ecological value. There was a small area of grassland adjacent to the eastern edge of F3 which was a playground.

Photo 5 F3

Photo 6 Playground adjacent to F3

4.2.4 Broadleaved woodland – plantation (A1.1.2)

There were two areas of broadleaved plantation woodland on the site; a small section along the northern boundary (W2) and a larger section along the southern edge of the red line boundary (W1). Both woodlands were approximately 20 to 30 years old and had obvious planting lines. Species included hornbeam (*Carpinus betulus*), oak (*Quercus* spp.), field maple

(*Acer campestre*), wild cherry (*Prunus avium*), hawthorn (*Crataegus monogyna*), hazel (*Corylus avellana*), goat willow (*Salix caprea*), ash (*Fraxinus excelsior*), dogwood (*Cornus sanguinea*) and silver birch (*Betula pendula*). Both W1 and W2 had a limited ground flora due to dense canopy shading.

Photo 7 W1

Photo 8 W2

4.2.5 Other tall herb and fern – ruderal (C3.1)

There were small areas of ruderal herbs between fields F7 and F7 and also adjacent to the livery stables car park. Species included marsh thistle (*Cirsium palustre*), common mallow (*Malva sylvestris*), ribwort plantain (*Plantago lanceolata*), butterbur (*Petasites hybridus*) and broadleaf dock.

4.2.6 Bare ground (J4)

There were areas of bare ground in the centre of the site which formed the livery stables car park, track into field F2 and riding lesson areas.

4.2.7 Hard standing

There was an area of hard standing in the centre of the red line boundary site which was used as a farm store.

4.2.8 Buildings (J3.6)

There were two buildings on site and several additional stable buildings adjacent to the site. These buildings are described further in Section 5.5 below.

4.2.9 Hedgerows

A total of 19 hedgerows were identified across the site. The hedgerows varied in structure and species composition and are described below in Table 2 and shown in Figure 4.

Table 2 Hedgerows on site

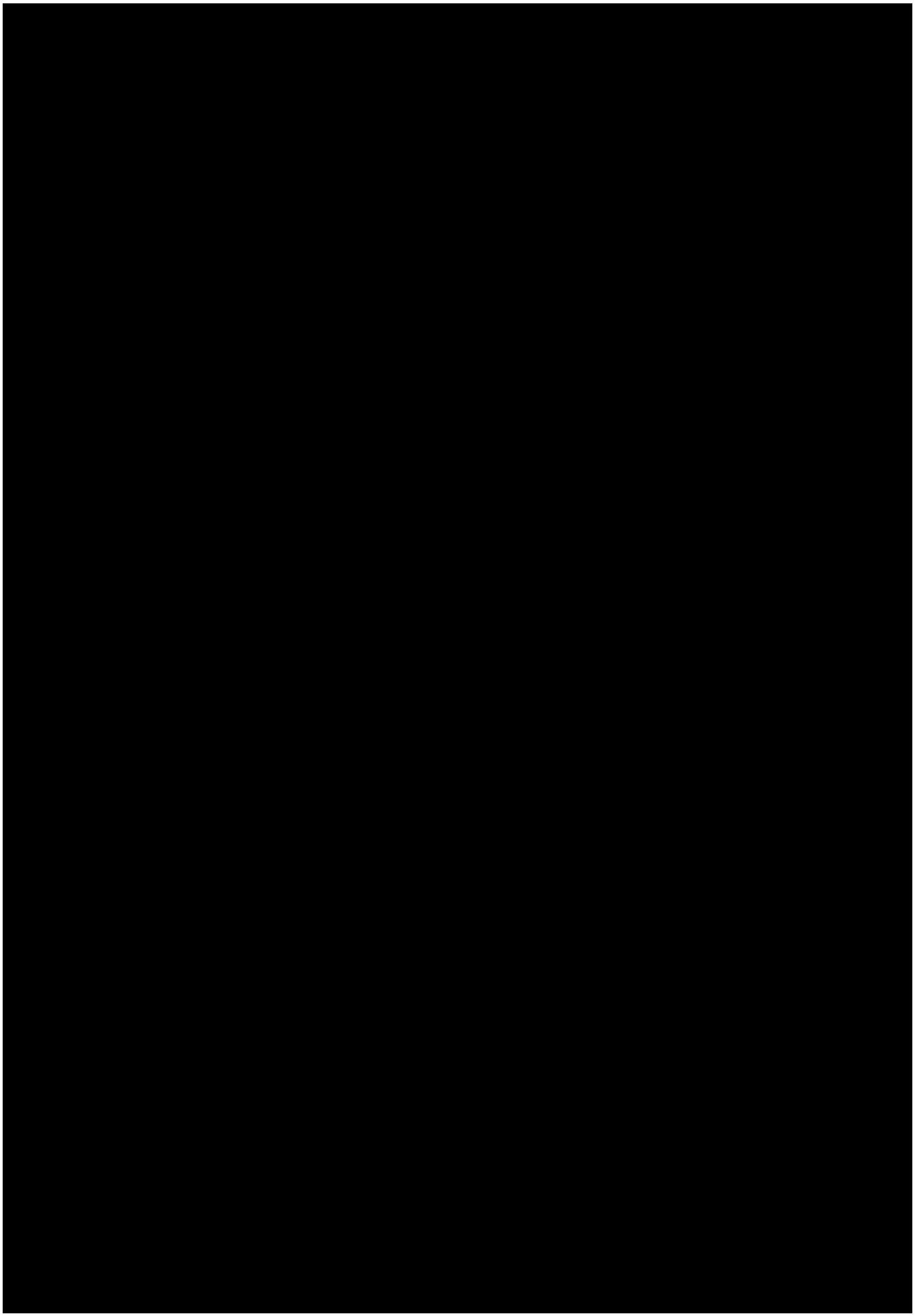
Hedgerow Number	Classification
H1	Intact hedge – native species-poor
H2	Hedge with trees – native species-rich
H3	Hedge with trees – species-poor
H4	Hedge with trees – native species-rich
H5	Defunct hedge – species-poor
H6	Hedge with trees – native species-rich
H7	Hedge with trees – species-poor
H8	Intact hedge – species-poor
H9	Hedge with trees – species-poor
H10	Hedge with trees – species-poor
H11	Defunct hedge – species-poor
H12	Intact hedge – species-poor
H13	Hedge with trees – species-poor
H14	Defunct hedge – species-poor
H15	Hedge with trees – species-poor
H16	Intact hedge – species-poor
H17	Defunct hedge – species-poor
H18	Hedge with trees – native species-rich
H19	Intact hedge – species-poor

Figure 4 Hedgerow survey map

5 ASSESSMENT FOR PROTECTED SPECIES

5.1 NERC S41 Mammals

Although no NERC S41 mammals were identified during the ecological walkover survey, the site was considered suitable to support brown hare as it contained large areas of farmland with areas of woodland.



5.3 Hazel Dormouse

The site contained several good quality hedgerows and two areas of woodland which contained a diverse range of species, including several of which are known to be important food sources for dormice including hazel, ash, oak, sweet chestnut, blackthorn and hornbeam. There is the potential for dormice to be present across the site within the hedgerows and woodland habitats.

5.4 Riparian Mammals

There were no areas of riparian habitat on or adjacent to the site and therefore no habitat suitable for otter or water vole. Both species are considered likely absent from the site.

5.5 Bats

The majority of the site comprised improved grassland and arable farmland, both of which were considered poor quality habitats for bats. The woodlands and hedgerows would provide good quality foraging and commuting habitat and were well-connected to other hedgerows and woodland in the wider landscape. These habitats were likely to be an important resource for bats.

As the woodlands W1 and W2 were estimated to be 20-30 years old, they were considered unlikely to support roosting bats as the trees were unlikely to have developed suitable roost features (e.g. cavities and cracks). However, the adjacent Langley Wood to the north of the site was ancient semi-natural woodland and was likely to contain trees with suitable roost features.

There was a brick-built house (Photo 9) which was located within the site boundary adjacent to the livery stables and a sports centre (Photo 10) on the eastern boundary of the site adjacent to field F3. There were also several stable and farm buildings (Photo 11 and 12) which formed part of the livery stables. These buildings have the potential to support roosting bats.

Photo 9 brick-built house

Photo 10 Sports centre building

Photo 11 Stable buildings adjacent to the site boundary

Photo 12 Stable buildings adjacent to the site boundary

5.6 Birds

The woodland and hedgerows were assessed to be the most important habitats for birds on the site. The improved grassland and arable fields were poor-quality habitat for birds. Several common and widespread species were seen during the ecological walkover survey including Eurasian jay (*Garrulus glandarius*), greater-spotted woodpecker (*Dendrocopus major*), nuthatch (*Sitta europaea*), blue tit (*Cyanistes caeruleus*), carrion crow (*Corvus corone*), great tit (), chaffinch (*Parus major*) and blackbird (*Turdus merula*).

5.7 Reptiles

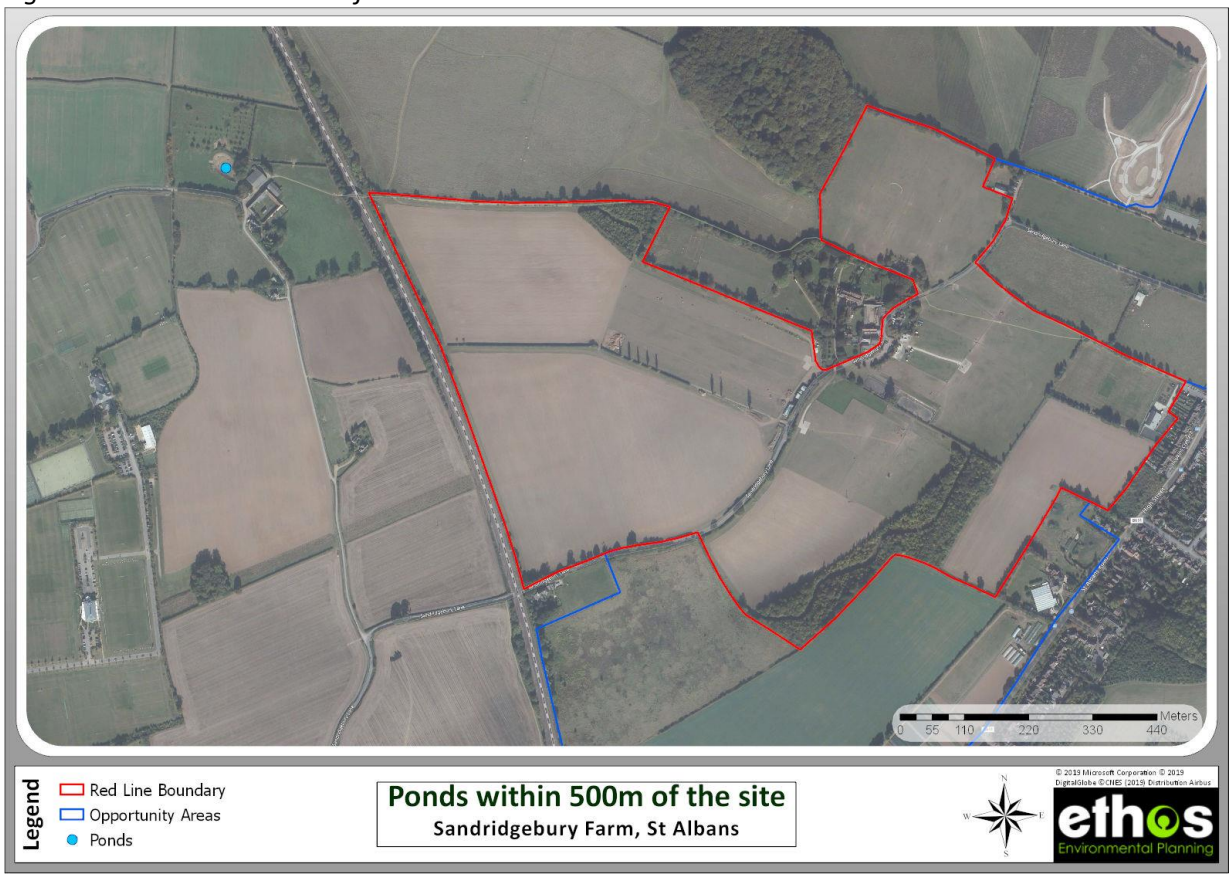
The site was largely unsuitable for reptiles. The improved grassland fields contained a short sward with no suitable cover for reptiles and the arable fields contained very limited amounts of vegetation. The woodlands were dense and did not contain open areas such as glades which would provide basking areas for reptiles. Both areas of woodland did contain a ride through the middle, however these areas were narrow and sparsely vegetated. There was some potential for reptiles within the hedgerow bases, in particular the species-rich hedgerows with a diverse ground flora.

5.8 Amphibians

There were no waterbodies on the site and therefore no suitable breeding habitat for GCN and other amphibians. As the site mainly comprised large areas of arable land and improved grassland, there was also limited suitable terrestrial habitat for GCN on the site. The woodland and hedgerows would provide suitable terrestrial habitat for GCN both during their active period and for hibernation.

The desk-based assessment of ponds within 500m of the site identified a single pond to the north west of the site, approximately 260m from the site boundary. The pond (shown in Figure 6) was located to the west of the large operational railway line which ran down the western boundary of the site. This railway line is considered a major barrier to GCN due to its large size and high activity. GCN potentially within this pond are considered highly unlikely to be present on the site and therefore they are not considered further in this assessment.

Figure 6 Ponds within 500m of the site



5.9 Invertebrates

The majority of the site contained large areas of arable land and improved grassland, both of which were considered to be poor quality habitats for invertebrates. The woodlands and hedgerows were assessed to be the most important habitats for invertebrates.

6 RECOMMENDATIONS

6.1 Further Surveys

- **Hazel Dormouse:** The hedgerows and woodland were considered suitable to support dormice and further presence/absence surveys are recommended. Surveys would comprise nest tube searches carried out between April and November and enough survey checks should be carried out to achieve the minimum survey score of 20 (as detailed in the *Dormouse Conservation Handbook,* English Nature 2006.
- **Bats**: Further surveys for bats are recommended in the form of:
  - Activity transect surveys across the site supplemented by static detector surveys.
  - Ground roost assessment surveys of suitable mature trees likely to be impacted (either directly through removal or indirectly through lighting impacts or removal of nearby habitat) by future development proposals to identify features suitable for roosting bats.
  - External and internal building inspections of buildings on and adjacent to the site that are likely to be impacted by future development proposals to identify features suitable for roosting bats.
  - Any trees/buildings likely to be impacted by future development proposals should be subject to emergence/re-entry surveys. Alternatively, trees can be subject to aerial inspection surveys to inspect features suitable for roosting bats.
- **Hedgerows**: Further hedgerow assessment surveys are recommended to identify hedgerows classified as 'important' under the Hedgerow Regulations 1997. 'Important' hedgerows should be retained where possible.
- **Land not currently accessible**: The land parcels within the Opportunity Areas which have not been assessed as part of this constraints report should be subject to an ecological walkover survey to identify potential ecological constraints. Both the northern and south eastern land parcels that were inaccessible contain buildings that may be suitable for roosting bats; these areas should be subject to assessment. There is also an additional area of woodland adjacent to the south west Opportunity Area boundary which may support roosting bats, badgers and dormouse.

6.2 Habitats

On-site woodland and hedgerows
The woodland and hedgerows were assessed to be the most valuable habitats on site and should be retained and buffered where possible, as shown in Figure 7.

As the woodlands are currently lacking a good shrub layer and ground flora due to heavy canopy shading, there is the opportunity to enhance these areas through clearing some of the younger specimens to create woodland glades and rides. This would open the canopy and create suitable areas of habitat for several species including reptiles, invertebrates and foraging bats. Areas of cleared habitat could be retained on site where possible as log piles, which would provide habitat for invertebrates, hedgehog and reptiles.

The species-poor defunct hedgerows can be improved through infill-planting with suitable native tree and shrub species to improve the structure and species diversity of the hedges.

Adjacent ancient woodland

Langley Wood is an important area of ancient semi-natural woodland adjacent to the northern red line boundary. This habitat should be protected using a suitable 15 metre habitat buffer, which is described below and shown in Figure 8.

- Planting of shrubs adjacent to the woodland edge with native species such as blackthorn, hawthorn and hazel.
- A 4-5 metre herbaceous sward adjacent to the shrub layer, sown with a flowering seed mix such as Emorsgate EH1 Hedgerow Mixture.
- A 2-metre grassland buffer adjacent to the herbaceous sward, cut annually to create open areas suitable for basking reptiles.
- A native species-rich hedgerow to be planted adjacent to the grassland buffer to shield the buffer and adjacent ancient woodland from potential development.

New grassland

New areas of grassland (e.g. residential gardens or public greenspace) could be created across the site and sown with a suitable seed mix such as Emorsgate EM1 General Purpose Meadow Mixture. As the improved grassland and arable land currently present on the site are poor quality habitats, creation of new areas of grassland will be beneficial to several species including bats, reptiles and invertebrates.

New tree planting

New trees could be planted as part of the soft landscaping of the Site and could contain native species of local providence such as field maple, silver birch, wild cherry, common lime (*Tilia* x *europaea*) and rowan *(Sorbus aucuparia).* These species do not grow too large yet provide foraging habitat for a range of bird species.

Figure 7 Potential habitat enhancement and protection measures

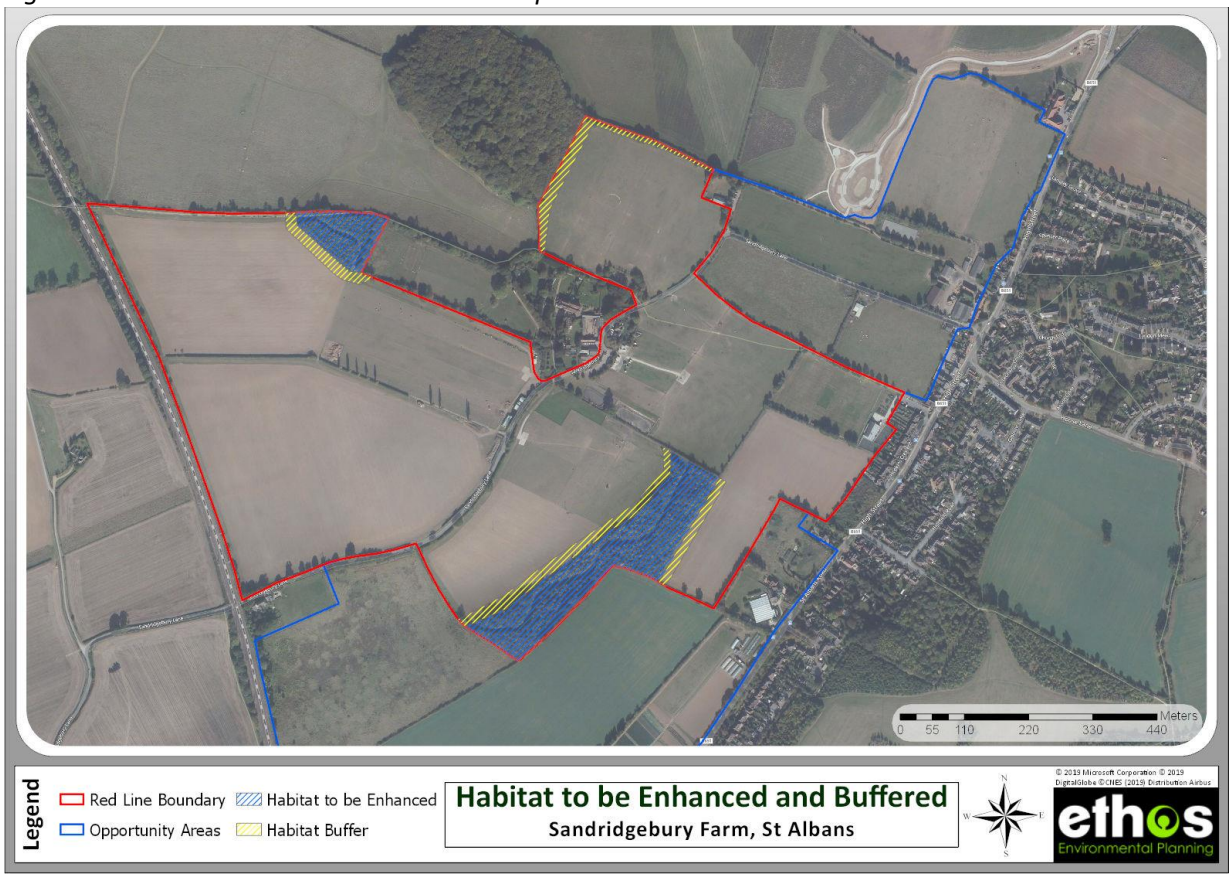
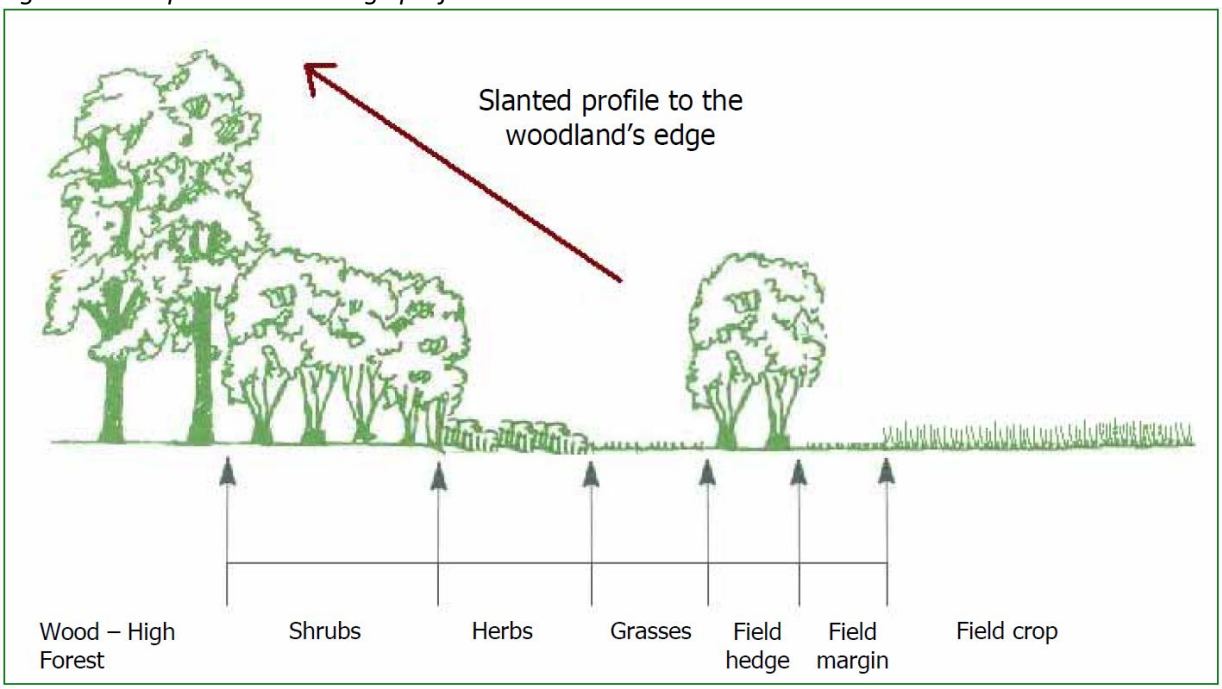


Figure 8 Example woodland edge profile



6.3 Species

6.3.1 Brown Hare

No further surveys for brown hare are recommended, however the site can be enhanced for brown hare by retaining areas of woodland and creating new areas of grassland. Suitable management can be implemented to avoid cutting retained and new grassland during the breeding season (February to September).There are also suitable areas of farmland adjacent to the site boundary which brown hare can utilise.

[redacted]

6.3.3 Bats

Mitigation

To minimise the risk of disturbance to potential foraging and commuting bats using the hedgerows and woodland (both during and post-construction), external lighting should be minimised as follows:

- Any task lighting (during construction) should not be directed at the hedgerows or woodland edges.
- Any necessary security lighting should be set on short timers and be sensitive to large moving objects only.

- Lighting should be low-levels, bollard-type, or directed downwards and shielded to minimise light spillage.
- Hoods, cowls or directional lighting should be used to avoid light directed at the sky or towards the hedgerows, mature trees or woodlands.
- Lighting should be limited to provide dark periods.

6.3.4 Birds

Mitigation

- Any tree and scrub clearance should be undertaken outside of the nesting bird season. If this is not feasible, a precautionary survey of the Site prior to works starting should be carried out by a SQE to check for active bird nests.
- If an active nest is discovered, vegetation clearance should be suspended within the area and including a buffer zone as detailed by the SQE, until all young birds have fledged and left the area.

6.3.5 Invertebrates

The following measures could be implemented to enhance the site for invertebrates:

- Bee bricks could be installed on new buildings to provide new areas of habitat for bees. Bee bricks have cavities where the bees will lay their eggs, sealing the entrance with mud or chewed-up vegetation. Offspring emerge in the spring and begin the process of nesting again, repeating the cycle. Bee bricks should be positioned in a warm, sunny, south-facing spot approximately 1m from the ground with no vegetation in front of the holes.
- Dead wood piles could be created in areas of retained habitat (e.g. woodland and hedgerows) to create new areas of habitat for invertebrates such as beetles.
- Insect hotels could be created in areas of open space to create habitat for a variety of invertebrate species. Insect hotels can be ready made (e.g. Minibeast HQ) or can be self-made with various materials including pallets, bricks, plant pots, logs, pinecones and straw. The Minibeast Hotel is a wooden structure with chambers of varying materials and pre-prepared logs and canes.

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APPENDIX 1 LEGISLATION AND POLICY DETAILS

A1.1 Legislation - Species

This section outlines the key legislation related to the habitats and species considered within this survey report.

A1.1.1 Bats

All British bats are fully protected under Section 9 Schedule 5 of the Wildlife and Countryside Act 1981 and amendments. Agreement, and are fully protected under The Conservation of Habitats and Species Regulations 2017. In addition, they are protected under the Berne Convention; they are given migratory species protection within the Bonn Convention.
Regulation 43 (1) of The Conservation of Habitats and Species Regulation 2017 makes it an offence to:

- deliberately capture, injure or kill any species of bat;
- deliberately disturb any species of bat;
- damage or destroy a breeding site or resting place of any species of bat.

It is an offence to disturb any bat roosting site, whether the bats are there or not. Under Regulations 43 (2) disturbance includes in particular any disturbance which is likely:

- To impair their ability
  - to survive, to breed or reproduce, or to rear or nurture their young; or
  - in the case of a hibernating or migratory species, to hibernate or migrate; or
- To affect significantly the local distribution or abundance of the species to which they belong.

Presence of bats does not necessarily mean that development cannot go ahead, but that with suitable, approved mitigation, exemptions can be granted from the protection afforded to bats under regulation 43 by means of a licence. Natural England (NE) is the appropriate authority for determining licence applications for works associated with developments affecting bats, including demolition of their roost sites. In cases where licences are required, certain conditions have to be met to satisfy Natural England. Before the Statutory Nature Conservation Organisation (SNCO), in this case NE, can issue a licence to permit otherwise prohibited acts three tests have to be satisfied under the requirement of Regulation 55. These are:

1. Imperative Reasons of Overriding Public Interest [Reg 55(2)(e)];
2. No Satisfactory Alternative [Reg 55(9)(a)];
3. Maintenance of Favourable Conservation Status [Reg 55(9)(b)].

In order to meet the tests, SNCO usually expects the planning position to be fully resolved as this is necessary to satisfy tests 1 and 2. Full planning permission, if applicable, will need to have been granted and any conditions relating to bats fully discharged. ahead of any licence application to the SNCO. The LPA have a legal duty under The Conservation of Habitats and Species Regulations 2017, to assess whether the application is likely to meet the Three Tests

and therefore the requirements for Natural England licensing, prior to determination of an application The Licence application process may take two months before a licence is issued. Planning Permission and granting of a bat licence are separate legal functions. Therefore receiving planning permission from the Local Authority is no guarantee that the SNCO will issue a derogation licence.

A1.1.3 Badger

The Protection of Badgers Act 1992 is based primarily on the need to protect badgers from baiting and deliberate harm or injury. It also contains restrictions that apply more widely and it is important for developers to know how this may affect their work. All the following are criminal offences:

- to wilfully kill, injure, take, possess or cruelly ill-treat a badger;
- to attempt to do so; or
- to intentionally or recklessly interfere with a sett.

Sett interference includes damaging or destroying a sett, obstructing access to a sett, and disturbing a badger whilst it is occupying a sett. It is not illegal, and therefore a licence is not required, to carry out disturbing activities in the vicinity of a sett if no badger is disturbed and the sett is not damaged or obstructed.

Development should not be permitted unless it is possible to take steps to ensure the survival of the badgers in their existing range and at the same population status, with provision of adequate alternative habitats if setts and foraging areas are destroyed. Natural England will normally only issue a licence after detailed planning permission has been granted, where applicable, so that there is no conflict with the planning process.

Before the planning application is determined, the local planning authority should request a detailed ecological survey/report and developers should be prepared to provide the following information:

- The numbers and status of badger setts and foraging areas that are affected by the proposal;
- the impact that the proposal is likely to have on badgers and what can be done by way of mitigation;
- judgment on whether the impact is necessary or acceptable; and
- a recommendation on whether a licence will be required.

A badger survey usually requires assessment of the site and a 30-50m buffer area as tunnels can extend up to 20m from sett entrances. As badgers are not a European Protected species the Three Test do not need to be applied, however Planning Permission and badger licensing are separate legal functions. Thus receiving planning permission from the Local Authority is no guarantee that development operations will not breach the Protection of Badgers Act 1992. Similarly planning permission does not guarantee that a badger licence will be granted.

A1.1.4 Birds

All wild birds are protected under the Wildlife and Countryside Act 1981 (as amended) and cannot be killed or taken, their nests and eggs taken, damaged or destroyed while their nest is in use or being built. It also prohibits or controls certain methods of killing or taking except under licence. Other activities that are prohibited include possession and sale. Activities such as killing or taking birds (including relocating) which would otherwise be illegal can be carried out under licence where there is suitable justification and the issue cannot be resolved by alternative means.

Specially protected or Schedule 1 birds receive full protection under the Wildlife and Countryside Act 1981 (as amended). Part I birds are protected at all times, Part II during the close season only. In addition to the protection from killing or taking that all birds, their nests and eggs have under the Act, Schedule 1 birds and their young must not be disturbed at the nest.

A1.1.5 Hazel dormouse

They are protected under both the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981 (as amended). Dormice and their breeding sites and resting places are fully protected. Without a licence it is an offence for anyone to deliberately disturb, capture, injure or kill them. It is also an offence to damage or destroy their breeding or resting places, to disturb or obstruct access to any place used by them for shelter. It is also an offence to possess or sell a wild dormouse.

If it is not possible to avoid harming dormice or damaging or blocking access to their habitats, a derogation licence will be required. Planning permission is required to be in place before a licence application.

Planning Permission and granting of a mitigation licence are separate legal functions. Therefore receiving planning permission from the Local Authority is no guarantee that the SNCO will issue a derogation licence.

A1.2 Policy considerations

The National Planning Policy Framework (NPPF) set out the Government's planning Policies for England, to provide the framework and planning requirements for local plans; to deliver strategic and sustainable development.

A1.3.1 National Planning Policy

NPPF 2018

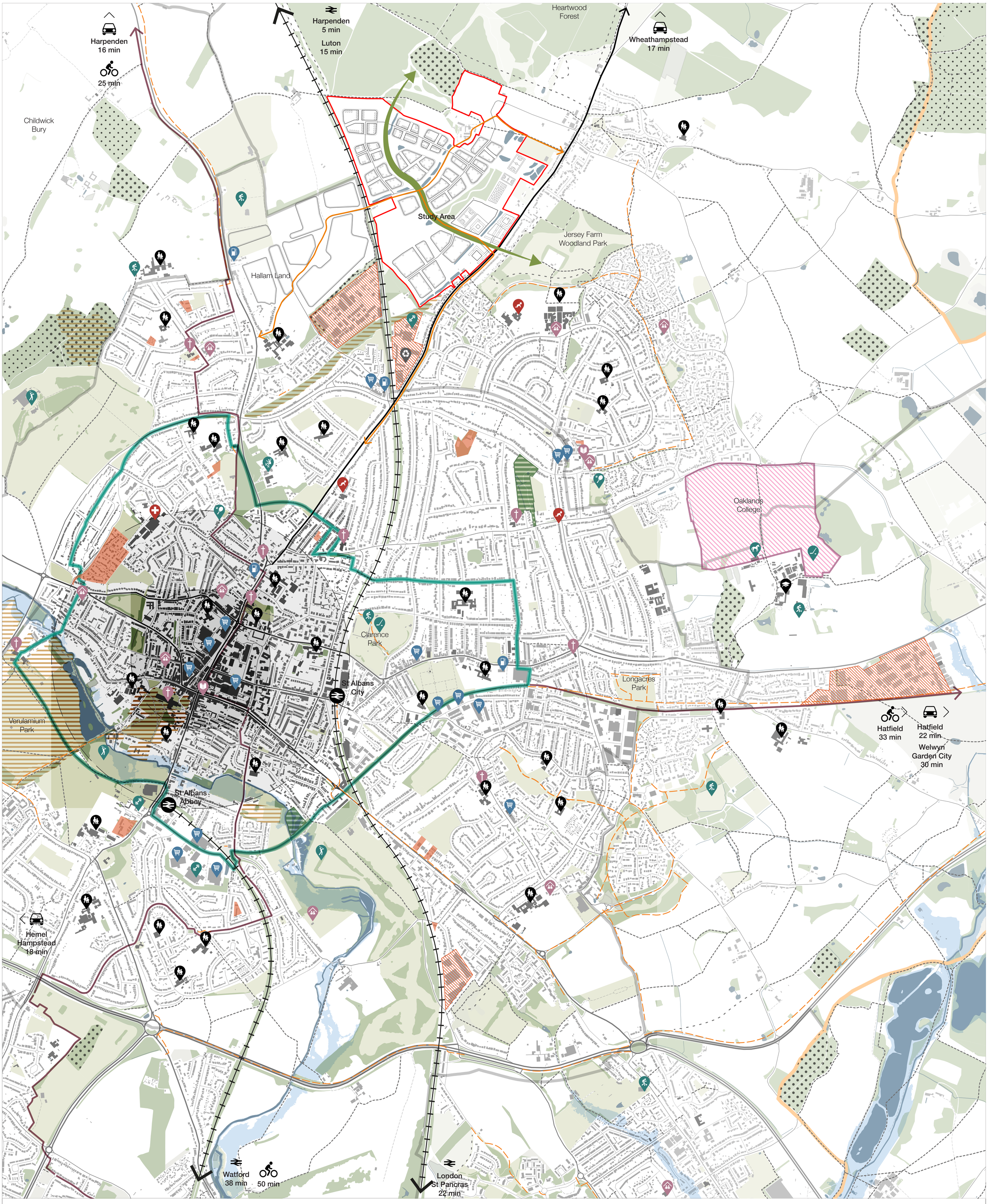
The 2012 National Planning Policy Framework has been updated and replaced with NPPF 2018. This consolidates proposals from various Government consultation documents in recent years.

The NPPF 2018 sets out principles for conserving and enhancing the local environment. Key policies are that local plans should allocate land with least environmental or amenity value and take a strategic approach to maintaining and strengthening networks of habitats and green infrastructure.

Para 173 sets out nature conservation principles that LPAs should apply to the determination of planning applications:

'*When determining planning applications, local planning authorities should apply the following principles:*

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
c) *development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland) should be refused, unless there are wholly exceptional reasons and a suitable mitigation strategy exists. Where development would involve the loss of individual aged or veteran trees that lie outside ancient woodland, it should be refused unless the need for, and benefits of, development in that location would clearly outweigh the loss; and*
d) *development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for the environment.'*



Key

- Application Boundary
- County Boundary
- Parish Boundary
- Building
- Important Building
- Urban Extent

Access & Movement

- Public Right of Way
- Bridleway
- Existing Cycle Links
- Proposed Cycle Links
- Cycle National Network
- Green Ring (Cycle Network)
- Rail Network
- Motorway
- A Road
- B Roads

Planning Designations

- District Plan - Proposed Employment
- District Plan - Developed Housing
- Local Nature Reserve
- Flood Zones

Landscape Designations

- Existing Woodland
- Ancient Woodland Semi-Natural
- Ancient Woodland Replanted
- Green Areas
- Shrub
- Grassland
- Water

Points of Interest

- Train Station
- School
- Higher Education
- Community Centre
- Church
- Library
- Hostpital
- Nursery
- Tennis Club
- Golf Club
- Equestrian Centre
- Football Centre
- Skatepark
- Hockey / Cricket
- Gym
- Supermarket
- Fuel Station

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Drawing Status

Land at Sandridgebury Lane, St Albans

Preliminary Landscape and Visual Baseline and Green Belt Appraisal

Prepared by:
The Environmental Dimension Partnership Ltd

On behalf of:
Lightwood Strategic

March 2021
Report Reference
edp6902_r001b

Contents

Appendices

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Executive Summary

S1 This Preliminary Landscape and Visual Appraisal (LVA) has been prepared by The Environmental Dimension Partnership Ltd (EDP), on behalf of Lightwood Strategic, to inform promotion of the site as part of the local plan process.

S2 The study area comprises c.124 hectares (ha) of greenfield land set within mosaic of agricultural field parcels, on the northern edge of St Albans. The area is divided up into multiple field parcels of varying shapes and sizes and is dissected by Sandridgebury Lane, which runs in a north-east south-west orientation through the site. The site contains several areas of woodland along with some existing development comprising The Coach House and Sandridgebury Farm, as well as other dwellings off St Albans Road (B651). Field boundaries are generally well vegetated with mature hedgerow and hedgerow trees.

S3 The site is not constrained by any nationally or locally designated landscapes, it does, however, entirely fall within the Green Belt.

S4 Published landscape character assessments provide a helpful contextual understanding of the defining characteristics of the wider landscape. However, clearly the site is influenced in perceptual terms to some degree by the presence of existing development to the east, south and the main line railway to the west. The site shares a number of these characteristics with the draft St Albans North allocation to the west of the railway.

S5 EDP's appraisal has found that the site has a limited envelope of visibility. The extensive screening provided by mature vegetation and maturing woodland blocks, both along field boundaries and within the wider landscape, which serve to greatly restrict intervisibility between the site and surrounding PRoW receptors, particularly to the north. Furthermore, there is already a degree of urban influence within the local context to the east and south of the site. primarily from the perceptual presence of traffic and road infrastructure as well as existing development within the built-up areas of St Albans and Sandridge. Residential receptors would be limited to proximal dwellings to the east. Road users and roadside pedestrians would be, contained to a short section of St Albans Roads where built form and vegetation allows, and Sandridgebury Lane as it passes through the site.

S6 The site has a great of shared characteristics with land to the east of the railway which has been proposed for removal from the Green Belt for residential development. A consideration of Green Belt matters at **Section 6** highlights the need for a revised and more fine grain review of the Green Belt to the north of St Albans.

S7 Accordingly, whilst any development proposals would certainly yield change and have an adverse effect on the landscape character of the site, this appraisal finds no reason why the effects to landscape character are unacceptable should development progress in the manner envisaged within **Section 7** and as illustrated on **Plan EDP 9** and **10**.

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Section 1
Introduction, Purpose and Methodology

Introduction

1.1 The Environmental Dimension Partnership Ltd (EDP) has been commissioned by Lightwood Strategic Ltd to undertake a Landscape and Visual Appraisal (LVA) of Land at Sandridgebury Lane, St Albans ('the site'). The site falls within St Albans City and District Council Local Planning Authority (LPA) area, extends to c.124 hectares (ha), and is briefly described in **Section 2** of this LVA.

1.2 EDP is an independent environmental planning consultancy with offices in Cirencester, Cheltenham and Cardiff. The practice provides advice to private and public sector clients throughout the UK in the fields of landscape, ecology, archaeology, cultural heritage, arboriculture, rights of way and masterplanning. Details of the practice can be obtained at our website (www.edp-uk.co.uk). EDP is a Registered Practice of the Landscape Institute[1] specialising in the assessment of the effects of proposed development on the landscape.

Purpose and Structure of this LVA

1.3 The purpose of this LVA is to identify the baseline conditions of the site and surrounding area and to determine those landscape and visual characteristics that might inform the design of the development proposals, including recommendations for mitigation.

1.4 In undertaking the assessment described in this LVA, EDP has:

- Undertaken a thorough data trawl of relevant designations and background documents, described in **Section 3**;
- Assessed the existing (baseline) condition and character of the site and its setting, described in **Section 4**;
- Assessed the existing visual (baseline) context, especially any key views to and from the site (**Section 5**);
- Reviewed Green Belt matters pertaining to the site and adjacent context to the north of St Albans (**Section 6**); and
- Described the landscape aspects of development that may influence any landscape or visual effects, and how these should inform the emerging masterplan proposals (**Section 7**).

[1] LI Practice Number 1010

Methodology Adopted for the Assessment

1.5 This LVA has, therefore, been undertaken in accordance with the principles embodied in 'Guidelines for Landscape and Visual Impact Assessment - Third Edition (LI/IEMA, 2013)' (GLVIA3) and other best practice guidance insofar as it is relevant to non-EIA schemes.

1.6 **Familiarisation**: EDP's study has included reviews of aerial photographs, web searches, LPA publications and landscape character assessments. EDP has also obtained, where possible, information about relevant landscape and other designations such as Areas of Outstanding Natural Beauty (AONBs), conservation areas and gardens and parks listed on Historic England's 'Register of Historic Parks and Gardens of Special Historic Interest in England' (RPG).

1.7 **Field Assessment**: EDP has undertaken a comprehensive field assessment of local site circumstances, including a photographic survey of the character and fabric of the site and its surroundings, using photography from a number of representative viewpoints. The field assessment was undertaken by a Chartered Landscape Architect in February 2021, in clear weather conditions.

1.8 **Design Inputs:** EDP's field assessment should be used to inform any emerging development proposals, and how they should be refined to avoid, minimise or compensate for landscape effects. Such measures are summarised in **Section 7**.

Study Area

1.9 To establish the baseline and potential limit of material effects, the study area has been considered at two geographical scales:

- First, a broad 'study area' was adopted, based mainly on desk-based study, this broad study area allowed the geographical scope of the assessment to be defined based on the extent of views to/from the site, extent of landscape effects and the site's environmental planning context; and

- Second, following initial analysis and subsequent fieldwork, the broad study area was refined down to the land that is most likely to experience landscape effects. The extent of this detailed study area is 2km from the site boundary, although occasional reference may be made to features beyond this area where appropriate. This detailed study area is illustrated on **Plan EDP 1**.

Section 2
The Site

2.1 **Plan EDP 1** illustrates the location of the site's boundaries and the study area for the LVA. The site is centrally located within the parish of Sandridge, which lies adjacent to the northern edge of St Albans, Hertfordshire, and is within St Albans City and District LPA.

2.2 The site area comprises c.124ha of greenfield land set within mosaic of agricultural field parcels, on the northern edge of St Albans. The site is divided up into multiple field parcels of varying shapes and sizes and is dissected by Sandridgebury Lane, which runs in a north-east south-west orientation through the site. The site contains several areas of woodland along with some existing development comprising The Coach House and Sandridgebury Farm, as well as other dwellings off St Albans Road (B651). Field boundaries are generally well vegetated with mature hedgerow and hedgerow trees.

2.3 Geology is an important factor in determining landscape as it influences landform, soil type, vegetation patterns, land use and settlement patterns. The solid and the superficial geology is illustrated on **Plan EDP 2** (data from the British Geological Survey).

2.4 Soils across the study area (the distribution of which are shown on **Plan EDP 3**) are a product of the underlying geology in combination with physical weathering. Three 'soilscapes' extend across the study area. The majority of the study area is formed of slightly acidic loamy and clayey soils with impeded drainage. Areas of more freely draining slightly acid but base-rich soils are found in transitional zones between the valleys, such as along the eastern site boundary.

2.5 The site is physically contained by a railway line adjacent to its western boundary, existing development within St Albans to the south and St Albans Road along its eastern boundary. Its northern boundary is predominantly free of development and is delineated by vegetation associated with existing field boundaries and the Heartwood Forest.

2.6 The site has several public rights of way (PRoW) within the northern site areas, which broadly run east to west. There are also a number of tracks and permissive routes throughout the site, which connect to Sandridgebury Lane, Sandridgebury Farm and the Heartwood Forest.

2.7 The topographical context of the site and surrounds is illustrated on **Plan EDP 4**, the site has a generally south-easterly aspect, with the north-western corner being at grade with the track and Sandridge Bridleway 009, which passes over the railway, at approximately 130m above Ordnance Datum (aOD). There is a fall of approximately 46m to the eastern boundary, towards St Albans Road and existing development within Sandridge, which lies at approximately 84m aOD.

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Section 3
Findings of EDP Data Trawl

3.1 The findings of EDP's data trawl of relevant environmental and planning designations are illustrated on **Plan EDP 1**. In summary:

- The site falls within the London Area Green Belt; and
- The site contains a Tree Preservation Order (TPO) (reference TPO1252 (W1), located within the southern site area.

Background Published Evidence Base Documents

3.2 The following documents are relevant to this LVA:

- St Albans City and District Development Plan comprising:
  - District Local Plan Review 1994 – Saved and Deleted Policies;
  - Harpenden Neighbourhood Plan;
  - Sandridge Neighbourhood Plan (Emerging);
  - Waste Core Strategy & Development Management Policies DPD 2012;
  - Waste Site Allocations DPD 2014; and
  - The Hertfordshire Minerals Local Plan 2007.
- Hertfordshire Landscape Character Area Statements; and
- St Albans District Green Infrastructure Plan 2011.

Findings of EDP Data Trawl

Landscape-related Designations and Other Considerations

3.3 Landscape-related designations and policy considerations within 2km of the site are shown on **Plan EDP 6**.

- National landscape designations: The site falls within the London Area Green Belt; and

- Local landscape designations: The site does not lie within a locally designated landscape.

Heritage Matters

3.4 Heritage assets can influence the visual character of the landscape and enrich its historic value. This LVA addresses heritage assets only insofar as they are components of the wider contemporary landscape – not in terms of their significance and value as heritage assets.

3.5 Within the wider study area, the following heritage assets are components of the contemporary landscape:

- Beech Bottom Dyke Scheduled Monument is located at the site's southern boundary. Batch Wood Scheduled Monument is located approximately 1.7km to the west of the site;

- Sandridge Conservation Area lies adjacent to the eastern site boundary, and comprises numerous listed buildings; and

- Two listed buildings; The Coach House and Sandridgebury Farm.

3.6 With the above points in mind, these heritage assets have been subject to further consideration within EDP report edp6902_r002.

Ecology Matters

3.7 A separate Ecology Assessment, prepared by Aspect Ecology, considers the ecological assets on the site and within the study area. The following matters are relevant to the scope of this LVA:

- The site contains four areas of woodland classified within the Priority Habitat Inventory as 'Deciduous Woodland'.

Arboricultural Matters

3.8 A detailed Arboricultural Assessment is yet to be prepared for the site. However, the following matters are relevant to the scope of this LVA:

- The site contains a Tree Preservation Order (reference TPO1252 (W1), located within the southern site area.

Public Access and Rights of Way

3.9 A review of the definitive map reveals the following PRoW and open access land within the Study Area. PRoW are shown on **Plan EDP 7**.

3.10 The closest areas of open access land include Nomansland Common situated approximately 1.3km to the north and also Harpenden Common, which lies approximately 1.4km to the north-west of the site. There are also sporadic pockets of common land situated within the St Albans development area, to the south of the site.

3.11 The site has several PRoW within the northern site areas, which broadly run east to west. There are also a number of tracks and permissive routes throughout the site, which connect to Sandridgebury Lane, Sandridgebury Farm and the woodland blocks.

3.12 Sandridge Bridleway 009 comprises a track, which passes over the existing railway track to the west and runs along the northern site boundary. This PRoW forms part of the promoted route and long-distance footpath, the Hertfordshire Way, which comprises a 195-mile circular route of interlinked PRoW within the county of Hertfordshire.

3.13 Sandridge Bridleway 009 ceases at Sandridgebury Farm and connects to PRoW Footpath Sandridge 033. PRoW footpath Sandridge 011 adjoins the aforementioned footpath and connects Sandridgebury Lane to St Albans Road and the settlement of Sandridge to the east. Bridleway Sandridge 008 also runs along the northern site boundary and connects the settlement of Sandridge to Langley Wood and the wider landscape to the north of the site.

3.14 The Heartwood Forest owned by the Woodland Trust is located to the immediate north of the site and contains a number of blocks of Ancient Woodland (Pismire Spring, Langley Wood, Well Wood, Pudler's Wood and Round Wood), wildflower meadows, an orchard, arboretum as well as extensive areas of newly planted woodland. Public access is actively encouraged, with parking provision and a series of well signed recreational routes. As illustrated below in **Images EDP 3.1** and **3.2**, whilst much of the woodland planting is still maturing and the full effectiveness of screening is yet to be achieved, planting is already forming a unified canopy, which wraps around the northern site boundary.

Image EDP 3.1: Location of the Heartwood Forest December 2000 (Source: Google Earth)

Image EDP 3.2: Heartwood Forest April 2020 (Source: Google Earth)

3.15 To the east of the site, south of Sandridge is Jersey Farm Woodland Park, owned by St. Albans City and District Council and managed with support from Sandridge Parish Council as an area of public open space comprising blocks of woodland and meadow. The site is crossed by a network of permissive routes and has good permeability with the surrounding settlement edge and public highway network.

Adopted Local Plan (Published)

District Local Plan Review (1994)

3.16 As stated on the LPA website:

"the current adopted Local Plan is The District Local Plan Review 1994. This is being replaced by a new Local Plan. Local Plans "expired" after 27th September 2007 unless "saved", in whole or in part. In 2007, a Direction was made saving specified policies of the District Local Plan Review 1994, ie they are still part of the development plan for St Albans. The policies listed in the List of Saved Policies are therefore the remaining operational policies within the District Local Plan Review 1994. Any policies not on the list have expired and are no longer part of the development plan."

3.17 The adopted development plan consists of the *District Local Plan Review (1994*), which includes over-arching general development policies, to which the development proposals would be tested. Policies that are specific to the site in landscape and visual terms are discussed below.

3.18 Policy 74: Landscaping and Tree Preservation relating to the retention of existing landscape features and provision of new landscaping.

3.19 Policy 97: Existing footpaths, bridleways and cycleways relates to the aim for retention of existing PRoW and potential diversions being accepted only with favourable replacements.

3.20 Policy 105: Landscape Development and Improvement seeks to promote and secure landscape creation, improvement and enhancements throughout the Green Belt countryside.

Sandridge Neighbourhood Plan (referendum 06 May 2021)

3.21 Following the final examiners report in December 2020, the plan is due to go to referendum in May 2021. Policies that are specific to the site in landscape and visual terms are discussed below.

3.22 Policy E1 Natural Environment, Biodiversity and Green Infrastructure: Positive improvements to Green Infrastructure and a net gain in biodiversity should be achieved as the result of all major development proposals.

3.23 Policy E2 Landscape, Views and Gaps: Relates to the need to maintain the views, landscape features and gaps between settlements, and provides further guidance for development proposals.

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Section 4
Existing (Baseline) Conditions: Landscape Character

4.1 This section provides an assessment of the 'baseline' (existing) conditions in respect of the character of the site and its landscape context. It summarises any relevant published landscape assessments that contribute to a better understanding of the landscape context. Such assessments provide a helpful understanding of the landscape context, but rarely deliver sufficiently site-specific or up-to-date information to draw robust conclusions about the significance of any change proposed by the development. Accordingly, EDP has undertaken its own assessment of the site itself, which is included in this section.

National Character Assessment

4.2 At the national level, the character of England has been described and classified in the National Character Area (NCA) profiles published by Natural England[2]. The site and its surroundings fall within NCA 110 'Chilterns'.

4.3 Given the size of the site and scale of likely effects, while such descriptions at the national level provide a broad understanding that informs this study, the description of landscape character undertaken at the sub-regional level is considered more relevant in establishing the landscape resource baseline. Of much greater use are the more localised, district and county-specific assessments described below.

Local Landscape Character Assessments

Hertfordshire Landscape Character Area Statements

4.4 The Hertfordshire Landscape Character Area Statements collates all the district-scale Landscape Character Area Statements that apply to the St Albans District. The statements were produced as part of the "Hertfordshire Landscape Character Assessment" undertaken between 2000 & 2005. Extracts of the relevant section of this landscape character assessment and associated maps are contained within **Appendix EDP 4**.

4.5 As illustrated on **Plan EDP 5** the site falls within Landscape Character Area (LCA) 102 Ayres End Valleys. This LCA *"is bounded by the A1081 to the west, Harpenden and Wheathampstead to the north and Sandridge and St. Albans to the east and south. The area is split into two unequal parts by the linear settlement of Sandridge along the B651"* – named parts 'a' and 'b', with the site falling into the larger latter area.

[2] https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles

4.6 The assessment summarises this LCA as having a "*network of dry interconnecting valleys with a sense of rural seclusion despite the close proximity of settlements on the higher ground to the rear of the smaller plateau areas on the fringes of this area*.". The assessment notes that the "*visual containment is aided by the prominent small and medium sized woods located on the upper reaches of the valley sides*".

4.7 The key characteristics of this LCA are listed below, with those of greater relevance to the site and its immediate context emboldened for emphasis:

- Open dry valleys overlooked by smaller areas of plateau on the fringes;
- Quiet area with few visual detractors except the A1081 and mainline railway to the west;
- **Small woods on the upper slopes emphasize the valleys**;
- **Area served by narrow**, **winding roads lined by dense mixed hedgerows**;
- **Mixed arable**, **pasture and recreational land uses**;
- **Number of equestrian establishments associated with small country houses**, **including The Grove and Sandridgebury**;
- **Locally prominent built edges to adjacent settlements**; and
- Isolated properties or small clusters of dwellings, generally with strong vernacular architecture;

4.8 It is also noteworthy that the published LCA details distinctive features for the area, none of which feature within the site.

4.9 The published LCA also states that "*the area is generally both visually contained and coherent. Despite the close proximity of a number of towns the distant and enclosing views are largely formed and framed by vegetation or landform".* It also notes that the "*most significant noise source is from the main line railway",* which is situated adjacent to the site's western boundary. In regard to rarity and distinctiveness, the published LCA notes that this landscape type is "*frequent within the county*", suggesting that it is none 'rare'.

4.10 In regard to visual impact, the assessment acknowledges both the well treed character of the landscape and prominence of raw built form, stating "*there are some relatively raw built edges to the open countryside, e.g. along Cross Lane, Harpenden, to the southern boundary of Wheathampstead and from parts of Sandridge. However, the wider countryside is protected from the full impact of the more extensive residential areas, which are either set back from the ridgelines or screened by belts of trees"*.

4.11 Overall, the assessment concludes the area to lack rarity and to be visually contained, with an overall objective to 'improve and conserve'.

4.12 Hertfordshire County Council's LCA was written prior to the establishment of Heartwood Forest and is therefore not up to date. The Woodland Trust acquired its 347 hectares (850 acres) in September 2008, almost all of which was being farmed commercially with arable crops. Three-quarters of the site is now covered with 600,000 native trees. There are also areas of open space in the grasslands and wildflower meadows, a community orchard and an arboretum.

EDP Site Assessment

4.13 While the above-published assessments provide a helpful contextual appreciation of the wider landscape, none provide a sufficiently site-specific assessment to allow a reliable assessment to be made of the effects of the proposed development on the landscape. In particular, published assessments tend to miss more localised influences on the landscape such as the effect of traffic or existing development on tranquillity and visual character, especially in close proximity to settlements. This requires an appropriately detailed assessment of the site itself and its immediate surroundings, building upon that already provided within **Section 2**, which EDP has undertaken and is described below. The following should be read in conjunction with **Plan EDP 6**.

4.14 A site visit took place in February 2021 in clear weather conditions. The visit was complemented by a review of aerial photography, mapping and field assessments from publicly accessible locations (e.g. from local roads and PRoW).

4.15 As acknowledged within the published LCA, the site is well enclosed and contains a high number of mature and maturing landscape features. These primarily consist of well-established hedgerows with mature hedgerow trees along Sandridgebury Lane, along the rear of development along St Albans Road and at the edge of existing agricultural field boundaries within the site.

4.16 The existing woodland blocks within the site provide the main bulk of the existing Green Infrastructure, with the intra-site hedgerows and trees providing connectivity between the vegetated site boundaries. In turn, as identified within the published LCA, these mature and maturing landscape features serve to enclose the site and restrict views of the site to the local area. A combination of local topography combined with the presence of maturing landscape features (as illustrated in **Images EDP 4.1** and **4.2**, structural landscaping readily establishes in this context) both within the site and its immediate context provide an enclosed site character. This is predominantly experienced through a lack of longer distance outward views and the perceptual presence of maturing landscape features.

Image EDP 4.1: Location of the central plantation December 2000 (Source: Google Earth)

Image EDP 4.2: Established plantation April 2020 (Source: Google Earth)

4.17 Both the audible and visual presence of the railway line adjacent to the western site boundary and St Albans Road to the east of the site are apparent from within the site, with a combination of visible road and railway infrastructure, noise and views of passing traffic serving to urbanise the perceptual qualities of the site's landscape character in close proximity to these detractors. This is consistent with the published description of the LCA, which highlights these urbanising qualities.

The Value of the Landscape Resource

4.18 GLVIA3 sets out the requirements for considering sensitivity of landscape resources at paragraphs 5.39 to 5.47, and states here that "*Landscape receptors need to be assessed firstly in terms of their sensitivity, combining judgements of their susceptibility to the type of change or development proposed and the value attached to the landscape"*. The value of the individual landscape characteristics of the site are detailed below. For ease of reference the susceptibility to change is also included, which is based upon the assessment of the site and the proposals.

4.19 With reference to the criteria which indicate value, as defined within Box 5.1 of GLVIA3, examination of the site's characteristics has found that:

- Landscape quality (condition and intactness): The quality of the site is considered to be medium due to the high degree of connectivity within the landscape fabric and its intact and well-established woodland areas. However, much of planting within and adjacent to the site is relatively recent (as illustrated on **Images EDP 4.1** and **4.2**). The tranquillity and landscape character is influenced by the railway, nearby road network and visible existing built form;

- Scenic quality including views out: The scenic quality is considered to be medium, primarily to the fact that any views from the site, where available given the site's contained nature, are of passing traffic, road infrastructure or built form within the site's immediate context. There is limited visual appreciation of the wider landscape from within the site;

- Rarity of features defined in the landscape: The site contains some agricultural development and minor roadways. The topography and existing woodland are the most notable site qualities, however, as acknowledged by the published LCA , the site and wider LCA are frequent within the county, which suggests a lack of rarity. Therefore, the rarity of landscape features is considered to be low;

- Representativeness of particular landscape features: the site is fairly representative of the published LCA – mainly noting its wooded character, arable land use and visual prominence of some existing built form within Sandridge. With this in mind the site is considered to present a medium degree of representativeness;

- Perceptual Aspects including consideration of site setting: The perceptual aspects of the site are degraded by the adjacent railway, wider road network and existing built form within St Albans and Sandridge. These serve to degrade the level of tranquillity within the site; and

- Recreation: the existence of numerous PRoW within the site suggests some value in regard to recreation and connection with the wider landscape. The promoted route and long-distance footpath, the Hertfordshire Way, runs along the site boundary. This indicates a medium degree of recreational value for the surrounding communities. There are a number of recreational destinations in close proximity to the site

(Heartwood Forest and Jersey Farm Woodland Park). The southern portion of the site has a notable absence of PRoW.

4.20 Having assessed the site in accordance with GLVIA3 Box 5.1, it is concluded that the site has a value of medium, consistent with the published LCA. Furthermore, it should be noted that, the Local Plan (1994) includes an extensive landscape conservation area in St Albans (Policy 104) as illustrated on **Plan EDP 7** within which the site is not included. There is no additional policy weight to indicate an elevated landscape value.

Interim Conclusions: Landscape Character

Overall Sensitivity of the Site Character

4.21 The susceptibility of the landscape resource is defined as the ability of the receptor (whether the overall character, individual fabric elements or perceptual aspects) to accommodate the proposed development without undue consequences for the maintenance of the baseline situation. On the basis of the above consideration of susceptibility factors, the overall susceptibility of the landscape character is deemed to be medium.

4.22 The existing woodland blocks within the site provide the main bulk of the existing Green Infrastructure, with the intra-site hedgerows and trees providing connectivity between the vegetated site boundaries. Both the published LCA's and EDP's site assessment identify mature and maturing landscape features, which serve to enclose the site and restrict views of the site to the local area. Both site assessments also note the local urbanising features within the landscape such as the railway and existing 'raw edge' of built form within Sandridge. Although the site contains Green Belt land, this is more of a spatial planning tool rather than indicating any intrinsic landscape value or quality of the site. Combining the medium susceptibility of the site and medium value identified previously, the site is considered to have a **medium** sensitivity to proposed development.

Overall Sensitivity of the 102(b) Ayres End Valleys LCA

4.23 The published Hertfordshire Landscape Character Assessment *(2005)* identifies this LCA as having an objective to improve and conserve. As stated previously, the LCA does contain some higher quality landscape features, notably the woodland areas and well vegetated field boundaries. However, given the visual detractors noted within the assessment, the overall sensitivity of the LCA is reduced. Although the area contains Green Belt land, this is more of a spatial planning tool rather than indicating any intrinsic landscape value or quality of the LCA. For this reason, the overall sensitivity of the LCA is judged to be **medium**.

Section 5
Existing (Baseline) Conditions: Visual Amenity

Introduction

5.1 Visual amenity (as opposed to 'visual character' described in the previous section) is not about the visual appearance of the site, but has to do with the number, distribution and character of views towards, from or within the site. An analysis of visual amenity allows conclusions to be reached about who may experience visual change, from where and to what degree those views will be affected by the proposed development.

5.2 This section describes the existing views; consideration for the potential changes to views wrought by any proposed development are considered in **Section 7**. An analysis of existing views and the 'receptors' likely to experience visual change has conducted in three steps described in turn below:

Step One: Defining Zones of Theoretical and Primary Visibility

5.3 The starting point for an assessment of visual amenity is a computer-generated 'zone of theoretical visibility' (ZTV). The ZTV is derived using digital landform height data only and therefore it does not account for the screening effects of intervening buildings, structures or vegetation, but it does give a prediction of the areas that, theoretically, may be able to experience visual change; it thus provides the basis for more detailed field assessment.

5.4 The ZTV is then refined by walking and driving local roads, rights of way and other publicly accessible viewpoints to arrive at a more accurate, 'field-tested' zone of primary visibility (ZPV). The ZPV is where views of the proposed development would normally be close-ranging and open, whether in the public or private domain, on foot, cycling or in a vehicle. In this instance, the field assessment was undertaken by a Chartered Landscape Architect in February 2021.

5.5 Beyond the ZPV lies a zone of visibility that is less open, being either partly-screened or filtered. Views from within this zone would include the proposal – it may not be immediately noticeable, but once recognised would be a perceptible addition to the view.

5.6 **Plan EDP 8** illustrates the findings of the visual appraisal and extent of the ZPV. The ZTV is not illustrated.

Step Two: Defining Receptor Groups

5.7 Within the ZPV and wider area, the people ('receptors') likely to experience visual change can be considered as falling into a number of discernible groups.

Rights of Way Users

5.8 As discussed in **Section 3**, four PRoW pass within the boundary of the site (Sandridge 008, 009, 011 and 33). Furthermore, there are a number of PRoW identified within the study area as shown on **Plan EDP 6**. These generally provide pedestrian links between existing road networks and from the existing settlement edges to destinations such and Heartwood Forest and Jersey Farm Woodland Park. Due to maturing vegetation (including Heartwood Forest to the north), topography and built form, most intervisibility between the site and surrounding PRoW is limited to within 300m of the site boundary, with more elevated views from higher ground to the east (**Photoviewpoint EDP 15**).

5.9 Views from PRoW to the north (illustrated by **Photoviewpoints EDP 2**, **3**, **4** and **5**) are foreshortened by the Heartwood Forest, and broadly limited to the immediate site boundary. Although comprising a significant portion of younger planting, much of Heartwood Forest has already achieved a unified wooded canopy, which contains the site to the north.

5.10 Views from the PRoW network to the east are restricted by development, where available, are often glimpsed and short duration, as illustrated by **Photoviewpoints EDP 1, 9** and **11**. More extensive views are afforded from elevation positions within Jersey Farm Woodland Park (where trees and woodland allow) illustrated by **Photoviewpoint EDP 10**. **Photoviewpoint EDP 12**, illustrates the maximum visible site extent from the east (at 1km from the site boundary), from this location the existing settlement of St Albans is a visual and tangible element of the view further to the south-west.

5.11 Views from the south are limited to the rear of properties, which forms the site's boundary where there is an absence of PRoW. From the south-west and west views are limited to a maximum distance of approximately 800m as illustrated by **Photoviewpoints EDP 5, 6** and **7**. Such views are over the railway line, with the existing settlement edge exerting an influence over both the visual context and tranquillity. Furthermore, many of these views would be materially changed should the proposed allocation to the north of Long Spring be secured. Users of these PRoW are receptors situated within a peri-urban environment.

5.12 It is considered that, due to the focus on the surrounding landscape and interest in the local area, users of local PRoW throughout the study area – although with some de-sensitisation where views are possible of existing built form, large man-made features, or busy/major transport corridors – are considered to be high sensitivity receptors.

Road Users

5.13 Although there are a number of roads within the study area, only one is afforded open view of the site (Sandridgebury Lane, which crosses the site). Due to a combination of existing built form, surrounding woodland and localised changes in topography, views from surrounding roads are ultimately contained to the immediate setting in this context. As St Albans road is situated directly to the eastern site boundary, short distance, filtered views from this road, westwards, are available (**Photoviewpoint EDP 2**). Despite this available views of the site from this road route are predominantly limitied in clarity to the points at which the site boundary directly abuts the highway, with surrounding wooded

character and existing intervening built form along St Albans Road limiting the extend of further views into the site's centre.

5.14 Moving further away from the site, views become severely limited and almost non-existent due to both the presence of existing built form and intervening maturing vegetation, both of which serve to screen and heavily filter views from road corridors.

5.15 Within Sandridge, views from road corridors are generally contained to the immediate urban setting. Glimped views will be available where built form allows, as illustrated by **Photoviewpoints EDP 1** and **9**. Road users on these aforementioned routes, including users of public transport and roadside pedestrians, have very little focus on the surrounding landscape and are considered to be low sensitivity receptors.

Residential Dwellings/Groups

5.16 Views from private residential properties, although likely to be of high to very high sensitivity to changes in the view, are not protected by national planning guidance or local planning policy. Accordingly, changes to the character, 'quality' and nature of private views are not a material planning consideration in the determination of a planning application. However, they remain relevant to this review of the predicted extent and nature of visual change, so are reviewed briefly below.

5.17 Due to the distribution and orientation of residential properties within the site's context and intervening vegetation within the landscape surrounding the site, the number of private residential properties with potential views of the site are limited. Views from residential properties are generally limited to those few properties immediately adjacent to the site boundary or within close proximity.

5.18 There are two residential dwellings situated within the site; Sandridgebury House/Court in the north of the site and Bridge Cottage. As demonstrated on **Plan EDP 2**, three groups of residential dwellings were identified during the site visit to have the potential to experience intervisibility with the site as a result of their close proximity. These are summarised below:

1. Properties along St Albans Road: This group of dwellings comprises a number of residential dwellings located immediatley east of the site, extending from St Albans to Sandridge;

2. Properties within Sandridge: This group of dwellings comprises a number residential dwellings to the east of the site; and

3. Properties to the north-west of the railway, Greens Cottage, The Whitehouse and Cheapside Farm: This group of dwellings comprises a number of residential dwellings to the west of the site.

5.19 It is noteworthy that the residential receptors detailed above only have the 'potential' for intervisibility and in reality the heavily wooded context of the both the local landscape and

site itself could mean that the actual number of dwellings that experience views of the site is greatly reduced from that detailed above.

5.20 Residents within the wider study area often become less susceptible to the proposed development due to their views being contained to the 'settlement setting' and immediate surrounding fields and vegetation. The sensitivity of residential receptors is dependent, to some extent, on the room(s), and the activities of people in those rooms, from which the site is visible. Residents with visibility from rooms normally occupied in waking hours would generally have a very high sensitivity, with a lower sensitivity from bedrooms and rooms from which there may be no expected view, for example bathrooms. In some instances, the purpose of rooms with potential views towards the site cannot be ascertained from public vantage points, thus in those circumstances a cautionary approach is adopted where the receptor is accorded a **very high** sensitivity.

Step Three: Defining Representative Viewpoints

5.21 Within the ZPV, there are clearly many individual points at which views towards the site are gained. EDP has selected a number of viewpoints that are considered representative of the nature of the views from each of the receptor groups. The selection of the representative viewpoints is based on the principle that the assessment needs to test the 'worst case' scenario, and in selecting these viewpoints, EDP has sought to include:

- A range of viewpoints from all points of the compass, north, south, east and west; and

- A range of viewpoints from varying distances from all the above receptor groups. Considering the contained nature of the site, these are limited to within a 1km radius of the site.

5.22 The representation of views is supported by twelve photoviewpoints (PVPs). Their location is illustrated on **Plan EDP 2**. Photographs from the selected viewpoints are contained in **Appendix EDP 2**. The purpose of these viewpoints is to aid assessment of a visual receptor(s). These viewpoints are not assessed separately.

Table EDP 5.1: Summary of Representative Photoviewpoints

PVP. No.	Location	Grid Reference	Distance and Direction of View	Reason(s) for Selection and Sensitivity of Receptor
1	View from terminus of Footpath 035 within Sandridge Conservation Area adjacent to the Church of St Leonard	517092.56, 210556.54	63m; West	PRoW users (high)
2	View from Footpath 032 to the North of Sandridge	517196.72, 210963.68	100m; South-west	PRoW users (high) Road users (low)

PVP. No.	Location	Grid Reference	Distance and Direction of View	Reason(s) for Selection and Sensitivity of Receptor
3	View from high point within Heartwood Forest	516468.52, 211208.13	350m; South-west	Recreational users (high)
4	View from Bridleway 009 at the junction of the Heartwood Forest and Railway	515475.93, 210734.69	0m; East	PRoW users (high)
5	View from Bridleway 009 to the west of the railway line.	515402.89, 210738.55	70m; East	PRoW users (high)
6	View from Footpath 096 at Long Spring to the immediate north of the Settlement edge of St Albans	515639.36, 209643.99	200m; North-east	PRoW users (high)
7	View from Footpath 096 at Long Spring at the Junction with Valley Road	515382.37, 209394.4	765m; North-east	PRoW users (high) Road users (low)
8	View from Sandridge Recreational Ground, Footpath 011 (Hertfordshire Way Promoted Route)	516857.03, 210421.01	0m; West	PRoW users (high)
9	View from Footpath 027 within Jersey Farm Woodland Park	517301.05, 210475.51	300m; West	PRoW users (high) Visitors to Jersey Farm Woodland Park
10	View from Bridleway 053 at the interface of Jersey Farm Woodland Park and the existing settlement along St Albans Road.	517301.05, 210475.51	300m; West	PRoW users (high) Visitors to Jersey Farm Woodland Park
11	View from Footpath 022 adjacent to St Leonards Playground	516908.16, 210102.13	185m; North-west	PRoW users (high) Road users (low)
12	View from Footpath 031 to the west of the wireless station at Woodcock Hill	518125.98, 210300.98	1Km; west	PRoW users (high) Road users (low)

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Section 6
Green Belt Matters

6.1 The site does sit within the London Green Belt (considered a spatial strategy rather than one designated for its landscape and visual value) however; and as such the proposal for the site's removal from the designation needs to be considered against purposes of Green Belt set out within the NPPF to ensure that they can continue to be achieved with the removal of the site from the overall designation.

6.2 A Green Belt Review Purposes Assessment (November 2013) was prepared jointly for the St Albans Council with Dacorum and Welwyn Hatfield Councils by SKM. Stage 1 of the review identified large parcels of land across the three authorities. Those areas contributing least to the Green Belt were determined and a number of strategic sub areas in St Albans were identified for further investigation. These were taken forward to Stage 2 where SKM undertook a review and detailed assessment of those strategic sub areas in the Green Belt Review Sites and Boundaries Study (December 2013 and February 2014, including a one page errata sheet for the 2014 version, dated 12 April 2014).

6.3 **Image EDP 6.1** indicates the approximate site location within parcel 37. It is clear that the site is considerably smaller than parcel 38, which warrants further consideration in terms of sub-division. Elsewhere, sub-division has occurred where areas exhibit different characteristics, and/or perform a different role or function to another part of the same parcel. This is essential when considering the removal of land from the Green Belt.

6.4 Parcel 37 is very large and captures the land dividing Harpenden from Wheathampstead as well as the north fringe of St Albans. The SKM report (2013) was undertaken only five years after the Woodland Trust acquired the land that now forms the maturing Heartwood Forest. At the time of the SKM report little structural landscape change had actually taken place. As of 2021 that is no longer the case and a considerable change is evident. Even with this change and the effect on the way one should identify strategic Green Belt cells for assessment, parcel 37 was unjustifiably inconsistent with the northern boundary of parcel 38 (Ayres End Lane). This lane runs into Ferrers Lane to the south of Nomansland Common. With the more recent establishment Heartwood Forest the former area identified as Cell 37 requires yet further reconsideration.

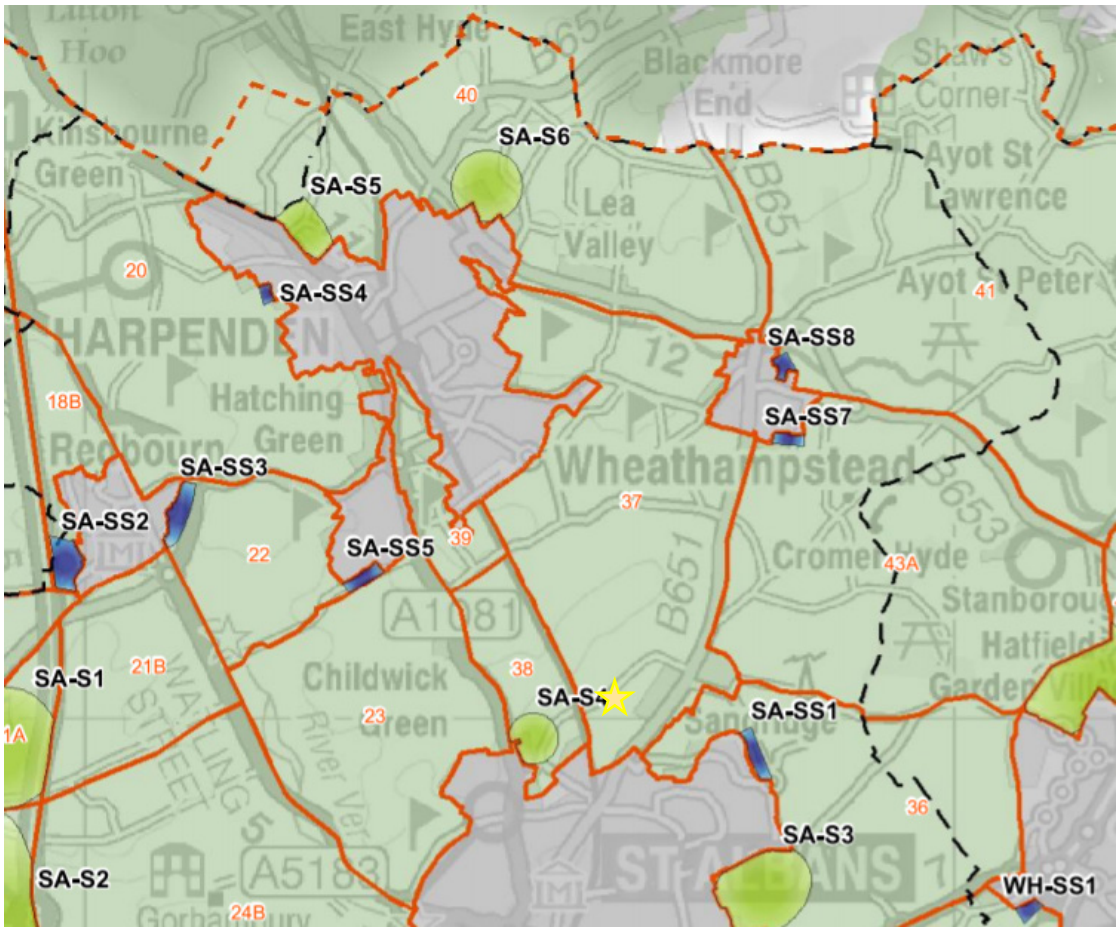

Image EDP 6.1: Illustraing the approximate site location within parcel 37 (Yellow Star)

6.5 The location of SA-S4 within cell 38, identified as a green circle in Green Belt Review Purposes Assessment (November 2013) was identified as a sub-area for further assessment. This took place the Green Belt Review Sites and Boundaries Study (December 2013 and February 2014. The green circle was identified on the basis that (bold is EDP emphasis):

"The sub-area identified has ***relatively strong countryside characteristics as the landscape is a mix of open arable and some more enclosed areas in particular locations****. However land along and* ***around Sandridgebury Lane penetrates into the north of St Albans to border existing development and settlement boundaries which contain it on at least two edges****. This sub-area* ***displays urban fringe characteristics*** *and greater levels of localised landscape enclosure as a result of existing planting and field patterns and activities within the Green Belt including outdoor recreation. The small scale enclosed character of the sub-area makes it a valuable part of the countryside, but also provides screened from views from the wider strategic parcel. However, given the scale of the* ***gap at 2.5km between St Albans and Harpenden, a reduction in the size of the strategic parcel would not significantly compromise the physical separation of settlements****. This land makes a limited or no contribution towards checking sprawl or preserving setting. "*

6.6 The December 2013 SKM Report converted this circle into a sub-area for assessment and this is identified in Figure 7.1. This covered an area from St Albans Girls School to the Hertfordshire Way (which then crosses the railway to form the southern boundary of Heartwood Forest). Within the February 2014 SKM Report, the southern part of this sub-area was recommended for potential Green Belt release as identified in Figure 6.3. The same area was subsequently proposed for Green Belt release by the Council, but with the addition of 3.5ha of playing fields to the south of The Old Albanians access drive. This was evidently required to form a suitable access strategy to serve 1,100 dwellings. This an area that SKM did not recommend for release and was added by the Council.

6.7 The formerly proposed North St Albans allocation is the area outlined in blue across the plans, which accompany this report. As a footnote there are other instances e.g. The Crown Estates East of Hemel (South) where the Council ultimately moved away from the recommendations of SKM to release more land from the Green Belt light of higher housing needs. Moreover, in respect of the North St Albans Allocation, its northern boundary (and the SKM recommendations) is perhaps a function more of land availability than technical justification. The land beyond the northern boundary is in the same ownership (St Albans Girls School) yet only the proposed allocation land was promoted in the Strategic Housing Land Availability Assessment.

6.8 Having undertaken an objective landscape appraisal within the earlier sections of this report, it is unclear why the SKM consideration set out paragraph in 6.4 has not been such consideration has not been applied to parcel 37. Both SA-S4 (parcel 38) and the site are of the same host landscape character area (Ayres End Valleys and Ridges B). As illustrated by **Plans EDP 1** to **4**, they exhibit many of the same physical characteristics, are both boarded by development to a comparable degree, and have to a degree a perceptual sense of an urban fringe landscape. **Image EDP 6.2**, illustrates, with consideration of the above, a more logical release of release of Green Belt to the north of St Albans.