




Land at Noke Side, Chiswell Green  
**LANDSCAPE AND GREEN BELT STATEMENT**

on behalf of DLA Town Planning Ltd  
December 2019



A	FINAL	LF	JBA	JBA	December 2019
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		 <p><b>JAMES BLAKE</b> ASSOCIATES</p>			

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# 1. INTRODUCTION

## 1.1 Scope

1.1.1 This Green Belt Statement has been prepared by James Blake Associates on behalf of DLA Town Planning Ltd. to assess the contribution that an area of land to the west of Noke Side, Chiswell Green, makes to the five nationally defined purposes of Green Belt. The Site location is shown on **Figure 1**.

1.1.2 The Statement has been prepared with reference to the National Planning Policy Framework, the St Albans City and District Draft Local Plan and the Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council Green Belt Review Purposes Assessment Report.

## 1.2 Background and Site Context

1.2.1 The Site's boundaries and context are shown in **Figure 2**. The area (approximately 1.1ha) is regular in shape and comprises paddock land as well as sheds and a small area of hardstanding. The land is privately owned and is enclosed by trees and hedgerows on the southern, eastern and western boundaries. The principle features of the Site are shown on **Figure 3: Site Photos**.

1.2.2 The Site is located in the village of Chiswell Green, to the east of Miriam Lane and west of Noke Side. The wider landscape includes mainly arable fields and pastures with scattered woodland. 'Horsiculture' is also prevalent within the local landscape.

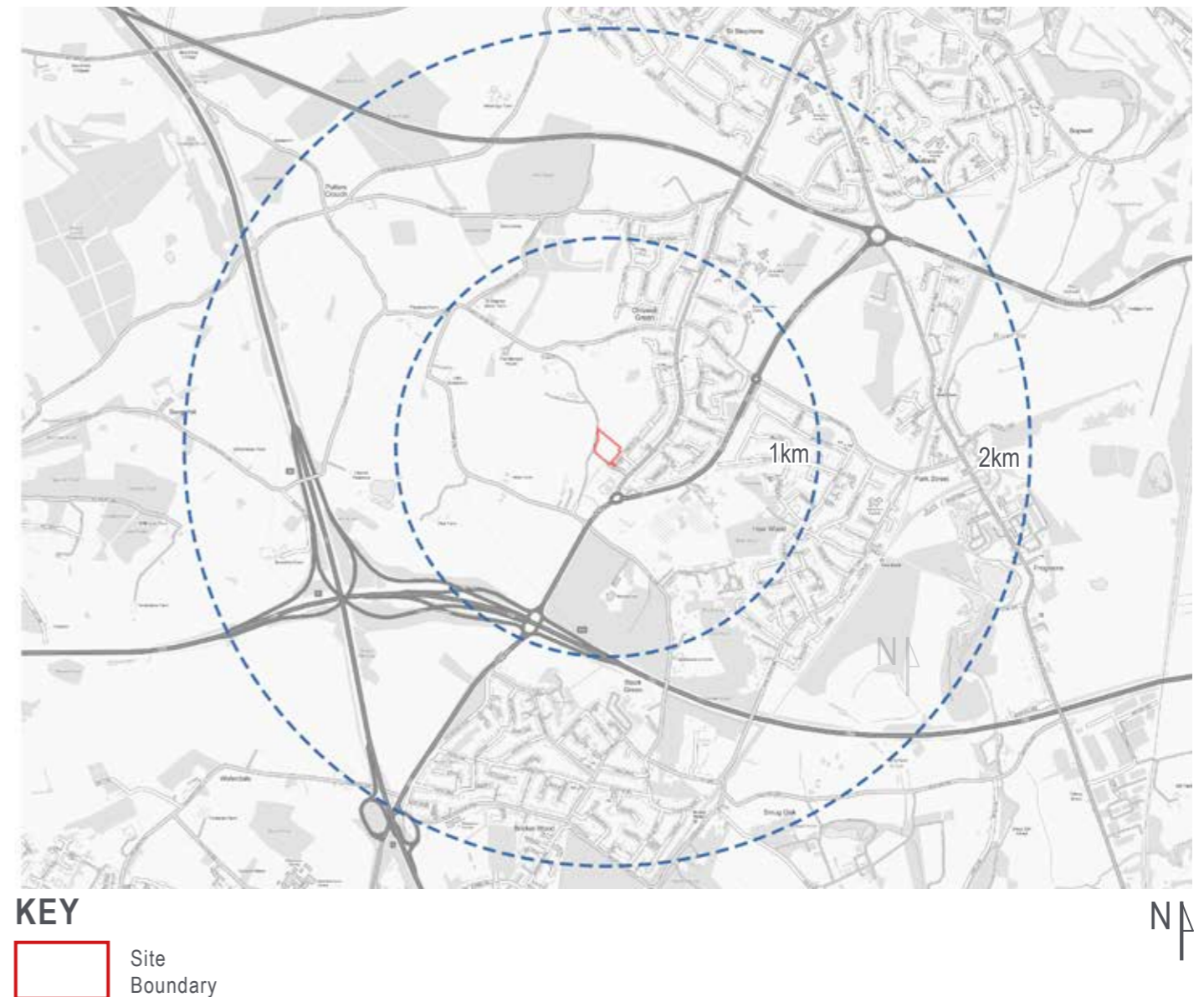
1.2.3 The Site lies immediately adjacent to the existing settlement edge of Chiswell Green and as such relates well to the existing settlement edge.

1.2.4 The Site is well screened in views from the open countryside to the south and west by field boundary vegetation surrounding the Site and within the wider landscape (see **Figure 10 - Representative Viewpoints**).

1.2.5 The area is incorporated in to the Green Belt, which also includes much of the surrounding area until it meets the urban edge of Chiswell Green to the east. The Site and surrounding area is identified in the Green Belt Review as parcel GB25 'Green Belt Land West of Chiswell Green'. The location of the Site in relation to the larger Green Belt parcel is shown on **Figure 5**. A full assessment of the Site's contribution to Green Belt Purposes is outlined in **Section 3**.

## 1.3 Site History

1.3.1 The Site has been historically submitted in the Call for Sites and is identified as Parcel No. 408. The 2016 Strategic Land Availability Assessment (SHLAA) identified the Site as having potential for development as part of the wider Strategic Sub-Area (SA-S8 - Enclosed land at Chiswell Green Lane at Chiswell Green), taken from the Green Belt Review Purposes Assessment (2013).



**Figure 1: Site Location Plan.** Not to Scale  
Source: Ordnance Survey Open Data



Figure 2: Site Context. Not to scale @A3  
Source: Open Layers/Bing Maps





**KEY**



Site Boundary



Site View Location Points - Refer to Views A - K

Figure 3: Site Photos A-K. Not to scale @A3

Source: Open Layers/Bing Maps



Approximate extent of Site



View A: View north-west from within the Site

Approximate extent of Site



View B: View north-west from existing access track

Approximate extent of Site



View C: View north-west from south-eastern site boundary

Figure 3: Site Photos A-C.  
Date: 29.11.2019



View D: View north-east from northern site boundary

←----- Approximate extent of Site ----->



View E: View south-east from within the Site

←----- Approximate extent of Site ----->



View F: View south-east from within the Site

Figure 3: Site Photos D-F.  
Date: 29.11.2019

Approximate extent of Site



View G: View south-east from north-western site boundary

Approximate extent of Site



View H: View south-east from within the Site

Approximate extent of Site



View I: View towards the south-western boundary from within the Site

Figure 3: Site Photos G-I.

Date: 29.11.2019.

Approximate extent of Site



View J: View north-east from within the Site

Approximate extent of Site



View K: View north from within the Site

Figure 3: Site Photos J-K.  
Date: 29.11.2019.

## 2. PLANNING POLICY CONTEXT

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### 2.1 National Planning Policy

- 2.1.1 The NPPF sets out the Government's planning policies for England and how these are expected to be applied. The NPPF sets out a clear presumption in favour of sustainable development, which should be seen as a 'golden thread' running through plan-making and decision-taking. There are three dimensions to sustainable development: economic, social and environmental.
- 2.1.2 NPPF Section 13: Protecting Green Belt land states that *'The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence'*.
- 2.1.3 Green Belt is considered to perform five purposes:
- To check the unrestricted sprawl of large built-up areas;
  - To prevent neighbouring towns merging into one another;
  - To assist in safeguarding the countryside from encroachment;
  - To preserve the setting and special character of historic towns; and
  - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.1.4 The NPPF emphasises in Paragraph 136 that local planning authorities should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. It goes on to state that *'Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans'*.
- 2.1.5 Paragraph 143 of the NPPF states, as with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.
- 2.1.6 Paragraph 137 of the NPPF states that: *'Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:*
- a) *makes as much use as possible of suitable brownfield sites and underutilised land;*
  - b) *optimises the density of development... including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and*
  - c) *has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground'*.
- 2.1.7 Paragraph 139 of the NPPF provides guidance for local planning authorities when defining Green Belt boundaries. As previously highlighted there is a need to redefine the local Green Belt boundaries in order to release land for development

in order to reach the local housing growth targets. A key aspect is ensuring the permanence of the Green Belt is secured using physical features that are readily recognisable and likely to be permanent over the lifetime of the development plan.

- 2.1.8 Paragraph 141 states that *'once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land'*.

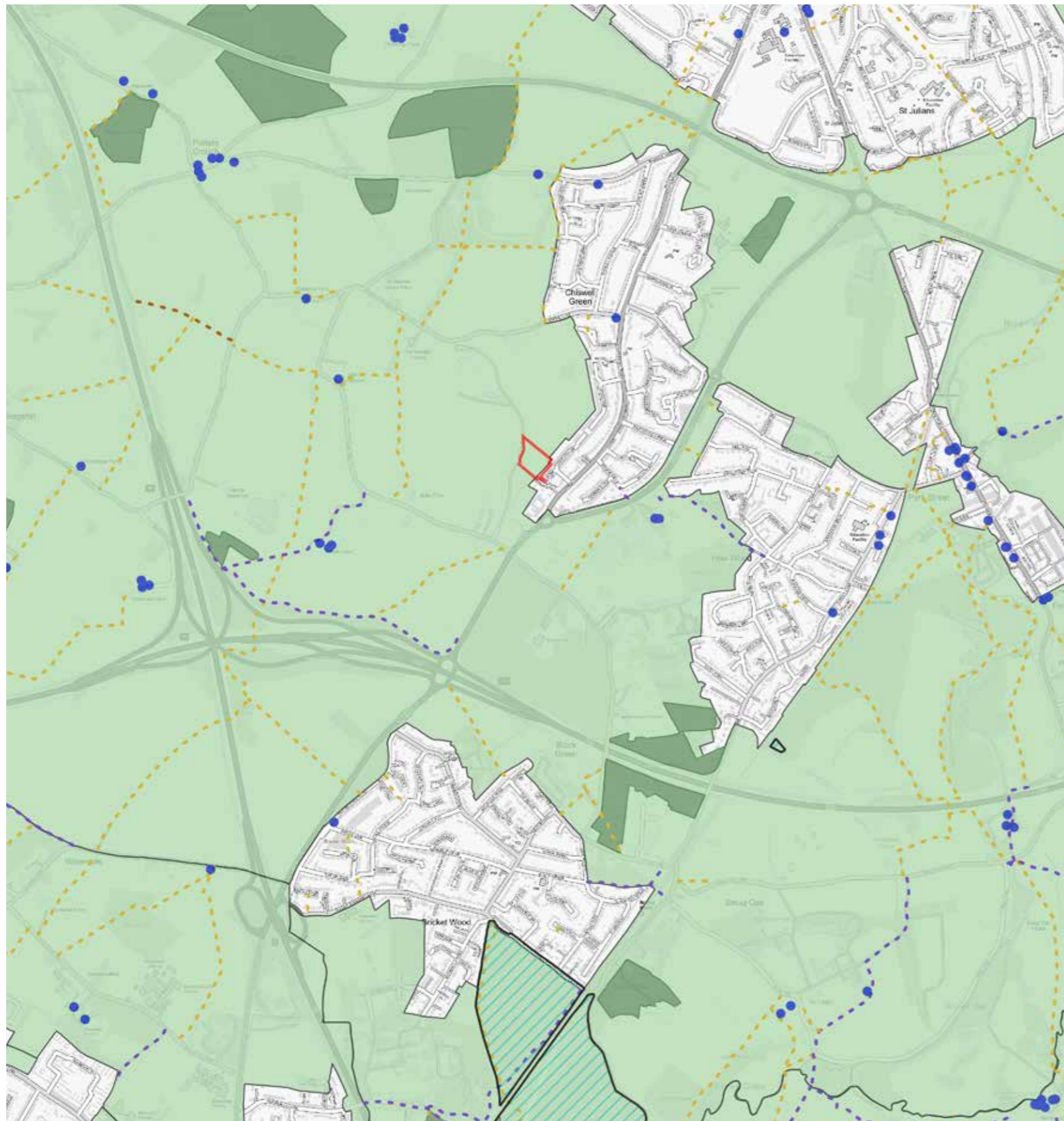
#### Landscape and Design

- 2.1.9 NPPF Section 7: Requiring Good Design sets out that good quality and inclusive design is a key aspect of sustainable development. As such all new developments should *'function well and add to the overall quality of the area...; 'establish a strong sense of place...; 'optimise the potential of the site to accommodate development, creating and sustaining an appropriate mix of uses (including green and other public space); 'respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation; and 'be visually attractive as a result of good architecture and landscaping'*. These principles are supported by NNPG 26: Design.

### 2.2 Local Planning Policy

#### **St Albans Local Plan**

- 2.2.1 The St Albans City and District Local Plan dates back to 1994 and is one of the oldest in the country. In 2007, a Direction was made saving specified policies of the District Local Plan Review 1994, these saved policies will remain in place until the new Local Plan is adopted. Relevant saved policies are outlined below:
- 2.2.2 Policy 1: Metropolitan Green Belt states that *'within the Green Belt, except for development in Green Belt settlements referred to in Policy 2 or in very special circumstances, permission will not be given for purposes other than that required for:*
- a) *mineral extraction;*
  - b) *agriculture;*
  - c) *small scale facilities for parks and recreation;*
  - d) *other uses appropriate to rural areas;*
  - e) *conversion of existing buildings to appropriate new uses, where this can be achieved without substantial rebuilding works or harm to the character and appearance of the countryside.*
- New development within the Green Belt shall integrate with the existing landscape. Siting, design and external appearance are particularly important and additional landscaping will normally be required'*.
- 2.2.3 Policy 2: Settlement Strategy identifies Chiswell Green as a 'specified settlement', a larger village generally of 2,000-5,000 population which is excluded from the Green Belt. In particular the council will seek to safeguard the character of specified settlements and green spaces within them. *'Proposals in specified settlements must be compatible with the maintenance and enhancement of their character and Green Belt boundaries. In particular, infill housing development will be permitted only where consistent with this approach'*.
- 2.2.4 Policy 69: General Design and Layout states that *'all development shall have an adequately high standard of design taking into account the following factors:*

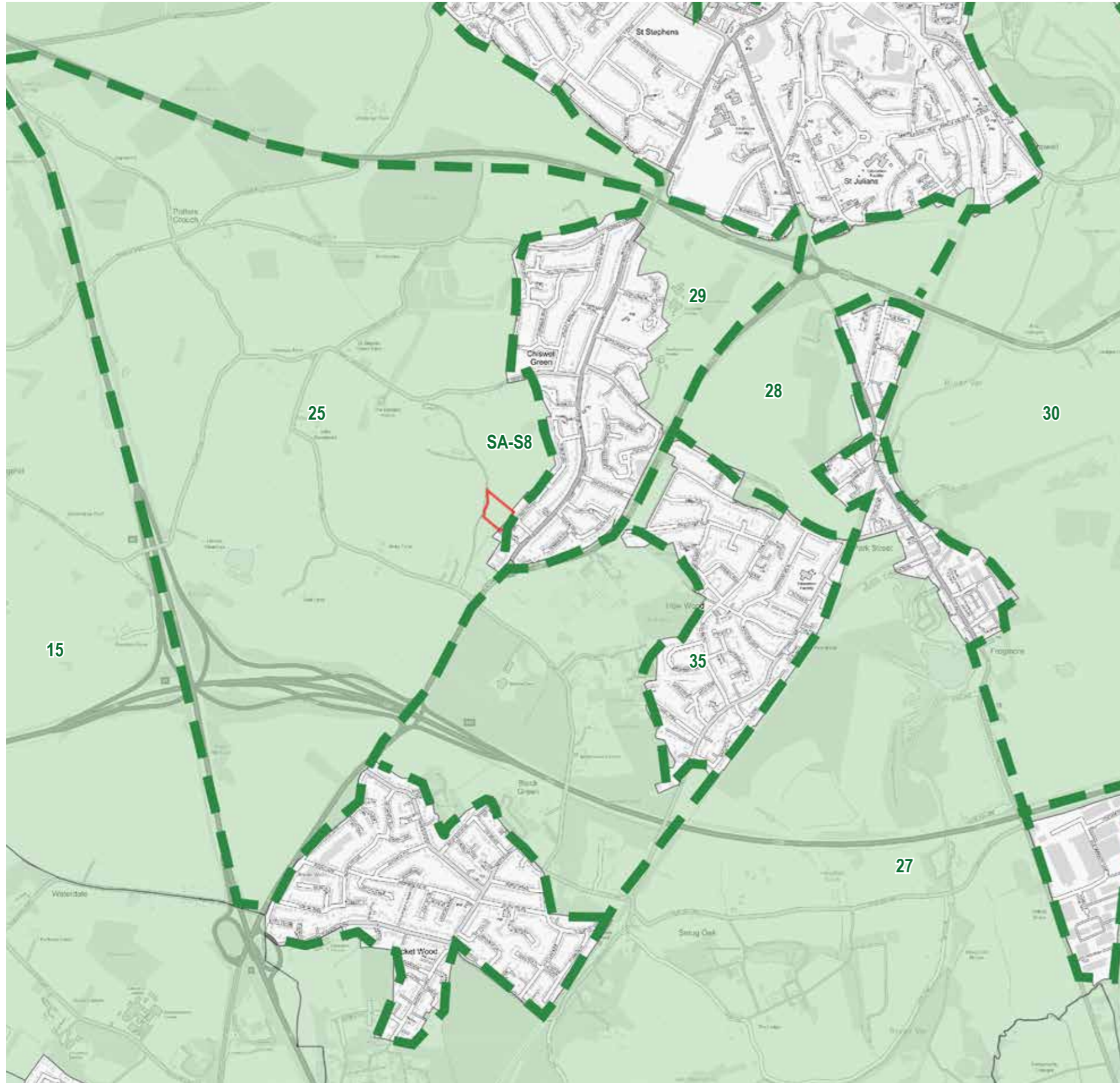


**KEY**

- Site Boundary:
- Existing Green Belt
- Ancient Woodlands
- Listed Building
- Sites of Special Scientific Interest
- PRoW Footpath
- PRoW Bridleway
- PRoW Byway



**Figure 4: Policy Context**  
 1:20,000 @ A3  
 Source: Ordnance Survey Open Data



**KEY**



Site Boundary



Existing Green Belt



Green Belt Parcel  
 (As outlined in the Green Belt Review Purposes Assessment prepared for Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council)



**Figure 5: Extract of Green Belt Parcels**

1:20,000 @ A3

Source: Ordnance Survey Open Data

## 2. PLANNING POLICY CONTEXT Continued.

*i) Context - The scale and character of its surroundings in terms of height, size, scale, density or plot to floorspace ratio...*

- 2.2.5 Policy 74: Landscaping and Tree Preservation states that the council will take account of the retention of existing landscaping and the provision of new landscaping when considering planning applications.
- 2.2.6 Policy 104: Landscape Conservation states that *'the Council will seek to preserve and enhance the quality of landscape throughout the District...'*
- 2.2.7 Policy 105: Landscape Development and Improvement states that *'the District Council will promote and seek to secure landscape creation, improvement and enhancement throughout the Green Belt countryside. Priority will be given to the urban fringe and particularly in the Landscape Development Area (LDA) shown on the Proposals Map...'* (Note: the Site lies within the LDA)

### Draft Strategic Local Plan 2011-2031

- 2.2.8 The former Strategic Local Plan, which was discarded by the High Court in July 2017, made provision for only 436 new homes each year, including a total of 4,000 homes in the Green Belt throughout the plan period. Government pressure and a new standardised methodology for calculating housing need has led to revised projections in the Emerging Local Plan of around 900 dwellings per year. There is therefore a clear rationale for considering the contribution to the purposes of the Green Belt made by individual sites of this scale as well as the much larger land parcels assessed in the Green Belt Review Purposes Assessment.

### Draft St Albans and District Local Plan 2020-2036

- 2.2.9 St Albans City and District Council published its Regulation 18 Draft Local Plan in September 2017. Policies of relevance to the Site include:
- 2.2.10 Policy S1 - Spatial Strategy and Settlement Hierarchy. Chiswell Green is identified as a 'large village', a settlement excluded from the Green Belt. The scale and density of development in large villages will generally be lower than in the Category 1 settlements. This is to reflect the lower level of services available and in order to retain their particular character.
- 2.2.11 Policy S2 - Development Strategy. *'Government figures for housing need, and appropriate approaches to employment land provision, create the exceptional circumstances that necessitate major development in locations previously designated as Green Belt. All Category 1 settlements and one Category 2 settlement (Chiswell Green) will be expanded at 'Broad Locations' for development.'*
- 2.2.12 Policy S3 - Metropolitan Green Belt. *'The Council attaches great importance to the Metropolitan Green Belt, which will be protected from inappropriate development'. 'Green Belt in the District performs important national policy objectives as part of the Metropolitan Green Belt (MGB). The Green Belt is also regarded as performing an important local objective for maintaining the existing settlement pattern and the individual identity of settlements, as far as reasonably possible.'*
- 2.2.13 Policy L29 – Green and Blue Infrastructure, Countryside, Landscape and Trees. *'The District's landscapes will be conserved, managed, and where appropriate enhanced, with reference to national and local Landscape Character Assessment (LCA), Landscape Conservation Area designations, Historic Landscape Characterisation (HLC) and Heritage Partnership Agreements.*

*Landscape and Visual Impact assessments will be required for all major developments and any other developments which may have a significant effect on the local landscape'.*

*'Existing woodlands, trees and landscape features should be retained and protected as part of development schemes'.*

## 2.3 Green Belt Review Purposes Assessment

- 2.3.1 The Green Belt covers over 81% of St Albans District and is of *'critical importance in preventing urban sprawl and neighbouring towns and other settlements merging into one another'*.
- 2.3.2 The Green Belt Review Purposes Assessment prepared for Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council places the Site in Green Belt Parcel 25 - Green Belt Land to West of Chiswell Green.
- 2.3.3 Green Belt Parcel 25 is located to the west of Chiswell Green and extends to the south to Bricket Wood. The boundary to the north follows the A414 and to the west follows the M1. It is 522ha in size and forms an undulating chalk plateau with a number of gently sloping dry valleys.
- 2.3.4 The principal function/summary section states that this parcel makes a *'significant contribution towards safeguarding the countryside and maintaining the existing settlement pattern (providing gap between St Albans and Chiswell Green). Partial contribution towards preventing merging and preserving setting. Overall the parcel contributes significantly to 2 out of 5 purposes'*.
- 2.3.5 **Contribution to Green Belt Purposes**
- 2.3.6 An assessment of Parcel 25 against the purposes of Green Belt as set out in Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council Green Belt Review Purposes Assessment is outlined below:

- **Purpose 1: to check the unrestricted sprawl of large built-up areas:** Comments relating to this purpose state that the parcel is located away from the large built-up areas of London, Luton and Dunstable and Stevenage. Overall the parcel makes a limited to no contribution to this purpose.
- **Purpose 2: to prevent neighbouring towns merging into one another:** *'The parcel contributes to the strategic gap between St Albans and Watford. It is well maintained (relatively free of development) but contains the M25 and M1. The parcel is visible from the M1. There is no ribbon development although Butterfly World represents built development in the Green Belt. However, given the relationship between the parcel and the gap between Bricket Wood and Watford / Abbots Langley any reduction in openness would compromise the separation of settlements in physical and visual terms'*. The parcel is considered to make a partial contribution to this Green Belt purpose.
- **Purpose 3: to assist in safeguarding the countryside from encroachment:** *'The parcel displays typical rural and countryside characteristics in a mixture of arable and pasture medium sized fields bound by hedgerows and hedgerow trees. Ancient woodland and the coniferous plantation at Park Wood are located in the north. The M25, M1 and M10 represent the key urban influences which are highly audible intrusive. Settlement boundaries are generally strong. However Butterfly World represents development in the Green Belt to the west of Chiswell Green which interrupts the connection of land at the urban edge to the surrounding countryside. Land between this development and Chiswell Green displays higher levels of localised landscape enclosure. Levels of openness are generally high but subject to variation'*. The parcel is considered to make a significant contribution to this Green Belt purpose.
- **Purpose 4: to preserve the setting and special character of historic towns:** *'The parcel contains Potters Crouch Conservation Area. The Green Belt provides historic setting and views to and from the open countryside. However given the scale of the historic place contribution is partial.'* The parcel is considered to make a partial contribution to this Green Belt purpose.



## 2. PLANNING POLICY CONTEXT Continued.

2.3.7 In addition to the purposes set out in the NPPF the Green Belt Review Purposes Assessment also considers the following local Green Belt purpose:

- **To maintain existing settlement pattern:** 'The parcel contributes (with GB24B & GB29) to the primary local gap separating St Albans and Chiswell Green (2nd). This gap is narrow at 0.2km. It is well maintained (relatively free of development) and contains the M10 / A414. However landscape features and planting conceal the main road from settlements. There is limited visibility of the gap from the A414 however is evident from the Watford Road (B4630). The parcel also helps contribute (with GB26) to the secondary local gap between Chiswell Green and Bricket Wood (2nd). This gap is 1.1km. Given the scale of both gaps, any reduction would compromise the separation of settlements in physical and visual terms, as well as overall visual openness'. The parcel is considered to make a significant contribution to this Green Belt purpose.

2.3.8 The findings of the Stage 1 Green Belt Review Purposes Assessment is a strategic level assessment, its findings in terms of the extent of potential harm to the Green Belt are therefore not always applicable when applied to smaller, individual potential development sites adjacent to urban areas. A finer grained approach is therefore recommended in order to take into account localised variations in terms of how land performs against the five purposes of Green Belt.

### 2.4 St Albans Green Belt Review: Sites and Boundary Study

2.4.1 The St Albans Green Belt Review: Sites and Boundary Study was prepared in order to provide a detailed and robust assessment of eight strategic sub-areas in St Albans City and District that were considered to contribute the least towards the five Green Belt purposes, as identified in the Green Belt Review: Purposes Assessment. The Site is included in one of these sub-areas: Sub-Area S8: Land at Chiswell Green.

2.4.2 The Study states, in Chapter 10, relevant to the Site, that Strategic Parcel GB25, of which Sub-Area S8 forms the eastern part, 'significantly contributes towards 2 of the 5 Green Belt Purposes: it safeguards the countryside and maintains the existing settlement pattern (providing a gap between St Albans and Chiswell Green)'.

2.4.3 The report states that 'the sub-area identified on pasture land at Chiswell Green Lane displays particular urban fringe characteristics due to its proximity to the settlement edge and Butterfly World along Miriam Road to the west. This development bounds the outer extent of the pasture land and creates a physical barrier to the open countryside. The pasture land also displays greater levels of landscape enclosure due to localised planting along field boundaries. This creates potential to integrate development into the landscape with lower impact on views from the wider countryside and surroundings'. These characteristics are considered to be equally applicable to the Site.

2.4.4 The sub-area primarily comprises agricultural land uses with a combination of arable crops, in a large, open field pattern and pasture. Pasture is enclosed in a smaller field pattern but frequently in a very regular form using post and rail fences. Enclosure is provided by a combination of landform and vegetation. The gradual slope of the landform limits the enclosure it provides, but this is augmented by the artificial landform that surrounds and encloses Butterfly World. The area between Chiswell Green and Butterfly World includes small woodlands, copses and hedgerows, which (together with the made landforms around Butterfly World), provide a greater sense of enclosure.

2.4.5 Key visual sensitivities are likely to be localised and primarily associated with the adjacent residential edge of Chiswell Green.

2.4.6 Key landscape features that make a valuable contribution are the small areas of woodland to the west of Chiswell Green and remaining hedgerows. The eastern part of the sub-area is of lower sensitivity due to its relationship with the adjacent urban edge, the loss of field pattern and its isolation from surrounding countryside by Butterfly World.

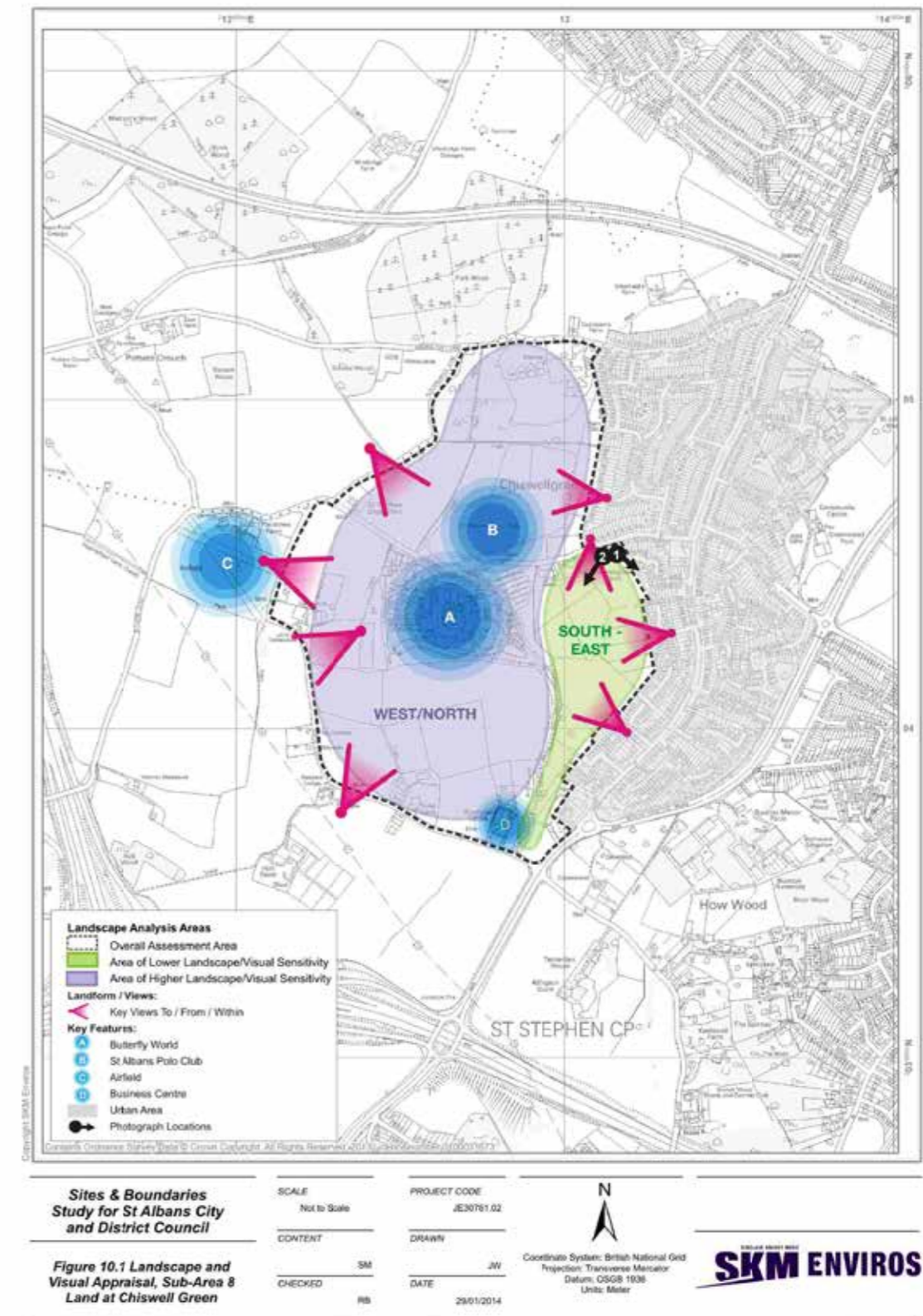


Figure 6: Landscape Sub-Area 8

NTS @ A3

Source: SKM Enviros

## 2. PLANNING POLICY CONTEXT Continued.

2.4.7 The Site lies within the eastern sub-area (see **Figure 6**). Consideration of the sensitivity of the sub-area (and specific parts within it) in relation to potential residential development, as informed by landscape character, settlement form, views and landscape value, is set out in the table below.

Element	
Landscape character	<ul style="list-style-type: none"> <li>Built development would affect openness of landscape character. However, the landform and vegetation provide enclosure, and would help contain and provide a framework for development.</li> <li>The land to the east of the access road to Butterfly World has more connection with the countryside to the west, but is separated from this by the road and this will increase as the young planting matures.</li> <li>Changes in the landscape have resulted in the loss of traditional boundaries and replacement with wooden post and rail fences. The remnant hedgerows and small areas of woodland comprise key features that help to maintain a sense of enclosure.</li> </ul>
Settlement form	<ul style="list-style-type: none"> <li>Development would be adjacent to the western edge of Chiswell Green and to the east of Butterfly World (and associated access).</li> </ul>
Views/visual features	<ul style="list-style-type: none"> <li>Key potential visual effects of new development would be at a local level.</li> <li>Notable effects would be in relation to residents on the western edge of Chiswell Green and dispersed properties within this part of the sub-area.</li> </ul>
Landscape value	<ul style="list-style-type: none"> <li>No landscape, cultural heritage or ecological designations.</li> </ul>
Overall evaluation	Lower sensitivity

2.4.9 Within the section titled 'Boundary Review' the report states that 'based upon the key findings of the assessment including landscape appraisal and sensitivity analysis, in addition to the consideration of the location of constraints and creation of sustainable patterns of development it is concluded that the most appropriate land for potential release from Green Belt for residential led development is the eastern part of the sub-area'. This is the area bounded by a solid yellow line in **Figure 7** overleaf, the southernmost boundary of which runs along the northern site boundary. The Illustrative Layout also indicates that the Site comprises woodland and is therefore a strong boundary feature, however this is not the case. The Site is well vegetated along its southern and western boundaries, with the eastern boundary defined by the existing settlement edge of Chiswell Green. Vegetation is predominantly limited to the Site boundaries, and therefore the Site is a logical extension to the area considered for Green Belt release to the north.

2.4.10 Overall, the eastern sub-area 'does not significantly contribute towards any of the five Green Belt purposes. It makes a partial contribution towards safeguarding the countryside from encroachment. It makes a limited or no contribution towards checking sprawl, preventing merging, preserving setting and maintaining the existing settlement pattern'.

2.4.11 The only logical reason that the Site was excluded from the area of potential Green Belt release is that was perceived as woodland, however as previously stated this is not the case.

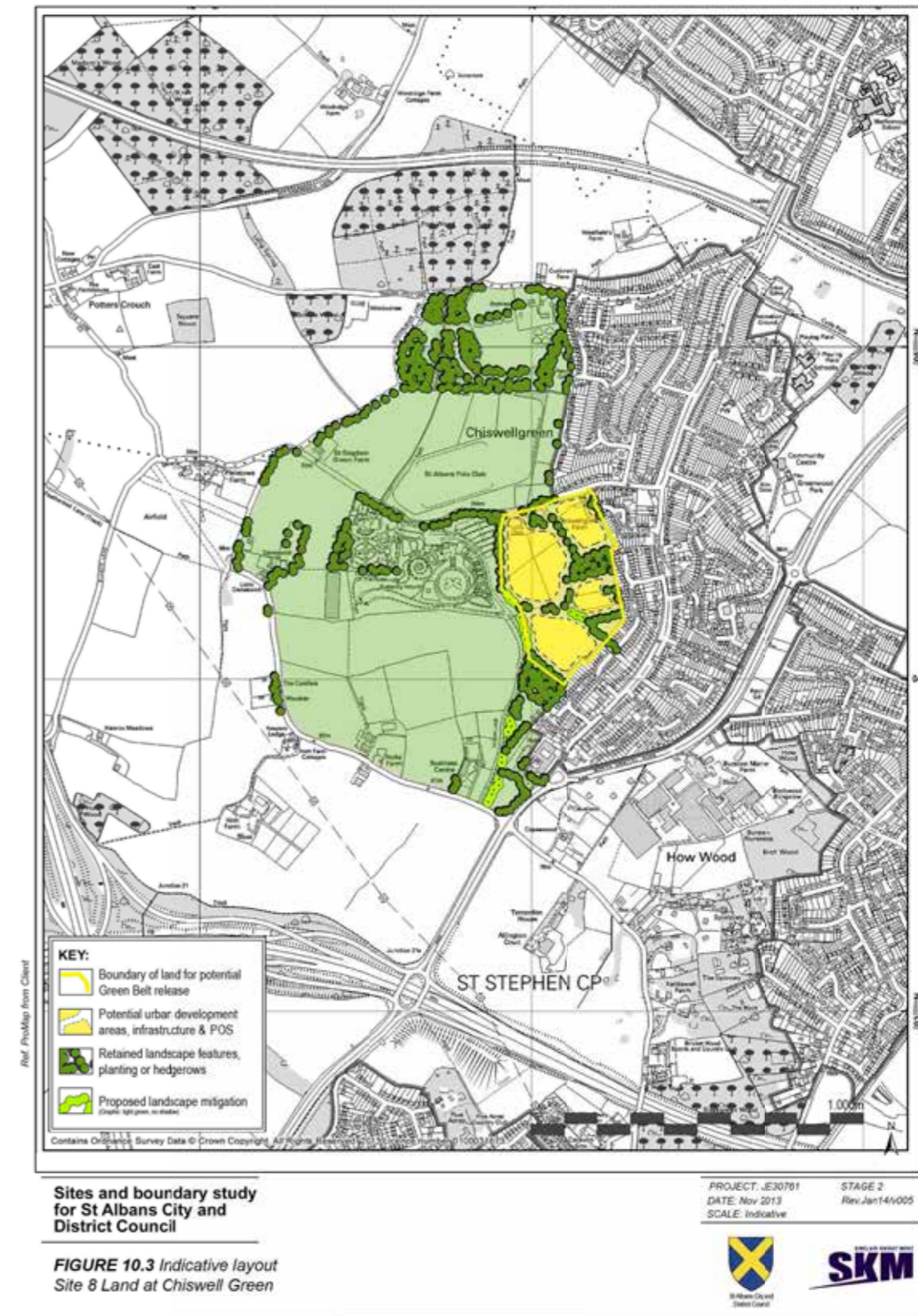


Figure 7: Area of Potential Green Belt Release at Chiswell Green  
NTS @ A3  
Source: SKM Enviro

## 3. LANDSCAPE CONTEXT

### 3.1 Scope

- 3.1.1 In accordance with National and Local guidance, this section considers the existing landscape character of the Site and its environs.
- 3.1.2 The character of the landscape evolves over time as a result of the interaction of human activity and the natural environment (people and place). Factors used to assess landscape character include:
- Physical – geology, landform, climate, soils, fauna and flora;
  - Cultural and Social – land use, settlement, enclosure & history; and
  - Aesthetics – colour, texture, pattern, form and perception.
- 3.1.3 It should be noted that landscape is a continuum and character does not in general change abruptly on the ground. More commonly, the character of the landscape will change gradually rather than suddenly, and therefore the boundaries between both LCTs and LCAs should be considered to reflect zones of transition.
- 3.1.4 The published Landscape Character Types (LCTs) and Landscape Character areas (LCAs) from the national to county level within the study area are shown on **Figure 8**.

### 3.2 Landscape Baseline

#### National

- 3.2.1 At the national level (Natural England, 2012) the study area lies within the Northern Thames Basin (NCA 111). The Northern Thames Basin National Character Area (NCA) extends along the rising land of the Thames Estuary from Hertfordshire to the Essex Coast. The area is large and diverse with an overarching character of agricultural land interspersed with woodland, dissected by rivers and influenced by urban areas including London.
- 3.2.2 Key characteristics of the Northern Thames Basin (LCA 111) include:
- *'The landform is varied with a wide plateau divided by river valleys. The prominent hills and ridges of the 'Bagshot Hills' are notable to the northwest and extensive tracts of flat land are found in the south.*
  - *Characteristic of the area is a layer of thick clay producing heavy, acidic soils, resulting in retention of considerable areas of ancient woodland.*
  - *Areas capped by glacial sands and gravels have resulted in nutrient-poor, free-draining soils which support remnant lowland heathlands, although these are now small. Areas that have alluvial deposits present are well drained and fertile.*
  - *The water bearing underlying Chalk beds are a main source of recharge for the principal London Basin Chalk aquifer.*
  - *A diverse landscape with a series of broad valleys containing the major rivers - Colne and Lea, and slightly steeper valleys of the rivers Stour, Colne and Roman. Numerous springs rise at the base of the Bagshot Beds and several reservoirs are dotted throughout the area.*
  - *The pattern of woodlands is varied across the area and includes considerable ancient semi-natural woodland. Hertfordshire is heavily wooded in some areas as are parts of Essex, while other areas within Essex are more open in character. Significant areas of wood pasture and pollarded veteran trees are also present.*

- *The field pattern is very varied across the basin reflecting historical activity. Informal patterns of 18th-century or earlier enclosure reflect medieval colonisation of the heaths. Regular planned enclosures dating from the Romano-British period are a subtle but nationally important feature on the flat land to the south-east of the area. In the Essex heathlands 18th- and 19th-century enclosure of heathlands and commons followed by extensive 20th-century field enlargement is dominant.*
- *Mixed farming, with arable land predominating in the Hertfordshire plateaux, parts of the London Clay lowlands and Essex heathlands. Grasslands are characteristic of the river valleys throughout. Horticulture and market gardening are found on the light, sandy soils of former heaths in Essex, particularly around Colchester, along with orchards, meadow pasture and leys following numerous narrow rivers and streams.*
- *The diverse range of semi-natural habitats include ancient woodland, lowland heath and floodplain grazing marsh and provide important habitats for a wide range of species including great crested newt, water vole, dormouse and otter.*
- *Rich archaeology including sites related to Roman occupation, with the Roman capital at Colchester (Camulodunum) and City of St Albans (Verulamium) and links to London. Landscape parklands surrounding 16th- and 17th-century rural estates and country houses built for London merchants are a particular feature in Hertfordshire.*
- *The medieval pattern of small villages and dispersed farming settlement remains central to the character of parts of Hertfordshire and Essex. Market towns have expanded over time as have the London suburbs and commuter settlements, with the creation of new settlements such as the pioneering garden city at Welwyn and the planned town at Basildon.*
- *Brick-built dwellings are characteristic from the late 17th century onwards. Prior to this dwellings and farm buildings tended to be timber built with weatherboarding, now mainly painted white but traditionally black or tarred, and whitewashed plaster walls.'*

#### County Landscape Character Assessment

- 3.2.3 At the county level (Hertfordshire Landscape Character Assessment, 2005), the Site lies within Landscape Character Area (LCA) 10: St Stephen's Plateau. The area is described as *'a working farmed landscape of predominantly open arable fields which slopes from north-west to south-east. To the north several large mixed woodlands create a local sense of enclosure. Elsewhere hedgerows are sparse with few individual field trees. The settlement pattern is dispersed, connected by a series of narrow winding lanes. The historic land-use pattern is overlaid by a strong network of motorways and junctions. Wooded horizons are common to the north, west and south, whilst to the east the built edge of St Albans and Chiswell Green is prominent'*.
- 3.2.4 The key characteristics of this LCA are:
- *'undulating plateau to north, gently sloping to south east*
  - *medium/large open arable fields throughout*
  - *visually interlocking mixed woodlands to north*
  - *significant extent of motorways and interchanges with mass associated earthworks, lights and traffic*
  - *narrow winding lanes with sparse clipped hedgerows*
  - *built edge of urban settlements to east*
  - *dispersed settlement with scattered farmsteads'*

### 3. LANDSCAPE CONTEXT Continued.

3.2.5 In terms of visual and Sensory Perception, *'the area is widely visible from outside, including open views from the urban areas to the east . The scale of the landscape is medium to large. To the north the woodland provides a stronger sense of enclosure. The noise of the motorways is relentless and discordant. The landscape type is relatively common in the county. The most distinctive feature is the wooded farmland to the north on the plateau'*. The raw built edges of Chiswell Green and How Wood represent significant suburban impact.

3.2.6 The 'Condition' of the character area is assessed within the LCA as Moderate and the 'Robustness' of the character area as Weak, leading to a recommendation that the 'Strategy and Guidelines for Managing Change' should ' Improve and Reinforce ' .

#### Local Landscape Context

3.2.7 The following key characteristics were identified during the field survey:

- The landscape surrounding the Application Site is one of variable sized, generally medium to large fields with geometric boundaries of varying condition. There is moderate tree cover, both blocks and belts of woodland and hedgerow trees, and the landscape is gently undulating. This is considered to give rise to a landscape of medium scale.
- The Application Site has a relatively simple landform, and is broadly flat at approximately 88m AOD. The Site is set within a gently undulating landscape.
- Field boundaries surrounding the Application Site and in the local area are generally delineated with vegetation. As a result, some views in the local area are substantially foreshortened, while others are longer-reaching. The Application Site itself is considered to have a high level of enclosure.
- The Application Site lies within a peri-urban landscape with numerous signs of human influence including the existing settlement edge of Chiswell Green, electricity pylons and the M1. Towards the west of the study area the sense of tranquillity decreases significantly with traffic on the M1 clearly audible.
- Skylines in the area are generally formed by a combination of tree belts, woodlands and hedgerow trees, and by rising landform in some longer distance views across the undulating landscape.
- The Site is located within a gently undulating landscape with strong presence of vegetation in the form of hedgerows, tree belts and woodlands. This results in limited inter-visibility between the Application Site and much of the surrounding landscape, though there are occasional longer distance views, notably to the north-west.

### 3.3 Landscape Management Guidelines

3.3.1 Landscape management guidelines are provided at each level of landscape characterisation as described above.

#### National: NCA Statements of Environmental Opportunity

3.3.2 Statements of Environmental Opportunity for the Northern Thames Basin (NCA 111) of relevance to the proposal include:

- *'SEO 3: Protect and appropriately manage the historic environment for its contribution to local character and sense of identity and as a framework for habitat restoration and sustainable development, ensuring high design standards (particularly in the London Green Belt) which respect the open and built character of the Thames Basin. Enhance and increase access between rural and urban areas through good green infrastructure links to allow local communities recreational, health and wellbeing benefits. For example, by:*
  - *Planning for future pressure from urban expansion and urban-related development, major roads and other infrastruc-*

*ture as a result of the expansion of Stansted and Luton international airports (impacting from adjacent NCAs) and the impact of strategic growth in and around the NCA;*

- *Ensuring positive management of land that may be developed in the future to preserve the character of the area and not adversely affect the rural areas that provide many resources, including food provision, carbon sequestration and recreation for the rural and urban communities.*

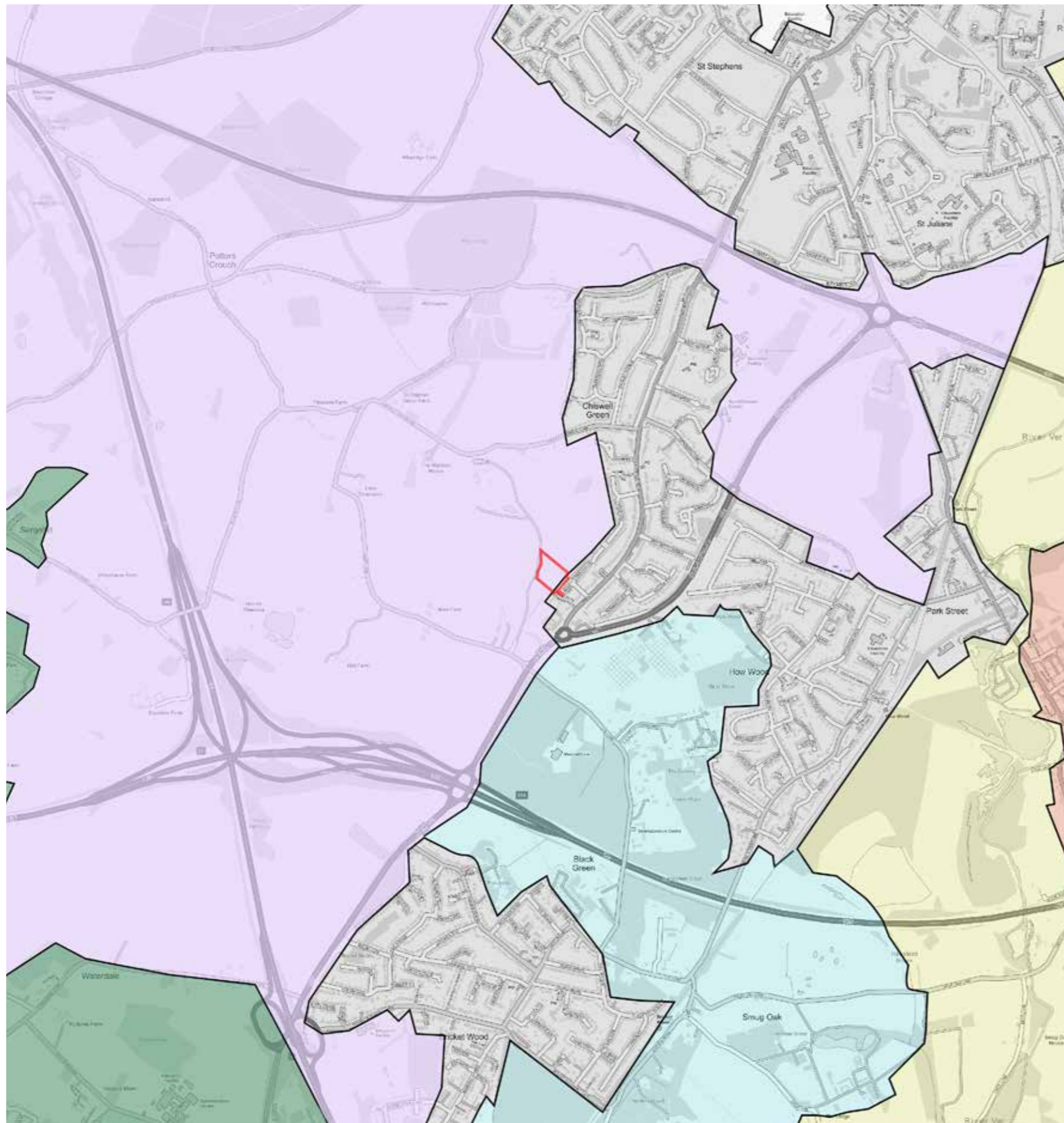
- *SEO 4: Manage and expand the significant areas of broadleaf woodland and wood pasture, and increase tree cover within urban areas, for the green infrastructure links and important habitats that they provide, for the sense of tranquillity they bring, their ability to screen urban influences and their role in reducing heat island effect and sequestering and storing carbon. For example, by:*

- *Promoting the establishment of a coherent and resilient network of treescapes (native woodland, wood pasture, parkland, coppice, scrub, field trees and hedgerows) through expanding and linking existing woodland with areas of new planting.*
- *Maintaining the diverse appearance of the landscape and shield developments and infrastructure from the wider landscape. This character should be maintained within any future developments that are built'.*

#### County Guidelines

3.3.3 The strategy and guidelines for managing change within the St Stephen's Plateau LCA are to:

- *'support the Watling Chase Community Forest in the realisation of its objectives for the area*
- *promote hedgerow restoration and creation throughout the area to provide visual and ecological links between existing and proposed woodland areas. Pattern to follow historic field boundaries where possible*
- *promote the creation of a network of new woodlands in the open arable landscape, particularly with a view to visually integrating the intrusive motorways and existing urban fringe development. Develop a mix of medium to large woods near the motorways and urban areas (developing the existing pattern to the north ) and also smaller copses linking with hedgerow restoration on the open arable areas, emphasising topographical variation*
- *promote appropriate woodland management for existing plantation woodlands, including encouraging the replacement of softwoods with indigenous native deciduous communities, hedgebank management and reestablishing a rich ground flora*
- *improve public access arrangements to woodlands with attention to car park design and safety*
- *promote crop diversification and the restoration of mixed livestock/arable farming where possible. Include equestrian uses where feasible*
- *broaden the range of recreational opportunities*
- *ensure all existing and proposed recreational land uses include appropriate measures to manage and enhance the existing landscape setting and historical and ecological value. Particular attention should be given to ensure earthwork proposals complement natural landform patterns'.*



**KEY**

- Site Boundary
- LCA 9: Bedmond Plateau
- LCA 10: St Stephens Plateau
- LCA 17: Ver/Colne River Valley
- LCA 18: Bricket Wood
- LCA 19: Vale of St Albans



**Figure 8: Landscape Character Areas**  
 1:20,000 @ A3  
 Source: Ordnance Survey Open Data

## 4. VISUAL CONTEXT

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### 4.1 General

4.1.1 The following section provides an assessment of views to the Site from within the study area. Photographs were taken in November 2019 representing a near worst case scenario in terms of the level of screening provided by existing vegetation.

### 4.2 The Visual Envelope of the Site

4.2.1 The Visual Envelope (VE) comprises open countryside with scattered settlement including villages and scattered farms and is accessed via a number of lanes along with an extensive network of Public Rights of Way. The extent of the visual envelope is shown in **Figure 9**. This includes the primary visual envelope, from which there will be a noticeable change to the view should the Site be developed, and the secondary visual envelope where change will be less apparent.

4.2.2 The combination of rising topography and increasing woodland cover to the north and north-west of the Site and the settlement edge of Chiswell Green to the east of the Site result in the Site being largely screened from the surrounding landscape. Near distance views towards the Site are very limited as a result of the existing settlement edge and a lack of public access to Miriams Lane.

#### 4.2.3 Views from the Site

4.2.4 Hedgerows and trees on the Site boundaries make it visually enclosed to the west and south. To the east and south-east the site is enclosed by existing settlement of Chiswell Green comprising residential housing with associated trees and hedges and a hotel site. The boundary facing north is visually open onto the adjacent parcel, with long distance views screened by the vegetation within the adjacent parcel. There are glimpses towards the Chiswell Green Lane from the north-west corner of the site, however the view is interrupted by sheds and buildings associated with the riding school and other "horsiculture" detracting features. There are barely discernible glimpses through the hedge along the western boundary when viewed directly next to the boundary hedge in winter conditions, however these are then blocked by the topography of the land towards the PROW St Stephens 028. These glimpses are not discernible from further away from the boundary due to the density of the existing vegetation.

### 4.3 Representative Views

4.3.1 Viewpoints 1-9 (see **Figure 10**) are representative views taken from the study area. The nature of existing views and visibility towards the Site are considered below.

#### View 1

4.3.2 In View 1 from Chiswell Green Lane there are clear views across the extent of sub-area S8. From this point the Site itself is barely discernible as it is set beyond layers of intervening vegetation, including a small area of woodland to the north-east of the Site.

#### View 2

4.3.3 In Viewpoint 2, from PROW St Stephen 028, the Site is again barely discernible and is set beyond layers of intervening vegetation within the grounds of the Royal Entomological Society and within the grounds of the Garden of the Rose.

#### View 3

4.3.4 Similarly, the Site is barely discernible from Viewpoint 3. This viewpoint was taken from PROW St Stephen 021, close to

the junction with St Stephen 080. The Site is set beyond layers of intervening vegetation and as the footpath runs through Scrubs Wood the footpath has a fence on either side, channelling views towards the south/south-west and away from the Site.

#### View 4

4.3.5 Viewpoint 4 is taken from the edge of PROW St Michael 012, close to the junction with Blunts Lane. From this viewpoint on the rising ground the prominent peri-urban feature of the view is the existing shed to the north of Butterfly World. The Site is set beyond the building and the conifer plantation beyond, and as such is barely discernible from this point.

#### View 5

4.3.6 Viewpoint 5 is also taken from PROW St Michael 012. Similarly to Viewpoint 4, the prominent peri-urban feature of the view is the existing shed to the north of Butterfly World. The Site is set beyond the building and the conifer plantation beyond, and as such is barely discernible from this point.

#### View 6

4.3.7 Viewpoint 6 is taken from the PROW St Stephen 043 near the crossing with Noke Lane. The site is not visible due to topography of the land and vegetation.

#### View 7

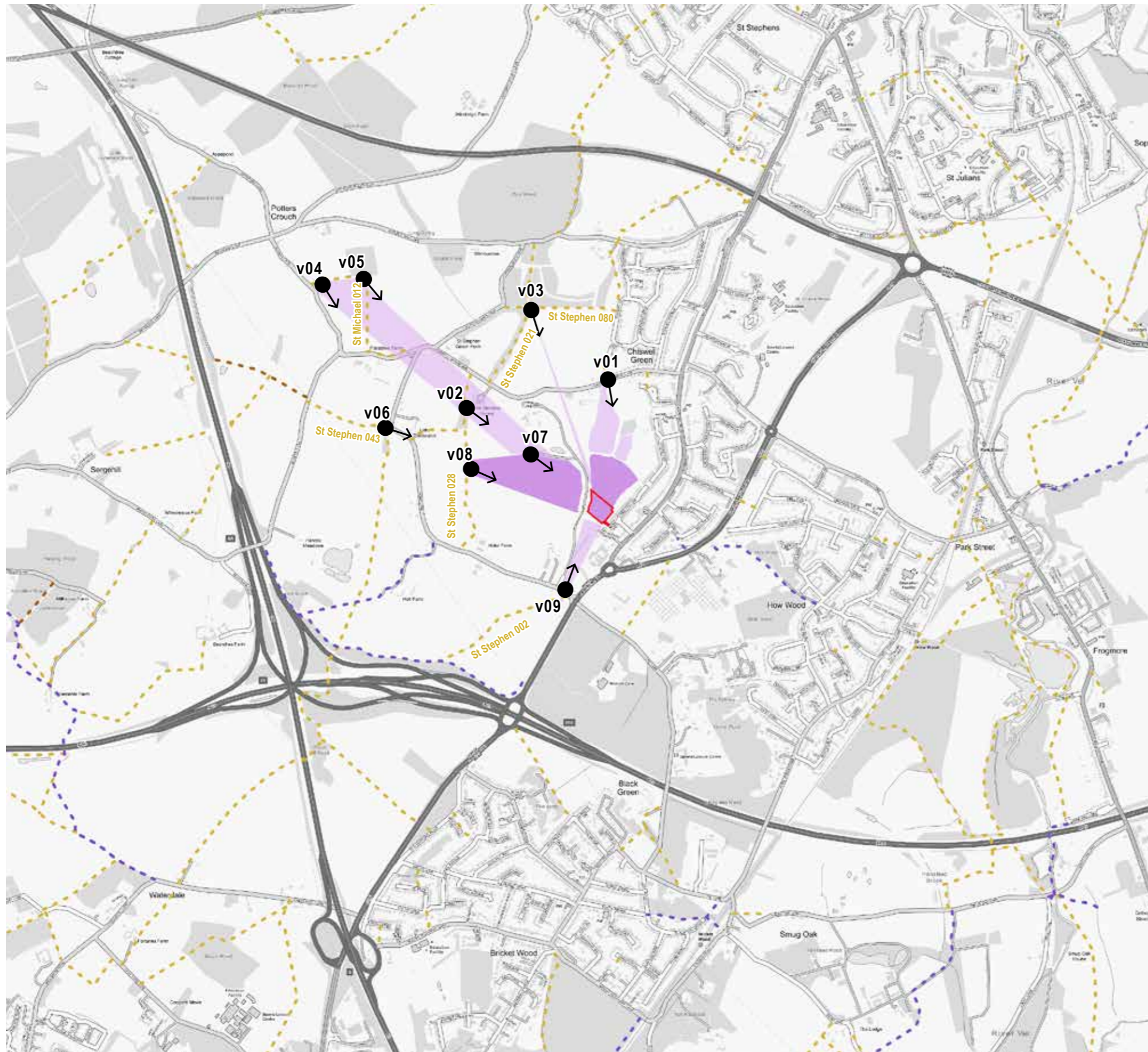
4.3.8 In this viewpoint from area east of PROW St Stephen 028 (off track) directly south of the the Entomology Society site. Site located beyond layers of intervening vegetation and only the prominent tree crowns and the hedge to the northern boundary of the site can be seen, but not the site itself. The existing settlement edge of Chiswell Green is clearly visible in the distance. Should the Site be released from the Green Belt and come forwards for development, any development would be seen in conjunction with the existing settlement edge of Chiswell Green.

#### View 8

4.3.9 In this viewpoint from PROW St Stephen 028 there are glimpsed views towards the Site, and the existing settlement edge of Chiswell Green is clearly visible in the distance. There are two existing oak trees which appear are a prominent feature of the view, the Site is located in close proximity to these oak trees. Should the Site be released from the Green Belt and come forwards for development, any development would be seen in conjunction with the existing settlement edge of Chiswell Green and other built form such as Noke Lane Business Centre.

#### View 9

4.3.10 From Viewpoint 9 the Site (and adjoining properties), located at a lower elevation, are barely discernible beyond layers of intervening vegetation. As highlighted within this view, close to the existing settlement edge land use is peri-urban in character, with the Noke Side Business Centre clearly visible in this view. Further west the landscape is more rural and open in character.



**KEY**

- Site Boundary
- Approximate extent of Primary Visual Envelope
- Approximate extent of Secondary Visual Envelope
- v01** ← Representative Viewpoints - Refer to Photographs v01 to v09
- PRoW Footpath
- PRoW Bridleway
- PRoW Byway

**Figure 9: Representative Viewpoint Locations**  
 1:20,000 @ A3  
 Source: Ordnance Survey Open Data





v01: View south from Chiswell Green Lane



v02: View south-east from PRow St Stephen 028



v03: View south-east from PRow St Stephen 021

Figure 10: Representative Views v01 to v03.  
Date: 29.11.2019



v04: View south-east from PRow St Michael 012



v05: View south-east from PRow St Michael 012



v06: View east from PROW St Stephen 043 at junction with Noke Lane



Figure 10: Representative Views v04 to v06.

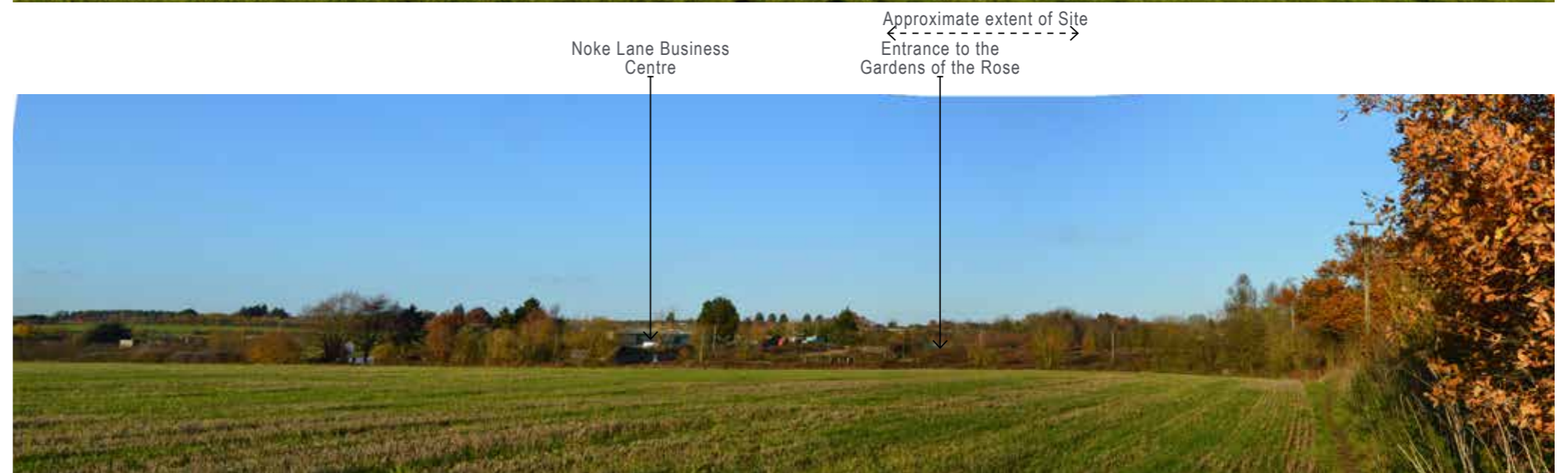
Date: 29.11.2019



v07: View south-east from point east of crossing of PROW St Stephen 043/St Stephen 028, viewed towards Miriam Lane



v08: View south-east from PRoW St Stephen 028



v09: View north from Noke Lane, close to the A405

Figure 10: Representative Views v07 to v09.  
Date: 29.11.2019

## 5. GREEN BELT ASSESSMENT

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### 5.1 Defining Green Belt Purposes in Relation to the Site

5.1.1 Paragraph 134 of the National Planning Policy Framework sets out the five purposes of Green Belt. This section looks at each of them to consider how they apply to the Site.

#### **Purpose 1: to check the unrestricted sprawl of large built-up areas**

5.1.2 The Green Belt Review Purposes Assessment Final Report, which was prepared for Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council in November 2013, categorised London, Luton, Dunstable and Stevenage as the large built-up areas of relevance to this Green Belt purpose for the area of the Review. This Green Belt Review will use this definition and consider the contribution the Site makes in checking the unrestricted sprawl of these four conurbations.

#### **Purpose 2: to prevent neighbouring towns from merging into each other**

5.1.3 The Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council Green Belt Review of 2013 defined 'neighbouring towns' as Primary Settlements (as classified by the relevant local planning authorities). For this study, the relevant Primary Settlements are St Albans, Watford, Hatfield, Harpenden, London Colney and Hemel Hempstead.

5.1.4 When looking at the potential impact of a development on Green Belt Purpose 2 there is a need to look at visibility. For example, if there is a hill between a potential development site and a settlement which prevents inter-visibility between them, the impact on Green Belt purposes is less than it would be if the land were flat and the site could clearly be seen, even if it was two or three miles away.

#### **Purpose 3: to assist in the safeguarding of the countryside from encroachment**

5.1.5 When assessing the contribution that a site makes to this Green Belt Purpose, the degree to which both the Site and its surroundings have the characteristics of open countryside needs to be considered. The primary characteristic to be considered is the absence of built development and dominant urban influences. The impact on this purpose of development on a site that at present has such countryside land uses as agriculture, forestry, green recreation and wildlife conservation will be greater than one which is more urban in character. The same is true of the context of the site – a housing development in an area with a strong countryside character will be a greater encroachment into the countryside than one in an area with urbanising features such as industrial or storage units. The landscape character of the Site and surrounding area therefore needs to be considered. **Section 3.0** provides a thorough overview of the Site's landscape context.

5.1.6 As with Purpose 2, the assessment of the effect of a development on encroachment into the countryside involves a consideration of the visual impact on open countryside. A development which is primarily visually connected to an urban area (though proximity, landform and/or screening) will encroach on the countryside less than one which is more visible from receptors within the open countryside.

5.1.7 Another factor which affects the effect that the development of a site would have on the open countryside is its landscape sensitivity. This can be assessed by assessing the landscape value of the site in terms of the characteristics of open countryside and using the standard methodology of a Landscape and Visual Impact Assessment to assess the site's Landscape Susceptibility (vulnerability to change). These two parameters can be used to reach an assessment of Landscape Sensitivity. The development of a site with a high landscape sensitivity would have a greater impact on the open countryside than one with low sensitivity and would therefore contribute more to this Green Belt Purpose.

5.1.8 A third factor to consider in assessing the degree of encroachment of the open countryside that would be caused by the development of a particular site is the strength, defensibility and permanence of the new Green Belt boundary that would be created. A strong new boundary (such as a topographic feature or railway line) would act as a defence against further encroachment during and beyond the duration of the Local Plan whereas a weak new boundary (such as a fence or hedge) would make it more likely that further encroachment will take place.

#### **Purpose 4: to preserve the setting and special character of historic towns**

5.1.9 St Albans is considered to be a historic town, however it lies at some distance from the site and the site is not considered to contribute to the setting of the town. For the purposes of this assessment relationships to Conservation Areas have also been considered. There are no Conservation Areas within close proximity to the Site, with the Potters Crouch Conservation Area approximately 1.7km to the north-west and the Park Street Conservation Area approximately 1.5km to the east. The impact of potential development on the setting of these Conservation Areas is further considered in **Section 5.2**.

#### **Purpose 5: to assist in urban regeneration**

5.1.10 All Green Belt land is considered to contribute equally to fulfilling this purpose. It has therefore been excluded from this assessment.

#### **Local Green Belt Purpose: to maintain the existing settlement pattern**

5.1.11 The District of St Albans has defined an additional Green Belt purpose in relation to maintaining the exiting settlement pattern and the individual identity of settlements. As highlighted within the Green Belt Purposes Assessment, this purpose can be assessed in the same way as the 2nd purpose, but is instead applied to spaces and gaps '*between the tiers of settlement below the 1st tier*'. As this is not one of the nationally defined Green Belt Purposes this purpose can only be given limited weight.

## 5.2 Assessment of Site against Green Belt Purposes

5.2.1 An independent assessment has been carried out in order to assess the contribution that the Site makes to the five purposes of Green Belt as defined in the NPPF. In addition, an assessment has been made of the contribution that the Site makes to the local Green Belt purpose. The results of the foregoing assessment of the landscape character and sensitivity of the Site and its setting and the visual connections between the site and receptors in the open countryside and the margins of settlements in the study area can be used to assess the contribution made by the Site to Green Belt Purposes.

#### **Purpose 1: to check the unrestricted sprawl of large built-up areas**

5.2.2 Purpose 1 has been defined as relating to the effect that development of the Site would have on London, Luton, Dunstable or Stevenage. There would be no effect on these conurbations due to the distance the Site is from these large built up areas. It is therefore concluded that the Site does not contribute to this Green Belt purpose i.e. has zero importance.

#### **Purpose 2: to prevent neighbouring towns from merging into each other**

5.2.3 The Planning Advisory Service guidance note 'Planning on the Doorstep: The Big Issues – Green Belt' 2015, makes specific reference to preventing neighbouring towns from merging into one another: '*Purpose: to prevent neighbouring towns from merging into one another. Green Belt is frequently said to maintain the separation of small settlements near to towns, but this is not strictly what the purpose says. This will be different for each case. A 'scale rule' approach should*

## 5. GREEN BELT ASSESSMENT Continued.

*be avoided. The identity of a settlement is not really determined just by the distance to another settlement; the character of the place and of the land in between must be taken into account.* The assessment of the contribution that a site makes to the prevention of the merging of neighbouring towns (and, therefore, the impact that the development of a site would have on the separation of settlements) should therefore consider the landscape elements within the 'strategic gap' between the settlements which affects the inter-visibility between the settlements. If the gap consists of interlinked blocks of woodland, views between settlements are likely to be more screened than they would be if the landscape was one of large arable fields with low hedges. Similarly, the topography of the land will affect inter-visibility across a strategic gap between settlements, with an undulating landform likely to be more effective in screening development than flat terrain.

5.2.4 For the purposes of this assessment 'openness' is considered to refer to the quantum and massing of built form and paved areas (and not any 'sense of openness').

5.2.5 In assessing the Site against Purpose 2, two criteria have been considered:

- The degree of visual encroachment that would be caused by a residential development on the site on the 'green gap' between settlements. This considers the effect that landscape features such as woodland blocks and landform would have on the visual obtrusiveness a residential development within a strategic gap.
- The degree of visibility of the site from neighbouring settlements, were residential development to take place on it.

5.2.6 Each of the two criteria were rated for the importance that the site had in terms of its contribution to preventing neighbourhood towns from merging into each other. This ranged from 'zero importance' for a site where development would make no difference to this purpose through 'low importance', 'moderate importance', 'important' to 'high importance' for sites where development would make the biggest contribution towards the merging of neighbouring settlements.

5.2.7 For the purposes of this assessment 'neighbouring towns' have been defined as the Primary Settlements of St Albans, Watford, Hatfield, Harpenden, London Colney and Hemel Hempstead. Development of the Site would result in a very minor encroachment into the green gap towards Hemel Hempstead but it would not encroach beyond the existing settlement limit of Chiswell Green. Furthermore, there is already built development within this gap in the form of Butterfly World (see **Figure 11**). The contribution to Purpose 2 of the site in relation to this criterion was judged to be of 'low importance'.

5.2.8 The assessment of the second criterion 'Views between Settlements' concluded that the parcel was one with 'zero importance' in terms of its contribution to preventing views between the primary settlements. Any built development on the Site would be seen in context with the existing built up area of Chiswell Green and the proposed area of Green Belt release to the immediate north of the Site. If there were any long-range views of rooftops, they would be at such a long distance as to be negligible. The contribution to Purpose 2 of the site in relation to this criterion was judged to be of 'zero importance'.

5.2.9 As one of the categories assessed for Purpose 2 resulted in a categorisation of 'zero importance' and the other of 'low importance' it is judged that the overall contribution that is made by the site to the Green Belt purpose of preventing neighbourhood towns from merging into each other is one of 'low importance'.

### **Purpose 3: to assist in the safeguarding of the countryside from encroachment**

5.2.10 The assessment of the contribution of a site in safeguarding the countryside from encroachment involves the consideration of the nature of the setting of the Site and the sensitivity of the Site to landscape change. A third factor also needs to be considered – the strength and permanence of the Green Belt boundary that would be created if development were to take place. A strong and defensible boundary is more likely to succeed in safeguarding against further encroachment into the Green Belt during the duration of the Local Development Plan and beyond.

5.2.11 Three criteria were considered in order to assess the overall contribution of the site to Green Belt Purpose 3:

- The permanence of the Green Belt boundary that would result following development of the site. This considers the degree to which the boundary that would be created would be 'defensible' against pressures for further development. Physical features would form the strongest, most defensible new boundaries. The least defensible would be potentially ephemeral features such as hedges, fences and land ownership boundaries. Preventing development on a site without a defensible boundary would have a high importance in assessing against Purpose 3, while one with a boundary that would make further encroachment difficult, such as a railway line or large river, would have a low or zero importance.
- The open countryside character of the setting of the site and its degree of representativeness of countryside character. The assessment of this criteria involves a consideration of the landscape context of the site. Does it show the characteristics of open countryside? A site where the landscape context had all the elements of open countryside would be categorised as 'unspoilt open rural character and be rated as having 'High Importance' in contributing towards this Green Belt purpose. If the site had urban elements it would be rated as having less importance in terms of safeguarding the countryside from encroachment.
- The sensitivity of the site to accommodate development without a major adverse effect on the countryside character of the landscape. This is assessed by considering the key relevant landscape receptors that relate to the site itself (i.e. its countryside character, the 'naturalness' of its land cover and its tranquillity) and assessing them in terms of their value. A matrix is used to convert these assessments for value and susceptibility (ranging from 'major' to 'negligible') into a single rating for landscape sensitivity. A site with a low landscape sensitivity could be developed with less adverse visual impact on the open countryside than one with a higher sensitivity. A high sensitivity site would therefore have a high importance in contributing to the safeguarding of the countryside from encroachment as to develop it would have a major impact on the open character of the countryside.

5.2.12 **Table 1** shows the results of the assessment of the three criteria used to assess the impact that the development of the site would have on the safeguarding of the countryside from encroachment (Green Belt Purpose 3).

5.2.13 Following development the site boundaries would be considered moderately defensible. Existing development to the east, and the private road (Miriam's Lane) to the west restrict encroachment into the wider landscape. The Site's regular field pattern is closely related to the existing settlement edge and is not a finger of 'sprawl' extending out into the countryside. Furthermore, the area to the direct north of the Site is considered to be potentially suitable for Green Belt release and the indicative layout for this area shown in Figure 7 incorporates significant Green Infrastructure as to prevent further sprawl.

5.2.14 There is a limited visual connection between the Site and the wider landscape due to existing boundary vegetation and local topography (see **Figure 10 - Representative Views**). The Site is strongly related to the existing settlement edge of Chiswell Green, with the current site access point within this residential area.

5.2.15 The methodology used for assessing landscape sensitivity as part of a Landscape and Visual Impact Assessment; (as described in the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment 3rd Edition) involves assessing the landscape value and susceptibility for a number of relevant elements and factors on a scale of the importance of the effect. A matrix is then used to convert these two ratings into a single rating for landscape sensitivity. This methodology was adapted for this Green Belt Study.

5.2.16 The initial stage was to assess the site's landscape value against a set of criteria based on the characteristics that contribute to open countryside character; the degree of naturalness or urban-ness of the land cover, the degree to which land use is typical of countryside or urban areas and the degree of tranquillity. The site was rated as one of five possible categories for landscape value in relation to open countryside character; very high, high, moderate, low or zero.

## 5. GREEN BELT ASSESSMENT Continued.

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- 5.2.17 The landscape value of the site was found to be 'low'. The Site is much more heavily related to the existing settlement edge to the east than the wider countryside to the west, which exhibits a different character with a large field pattern and greater sense of scale. The more rural, open countryside to the west would be unaffected by development within the Site, and therefore development on the Site would have a negligible contribution to encroachment on the countryside.
- 5.2.18 The land use of the Site is currently paddock land and is grazed by horses, such land use is very common in the locality. The key feature of landscape value within the Site is an existing oak tree which could be retained and incorporated into any proposed development.
- 5.2.19 The next stage in the assessment is to consider the landscape susceptibility of the site. This is the degree of vulnerability to change of the landscape. Following the methodology of the Guidelines for Landscape and Visual Impact Assessment 3rd Edition, the following three criteria were assessed:
- Capacity for accommodating development without affecting the baseline (e.g. will there be a visual effect on key receptors?)
  - The potential for mitigation (e.g. screen planting)
  - The potential for the substitution, replacement or re-creation of features (e.g. the replanting of a lost hedge)
- 5.2.20 These were assessed according to whether the level of opportunity offered by the site was very good, good, some opportunities, low or very low.
- 5.2.21 As with the assessment of a single rating for landscape value, the average ratings for the three categories assessed for landscape susceptibility was used as the level for this category. The overall susceptibility level of the Site was considered to be medium, due to its good potential for mitigation, good potential for substitution, replacement or restoration of features and some capacity for accommodating development without affecting the baseline.
- 5.2.22 The third and final step for assessing landscape sensitivity involves the use of a matrix to convert the ratings for landscape value and susceptibility (assessed on the five-point scale) into a single rating for sensitivity using same the five-point scale as has been used in the assessment of the other Purposes (see Appendix A). A low landscape value and a low to medium landscape susceptibility combine to give a low landscape sensitivity.
- 5.2.23 Overall the Site is considered to make a low contribution to this purpose.

### **Purpose 4: to preserve the setting and special character of historic towns**

- 5.2.24 The Site is not considered to form part of the landscape setting of a historic urban area. There is no intervisibility between the Site and the Potters Crouch Conservation Area, which is separated by layers of field boundary vegetation. The Site is separated from the Park Street Conservation Area by a significant amount of more recent housing. The Site is therefore is not considered to form the setting of the Conservation Area. Development of the Site would therefore have no effect on the settings of the Conservation Areas and does not contribute to preserving the setting and special character of a historic town.

### **Purpose 5: to assist in urban regeneration**

- 5.2.25 All Green Belt land is considered to contribute equally to fulfilling this purpose. It has therefore been excluded from this

assessment.

### **Local Green Belt Purpose: to maintain the existing settlement pattern**

- 5.2.26 As highlighted within the Green Belt Sites Review and Boundary Study, sub-parcel S8 'makes a limited or no contribution towards maintaining the existing settlement pattern' as it is immediately adjacent to the existing built up area. The key settlements to consider in this instance as Chiswell Green and St Albans, however the Site lies to the west of Chiswell Green, away from St Albans to the north. Development of the Site would not extend the western settlement edge of Chiswell Green any further than the existing settlement edge to the north of Chiswell Green Lane. The Site therefore makes zero contribution to this purpose.

Table 1: Contribution of Site to Green Belt Purposes

Assessment of Sensitivity

Value	Susceptibility	Sensitivity	Description
Low	Low to Medium	Low	The Site's landscape value in relation to open countryside characteristics is low and is strongly influenced by the existing settlement edge and local 'horsiculture' land use. The susceptibility to change is considered to be Low to Medium, existing boundary vegetation provides a mature landscape framework.

Assessment of Green Belt Purposes

Purpose 1: to check the unrestricted sprawl of large built up areas					
Relative contribution to Green Belt purposes					
Zero Importance	Low Importance	Moderate Importance	Important	High Importance	
Comments: The Parcel is located away from built up areas of London, Luton, Dunstable and Stevenage.					

Purpose 2: to prevent neighbouring towns merging into one another (Primary Settlements)					
Criteria	Zero Importance	Low Importance	Moderate Importance	Important	High Importance
Effect on the visual 'green gap'	No encroachment	Some/little encroachment	Moderate encroachment	Large-scale encroachment	Significant encroachment
Views between settlements	Neighbouring settlements not visible	Glimpsed views from neighbouring settlements	Views from neighbouring settlements partly obscured	Fairly clear views from neighbouring settlements	Clear views from neighbouring settlements
Relative contribution to Green Belt purposes					
Zero Importance		Low Importance	Moderate Importance	Important	High Importance
Comments: Development of the parcel would result in very little physical and/or visual encroachment between the Primary Settlements of St Albans, Watford, Hatfield, Harpenden, London Colney and Hemel Hempstead					

Purpose 3: to assist in safeguarding the countryside from encroachment					
Criteria	Zero Importance	Low Importance	Moderate Importance	Important	High Importance
Permanence of green belt boundaries following development	Definitive	Strong defensible	Moderate defensible	Weak defensible	No defensible boundary
Character	Significant built form within and/or around the site	Strong urban character, not perceived as open countryside	Notable urban context,	Strong/largely rural character	Unspoilt open, rural character
Sensitivity	Low	Low to Medium	Medium	Medium to High	High
Relative contribution to Green Belt purposes					
Zero Importance		Low Importance	Moderate Importance	Important	High Importance
Comments: The urban edge of Chiswell Green is a strong urbanising influence. The overall sensitivity of this parcel is Medium to High.					

Purpose 4: to preserve the setting and special character of historic towns					
Relative contribution to Green Belt purposes					
Zero Importance	Low Importance	Moderate Importance	Important	High Importance	
Comments: The Parcel is not considered to form part of the landscape setting of a historic town.					

Local Purpose: to preserve the existing settlement pattern					
Relative contribution to Green Belt purposes					
Zero Importance	Low Importance	Moderate Importance	Important	High Importance	
Comments: The Site lies immediately adjacent to the existing settlement edge of Chiswell Green. Development of the Site would; not extend the settlement edge any further west than existing.					



**KEY**

- Site Boundary
- Proposed Area of Green Belt Release (Sites and Boundary Study)
- Landscape Analysis**
- Significant Vegetation
- Prominent Urban Edge
- Areas of non-countryside use within the Green Belt
- Visual Analysis**
- Private Residential Views
- Glimpsed Views



**Figure 11: Green Belt Analysis.**  
 NTS @A3  
 Source: Open Layers/Bing Maps



**KEY**

 Proposed Area of Green Belt Release



**Figure 12: Proposed Area of Green Belt Release.**  
NTS @A3  
Source: Open Layers/Bing Maps



## 6. FURTHER CONSIDERATIONS

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### 6.1 General

- 6.1.1 As no one purpose of the Green Belt has priority over another, the overall assessment level should be the first consideration when assessing which sites are suitable for release from Green Belt. The individual ranking and assessment against each purpose should then be considered. Given the projected housing needs in St Albans District there is a need to consider not just the release of Green Belt land, but also Green Belt land which scores moderately or above in a single category.
- 6.1.2 The Green Belt Review Purposes Assessment prepared for Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council was carried out in 2013 and therefore needs updating in line with the new housing targets and growth projections for the district. The strategic level of assessment also means that the results in terms of harm to the Green Belt are debatable when applied to smaller, individual potential development sites.
- 6.1.3 This report provides a much finer grain assessment than that set out in the Phase 1 Green Belt Purposes Review Assessment in order to determine harm at a much more local level. When overall housing allocations are being made, assessment of the cumulative impact of development in relation to impacts on the Green Belt should be made, as this is beyond the scope of this study.

### 6.2 Landscape and Visual Matters

- 6.2.1 As highlighted within **Section 2.0**, the Site lies within sub-area S8, as identified in the 'St Albans Green Belt Review: Sites and Boundaries Study', which is less sensitive to landscape and visual effects than land further to the west, and as a result, is the most appropriate land for potential release from Green Belt for residential led development.
- 6.2.2 Whilst the Site is not considered to potential release within the report, significant changes to the landscape baseline of the Site mean that the Site is considered to be an appropriate location for development for the following reasons:
- Site Context and Land Use
- 6.2.3 The Site lies immediately adjacent to the existing settlement edge of Chiswell Green, with the character of the Site influenced by existing residential development;
- 6.2.4 Existing vegetation along the southern and western boundaries provides a strong landscape framework. The lack of existing vegetation along the northern site boundary means that the Site is a logical extension to the proposed area for release to the immediate north;
- 6.2.5 Whilst the indicative layout for land at Chiswell Green indicates that the Site comprises woodland this is no longer the case. The Site now comprises paddock land which is currently grazed by horses as well as a number of sheds that house free-roam geese;
- 6.2.6 The location of the Site adjacent to the existing settlement edge lends itself to infill development of a suitable scale and height. This is further supported by the 'St Albans Green Belt Review: Sites and Boundaries Study' which states. " the most appropriate land for potential release from Green Belt for residential led development is the eastern part of the sub-area'. Development of the Site would not extend the western settlement edge of Chiswell Green any further west than existing development to the north of Chiswell Green Lane; and
- 6.2.7 There are no landscape designations covering the Site.

#### Vegetation

- 6.2.8 Existing vegetation encloses the Site and limits views to the wider landscape, creating a strong sense of enclosure. Existing vegetation would form the basis of a landscape mitigation plan which would enhance green infrastructure by reinforcing existing vegetation and locally enhancing the level of tree cover.

#### Landform

- 6.2.9 The Site is located at a lower elevation than land to the west; with existing residential development to the east at a similar or higher elevation. This topographical context, in conjunction with local vegetation cover helps to limit visibility of the Site from the surrounding area, and would allow for development, of an appropriate height, scale and massing, to be accommodated within the Site with minimal visual impact.

## 7. CONCLUSION

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- 7.2.1 This Green Belt Statement has been prepared by James Blake Associates on behalf of DLA Town Planning Ltd. to assess the contribution that land to the west of Noke Side makes to the five nationally defined purposes of Green Belt.
- 7.2.2 This document and supporting photographs provides a detailed assessment of the Site and its contribution to the purposes of the Green Belt set out in the National Planning Policy Framework (NPPF). Consideration has also been given to the Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council Green Belt Review Purposes Assessment and the St Albans Green Belt Review: Sites and Boundary Study.
- 7.2.3 Overall, this assessment is generally in accordance with the findings of the Green Belt Review Purposes Assessment and the Sites and Boundary Study. The Site is considered to make zero contribution to Green Belt Purposes 1 and 4 (to check the unrestricted sprawl of large built up areas and to preserve the setting and special character of historic towns), a low contribution to Green Belt Purpose 2 (to prevent neighbouring towns from merging into each other) and Green Belt Purpose 3 (to assist in the safeguarding of the countryside from encroachment). The Local Green Belt Purpose (to maintain the existing settlement pattern) has been considered as part of this assessment, but as is it not one of the nationally defined Green Belt Purposes and can therefore using professional judgement can only be given limited weight. The Site is considered to make zero contribution to this purpose.
- 7.2.4 The Site relates much more strongly to the existing settlement at Chiswell Green than the open countryside to the west. The Site is screened in most views from the open countryside to west and north-west by field boundary vegetation surrounding the Site and within the wider landscape. To its immediate east of the Site lies existing residential development and in close proximity to the west is the A1(M). Further to the north-west lies Butterfly World. These features already form urbanising influences on the Green Belt.
- 7.2.5 Given the housing delivery need within St Albans District, there is therefore a clear rationale for considering the contribution to the purposes of the Green Belt made by individual sites of this scale as well as the much larger land parcels assessed in the Green Belt Review Purposes Assessment.
- 7.2.6 It is considered that the Site is a suitable location for development, and for release from Green Belt, having a high capacity to accommodate to change. Residential development would be physically and visually connected to the existing western edge of Chiswell Green, new tree planting throughout any proposed development would help integrate the built structures within the local landscape character. Through good design development of the Site would be able to provide Green Infrastructure benefits in accordance with NPPF Paragraph 141 which states that local planning authorities should '*plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land*'.
- 7.2.7 Release of the Site would have no effect on the ability of the remaining Green Belt land to perform the purposes and functions of the Green Belt, and the Site would form a logical extension to the land already considered suitable for Green Belt release to the immediate north.



## APPENDIX A: CRITERIA FOR ASSESSING SENSITIVITY

# APPENDIX A: Criteria for Assessing Sensitivity

**Table A1: Landscape Value and Susceptibility**

Level	Value	Susceptibility
<b>High</b>	<p>Landscape elements that are in good to excellent condition and are a fundamental component of landscape character. Alternatively a distinctive or rare landscape.</p> <p>No urbanising influences, the landscape has an unspoilt open/rural character. Highly tranquil.</p> <p>Existing land use is considered an appropriate land use with regard to Green Belt policy and which contributes strongly to the functional countryside.</p> <p>Landscapes that are in good condition, with a high prevalence of important landscape elements giving rise to a strong or unique character and sense of place.</p>	<ul style="list-style-type: none"> <li>• Very low potential for mitigation.</li> <li>• No potential for substitution or replacement.</li> <li>• No capacity to accommodate the proposed development or change without affecting the baseline situation.</li> </ul>
<b>Medium to High</b>	<p>Landscape elements that are in good condition and make a contribution to defining landscape character.</p> <p>Very few urbanising influences, the landscape generally has an open/rural character. Medium to High tranquillity.</p> <p>Existing land use is generally considered an appropriate land use with regard to Green Belt policy and which contributes strongly to the functional countryside.</p> <p>Landscapes that are in good condition with some important landscape elements giving rise to a positive character and recognisable sense of place, although some detracting features may be present.</p>	<ul style="list-style-type: none"> <li>• Low potential for mitigation.</li> <li>• Very limited potential for substitution or replacement.</li> <li>• Limited capacity to accommodate the proposed development or change without affecting the baseline situation.</li> </ul>
<b>Medium</b>	<p>Landscape elements that are in average condition and make a contribution to defining landscape character. Elements may be protected by local planning policy.</p> <p>Some urbanising features, the landscape is generally considered to be equal parts urban and rural. Medium tranquillity.</p> <p>Site contains some appropriate land uses but also some inappropriate elements, land use or development, countryside functions are provided alongside other landuses.</p> <p>Landscapes that are in average condition with some important landscape elements giving rise to a positive character and recognisable sense of place, although some detracting features may be present.</p>	<ul style="list-style-type: none"> <li>• Some potential for mitigation.</li> <li>• Some potential for substitution or replacement.</li> <li>• Some capacity to accommodate the proposed development or change without affecting the baseline situation.</li> </ul>

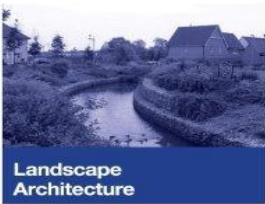
<b>Low to Medium</b>	<p>Landscape elements that are in average condition. They may make a limited contribution to the character of the area or their contribution is reduced by their condition.</p> <p>Many urbanising features present which detract from the landscape character of the area. Low to Medium tranquillity.</p> <p>Sites where the majority of the existing land use is considered an inappropriate land use with regard to Green Belt policy and which do not contribute to the functional countryside.</p> <p>Landscapes that are in average condition with evidence of erosion and limited sense of place.</p>	<ul style="list-style-type: none"> <li>• Good or significant opportunities for mitigation.</li> <li>• Good potential for substitution or replacement.</li> <li>• Capacity to accommodate the proposed development / change without affecting the baseline situation.</li> </ul>
<b>Low</b>	<p>Landscape elements that are in poor condition. They may make a limited contribution to the character of the area or their contribution is reduced by their condition.</p> <p>An almost completely urban landscape with many features or elements that are uncharacteristic and detract from the landscape character of the area. Low tranquillity or not at all tranquil.</p> <p>Sites where the existing land use is considered an inappropriate land use with regard to Green Belt policy and which do not contribute to the functional countryside.</p> <p>Landscapes that are in poor condition with evidence of erosion and limited sense of place.</p>	<ul style="list-style-type: none"> <li>• Very good or significant opportunities for mitigation.</li> <li>• Very good potential for substitution or replacement.</li> <li>• Capacity to accommodate the proposed development / change without affecting the baseline situation, or with potential to enhance it.</li> </ul>

**Table A2: Sensitivity**

		VALUE				
		HIGH	MEDIUM TO HIGH	MEDIUM	LOW TO MEDIUM	LOW
SUSCEPTIBILITY	HIGH	High	High	Medium to High	Medium to High	Medium
	MEDIUM TO HIGH	High	Medium to High	Medium to High	Medium	Low to Medium
	MEDIUM	Medium to High	Medium to High	Medium	Low to Medium	Low to Medium
	LOW TO MEDIUM	Medium to High	Medium	Low to Medium	Low to Medium	Low
	LOW	Medium	Low to Medium	Low to Medium	Low	Low

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& Habitat Management



Land Adoption  
& Weed Eradication

James Blake Associates Ltd

# Preliminary Ecological Appraisal

of

Land at Noke Side,

Chiswell Green,

St Albans

on behalf of

**DLA Town Planning Ltd.**

**November 2019**

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Over 30 Years of Service, Value and Innovation

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		SR	AC	JBA	November 2019
<b>Job Number:</b>  JBA 19/325		 <p><b>JAMES BLAKE</b> A S S O C I A T E S</p> <p><b>Title:</b> Preliminary Ecological Appraisal of Land at Noke Side, Chiswell Green, St Albans</p>			

#### **Disclaimer**

*James Blake Associates Ltd have made every effort to meet the client's brief. However, no survey ensures complete and absolute assessment of the changeable natural environment. The findings in this report were based on evidence from thorough survey: It is important to remember that evidence can be limited, hard to detect or concealed by site use and disturbance. When it is stated that no evidence was found or was evident at that point in time, it does not mean that species are not present or could not be present at a later date: The survey was required because habitats are suitable for a given protected species, and such species could colonise areas following completion of the survey.*

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## Non-technical Summary

<b>Site:</b>	Land at Noke Side, Chiswell Green, St Albans
Ordnance Survey National Grid Reference:	TL 13037 03982
Report Commissioned by:	DLA Town Planning Ltd.
Date of Walkover Survey:	21 <sup>st</sup> November 2019

Considerations	Description	Potential impacts and timing
Statutory designated wildlife areas within 7km of the site:	Two Sites of Special Scientific Interest (SSSI). Seven Local Nature Reserves (LNR).	The site is within several IRZ's for SSSI's and will meet the qualifying criteria for consultation between the LPA and NE if the proposals include pipelines, pylons and overhead cables or any transport proposal including road, rail and by water (excluding maintenance).
Non-statutory designated wildlife sites within 2km of the site:	20 Local Wildlife Site (LWS).	-
Results of walkover survey:	The site is considered suitable to support badger, nesting birds, hedgehog, bats, reptiles and great crested newt (GCN). The site is considered to be of 'moderate' habitat value for bats.	-
Phase 2 surveys:	Badger survey.	Six months prior to development works. Optimal period for badger survey is between February to April or in September.
Phase 2 surveys dependent on development layout:	Bat emergence survey.	A single emergence and a single re-entry survey for 'moderate' bat roost potential tree (visits can be undertaken from May to August).
	Bat activity survey.	If boundary vegetation cannot be retained; one survey visit per month between April to October

Considerations	Description	Potential impacts and timing
Precautionary measures:	Works or removal of boundary vegetation (trees, scrub) and brash pile.	<p>Outside of the nesting bird season or following a clear nesting bird check. Under the supervision of a GCN licenced ecologist (following Reasonable Avoidance Measures).</p> <p>Scrub should be cut to 20cm using hand-held tools and checked for wildlife.</p> <p><b>Timings and consideration will be needed in relation to nesting birds and GCN.</b></p>
	Removal of brash piles.	Should be dismantled by hand and at appropriate time of year.
	Maintain short grassland sward height.	If grassland is left unmanaged and becomes suitable in the future, further reptile surveys will be required.
	Deadwood.	Deadwood should remain in situ. If this is not possible then the deadwood should be carefully moved to a suitable area nearby.

## 1 Introduction

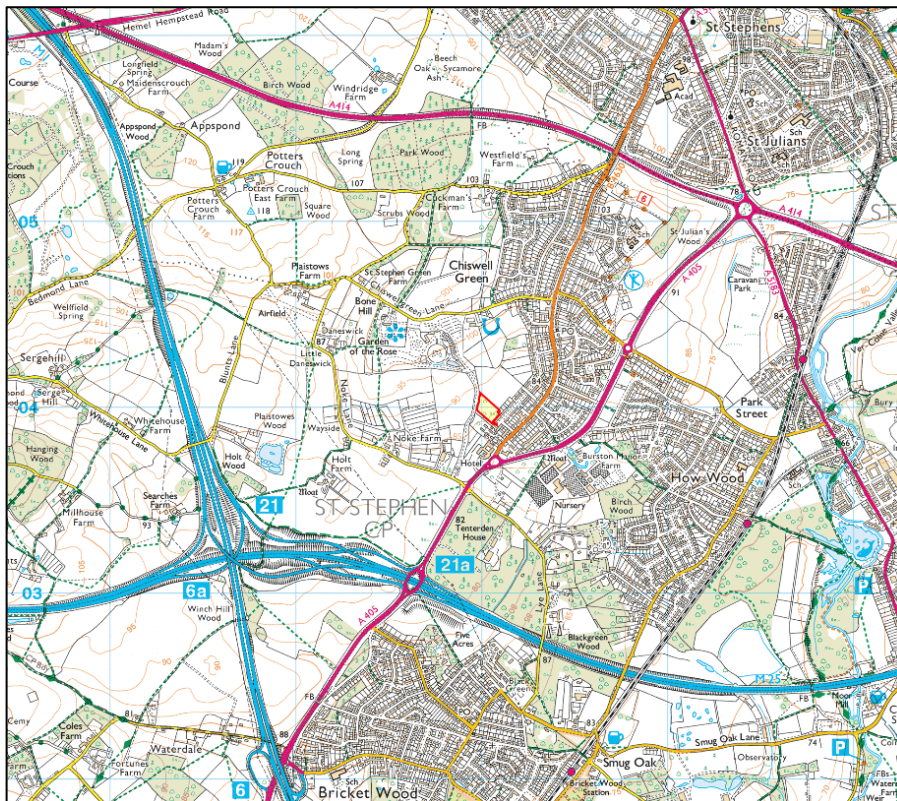
### Background

- 1.1 James Blake Associates Ltd. was commissioned by DLA Town Planning Limited to undertake a Preliminary Ecological Appraisal (PEA) of land at Noke Side, Chiswell Green, St Albans (Ordnance Survey National Grid Reference TL 13037 03982, taken from the centre of site).
- 1.2 The assessment was required to accompany a planning application for residential buildings and associated infrastructure.

### Site Description

- 1.3 The site is approximately 1.1 hectares in size and accessed via Noke Side. The site is located in the village of Chiswell Green, to the east of Miriam Lane and west of Watford Road off the A405. The wider landscape includes mainly arable fields and pastures with scattered woodland. The River Ver is approximately 1.7km east of the site with a series of lakes and watercourses (see Figure 1 below).

**Figure 1: Site location**



Reproduced from Magic maps data licence number 100059700.

## **Aims and objectives**

1.4 The aim of the survey was to:

- Identify the presence, or potential presence, of any protected or notable species or habitats on, or adjacent to, the site;
- make recommendations for further surveys if required, to advise on avoidance and/or mitigation measures following the survey (if necessary) and provide suggestions to enhance the wildlife value of the site post-development to provide a net gain in biodiversity value.

## **Wildlife Legislation and Planning Policy**

1.5 The relevant wildlife legislations and planning policies are listed below:

- Conservation of Habitats and Species Regulations 2017, ['The Habitats Regulations']. The Habitats Regulations implement The Habitats Directive 1992 [92/43/EEC] into English Law. [Amended by the Conservation of Habitats and Species (Amendment) Regulations 2012 S.I. 2012/1927].
- Wildlife and Countryside Act, 1981 (as amended) (WCA). [Amended by the Countryside and Rights of Way Act (2000)].
- The Natural Environment and Rural Communities Act, 2006 (NERC).
- The Protection of Badgers Act, 1992 (The Badgers Act).
- The Wild Mammals (Protection) Act, 1996.
- The Hedgerows Regulations, 2007.
- National Planning Policy Framework, 2019 (NPPF).

## 2 Methodology

### *Desk study*

- 2.1 A desk study was undertaken for statutory and non-statutory designated wildlife sites within a 7km and 2km radius of the site, respectively using 'MAGIC', the Multi-Agency Geographic Information system for the Countryside. The data provided from Hertfordshire Environmental Records Centre (HERC) was consulted for records of non-statutory sites and protected and rare species within a 2km search radius (HERC data provided on the 22<sup>nd</sup> November 2019).
- 2.2 The site is covered by the Local Biodiversity Action Plan (LBAP) for Hertfordshire which was consulted as part of the desk study.
- 2.3 Within the desk study results, the Birds of Conservation Concern (BoCC) are split into three criteria; the red list is the highest conservation priority (species needing urgent action). The amber list is the next most critical group, followed by green. Red listed species are those that are globally threatened according to the International Union for Conservation of Nature (IUCN) criteria, species with populations or ranges that have declined rapidly in recent years, and those that have declined historically and have not shown a substantial recent recovery.
- 2.4 Ponds which are ecologically connected and within 500m of the site, were also identified using 'MAGIC' to determine the location of ponds which may support breeding protected amphibians, such as great crested newts (*Triturus cristatus*) (GCN) (Langton et al., 2001).

### *Walkover Survey*

- 2.5 The survey was undertaken by [REDACTED], (Natural England Bat Class Licence CL17 and Natural England Great Crested Newt Licence CL08) on the 21<sup>st</sup> November 2019.
- 2.6 The survey methodology followed the standard Phase 1 methodology of Joint Nature Conservation Committee Guidelines (JNCC, 2010). An extension of this basic methodology was also undertaken to provide further details in relation to notable or protected habitats present within the survey area, or in relation to habitats present that have the potential to support notable or protected species (CIEEM, 2013).

- 2.7 **Bats:** Trees within the site boundary were surveyed, from the ground, for their potential to support roosting bats in accordance with Bat Conservation Trust's Guidelines (Collins (ed.), 2016).
- 2.8 **Reptiles:** A visual survey for the presence of suitable habitat was carried out according to the criteria given in the Herpetofauna Workers' Manual (Gent and Gibson 1998).
- 2.9 **Amphibians:** Where accessible, known ponds within 500m of the site (unless ecologically separated from the site by significant barriers, such as major roads or rivers) were assessed for potential to support breeding amphibians, such as great crested newts. Ponds were assessed for their potential suitability to support GCN by undertaking a Habitat Suitability Index (HSI) assessment (Oldham *et al.*, 2000). The HSI for GCN is assessed using ten habitat variables (suitability indices – SI) which are known to affect the survival and ability to breed, of GCN. The variables include:
- Geographical location.
  - Pond area.
  - Pond permanence (number of years a pond is likely to dry out per decade).
  - Water quality.
  - Percentage of shade of margin.
  - Number of waterfowl.
  - Occurrence of fish.
  - Pond density.
  - Terrestrial habitat.
  - Macrophyte (plant) cover.

Each variable (or suitability index) is assessed in the field and expressed on a scale from 1 (optimal suitability for GCN) to 0 (totally unsuitable). The ten variables, or indices, are combined using geometric mean to derive the final HSI score for the waterbody. The scoring system is presented in Table 1 below:

**Table 1:** HSI score and suitability of a waterbody habitat to support breeding GCN

HSI Score	Suitability of water body habitat to support breeding GCN
0.01-0.49	'Poor'
0.50-0.59	'Below average'
0.60-0.69	'Average'
0.70-0.79	'Good'
0.80-1.00	'Excellent'

- 2.10 **Invertebrates:** The site was scoped for significant rotting deadwood, and high quality aquatic or other habitats, which could be used by significant assemblages of invertebrates, or by any of the invertebrates highlighted in the data search.
- 2.11 **Flora and habitats:** All habitats and plant species that were identifiable at the time of the survey were recorded.
- 2.12 **Badgers:** A visual survey for setts, hair, latrines, prints, snuffle marks or other signs of badgers was undertaken within the site boundary, following guidelines set out by the Mammal Society (1989).
- 2.13 **Birds:** A visual survey of bird activity and suitable nesting habitat was carried out, to determine if any areas would be suitable for WCA Schedule 1 birds, BoCC or other common and widespread nesting birds.
- 2.14 **Adjacent Habitat:** Habitats close to the site were identified, using aerial maps and field observation, so that the ecological impact of the proposed works on the wider landscape could be assessed.

#### *Limitations and Assumptions*

- 2.15 The baseline conditions reported in this document represent those identified at the time of the survey on 21<sup>st</sup> November, 2019. Although a reasonable assessment of habitats present can be made during a single walkover survey, seasonal variations are not observed. The survey was conducted in November, which is outside the optimal season for the identification of flora, however this is not considered a significant constraint.
- 2.16 The desk study used available records and historical data from the local area. However, this does not provide a reliable indication of species present since records depend entirely on survey effort in the area, which is highly variable. The data are useful as a general guide to supplement the site visit, but absence of records does not reflect absence of species.



### 3 Results

#### Desk Study

##### *Statutory Designated Wildlife Sites*

- 3.1 Two 'Sites of Special Scientific Interest' (SSSI) and seven Local Nature Reserves (LNR) were identified within 7km of the site (Table 2).
- 3.2 The proposed development site is also within the Impact Risk Zones (IRZ) for at least one SSSI. The development does fall under the IRZ criteria that would likely trigger consultation between the Local Planning Authority (LPA) and Natural England for this site if; the proposals include pipelines, pylons and overhead cables. Any transport proposal including road, rail and by water (excluding maintenance).

**Table 2:** Statutory designated wildlife areas within 7km

Site Name	Designation	Distance from Site	Description
Moor Mill Quarry, West	SSSI	1.4km south east	This site is approximately 0.16 hectares and is a geological SSSI.
Bricket Wood Common	SSSI	1.9km south	A large remnant of a formerly extensive lowland heath that developed on heavy, base deficient soils of the boulder clay. The drainage is poor and wet habitats are characteristic of the site with some drier heath developed on areas with gravel capping.
Watercress Wildlife Site	LNR	3.1km north east	It occupies the site of old watercress beds and allotments, bounded by the River Ver. Supports populations of many birds, waterfowl and insects.
Garston Park	LNR	3.3km south	The woodland is dominated by oak ( <i>Quercus sp</i> ), ash ( <i>Fraxinus excelsior</i> ) and sycamore ( <i>Acer pseudoplatanus</i> ). The neutral grassland contains a diverse range of species including ox-eye daisy ( <i>Leucanthemum vulgare</i> ), black knapweed ( <i>Centaurea nigra</i> ), bird's-foot-trefoil and ( <i>Lotus corniculatus</i> ). The wetland areas contain lesser pond sedge ( <i>Carex acutiformis</i> ) and reed canary grass ( <i>Phalaris arundinacea</i> ).

Albans Wood	LNR	3.7km south	This is an ancient semi-natural oak woodland with beech ( <i>Fagus sylvatica</i> ) and some planted horse chestnut ( <i>Aesculus hippocastanum</i> ), sweet chestnut ( <i>Castanea sativa</i> ) and sycamore. There is a hazel ( <i>Corylus avellana</i> ) coppice below and ground cover of mainly bluebell ( <i>Hyacinthoides non-scripta</i> ) and bramble ( <i>Rubus fruticosus</i> agg.).
Harebreaks Wood	LNR	5.3km south west	The site is semi-natural woodland of oak, ash and cherry ( <i>Prunus avium</i> ). Birds include great-spotted woodpecker ( <i>Dendrocopos major</i> ), treecreeper ( <i>Certhia Familiaris</i> ) and nuthatch ( <i>Sitta europaea</i> ).
The Wick Wood	LNR	5.5km north east	Comprises 3.3 ha of woodland with areas of conservation grassland margins. The main habitat of the site is ancient semi-natural woodland dominated by oak and hornbeam ( <i>Carpinus betulus</i> ). There is also a seasonal pond, historic field boundaries of bank and ditch and old hornbeams.
Colney Heath	LNR	6.9km east	One of the few remaining acid heathlands in Hertfordshire, this 60 acre site, bordering the river Colne, provides a haven for wildlife. It is managed to maintain the acid grassland, as well as to retain the diversity of species in and around the grade 1 stretch of river.
Fisher's Field	LNR	7km south	There are areas of woodland, with trees including oak, rowan ( <i>Sorbus aucuparia</i> ) and wild cherry, and a wildflower meadow and scrub with bramble and willow herb ( <i>Epilobium</i> sp).

### *Non-Statutory Designated Wildlife Sites*

- 3.3 There were 20 non-statutory designated wildlife sites identified within 2km of the site; all of which are Local Wildlife Sites (LWS). These are detailed in Table 3.

**Table 3:** Non-statutory designated wildlife sites within 2km of the site

Site Name	Designation	Distance from Site	Description
How Wood	LWS	600m east	Remnant of ancient semi-natural pedunculate oak ( <i>Quercus robur</i> )/hornbeam coppiced woodland. Ash and wild cherry are frequent in the canopy. There is a good shrub layer with frequent hazel coppice and hawthorn ( <i>Crataegus monogyna</i> ). The ground flora is dense with much bramble and ivy ( <i>Hedera helix</i> ) plus bluebell.
Birch Wood	LWS	660m south east	Ancient semi-natural woodland of pedunculate oak standards and hornbeam coppice with wild cherry, silver birch ( <i>Betula pendula</i> ) and ash ( <i>Fraxinus excelsior</i> ). The ground flora contains mostly bramble, bracken ( <i>Pteridium aquilinum</i> ) with woodland indicators including bluebell and wood anemone ( <i>Anemone nemorosa</i> ). Ponds are present.
Park Wood	LWS	1.1km north	Large ancient woodland bisected by a road and almost completely replanted with conifers. The edge of the woodland retains a semi-natural canopy with a more diverse flora below.
Scrubs Wood	LWS	1.1km north west	Ancient semi-natural woodland supporting a high canopy dominated by pedunculate oak.
St Julian's Wood	LWS	1.1km north east	Ancient semi-natural pedunculate oak/hornbeam coppice-with-standards woodland with beech, ash and holly ( <i>Ilex aquifolium</i> ) together with wild cherry, field maple ( <i>Acer campestre</i> ) and occasional sycamore.
Blackgreen Wood	LWS	1.1km south	Ancient semi-natural acidic sessile oak ( <i>Quercus petraea</i> )/hornbeam woodland. pedunculate oak and the hybrid oak ( <i>Q. x rosacea</i> ) are also recorded along with hazel coppice, birch ( <i>Betula spp.</i> ) and holly. A diverse ground flora has been recorded, with Bluebell dominant.
Holt Wood	LWS	1.2km west	Ancient semi-natural pedunculate oak/hornbeam coppiced woodland with some wild cherry and beech standards. Some hazel coppice and holly are present in the shrub layer, mainly below the beech canopy.
Long Spring	LWS	1.3km north west	Thin strip of ancient woodland mostly replanted with Scots pine ( <i>Pinus sylvestris</i> ) and a little beech in the north. A more natural canopy survives around the woodland edge and in an old disused pit in the south.
Moor Mill and Park Street Pits West	LWS	1.4km south east	A substantial area of relatively overgrown grassland with scattered areas of scrubland, on a former gravel

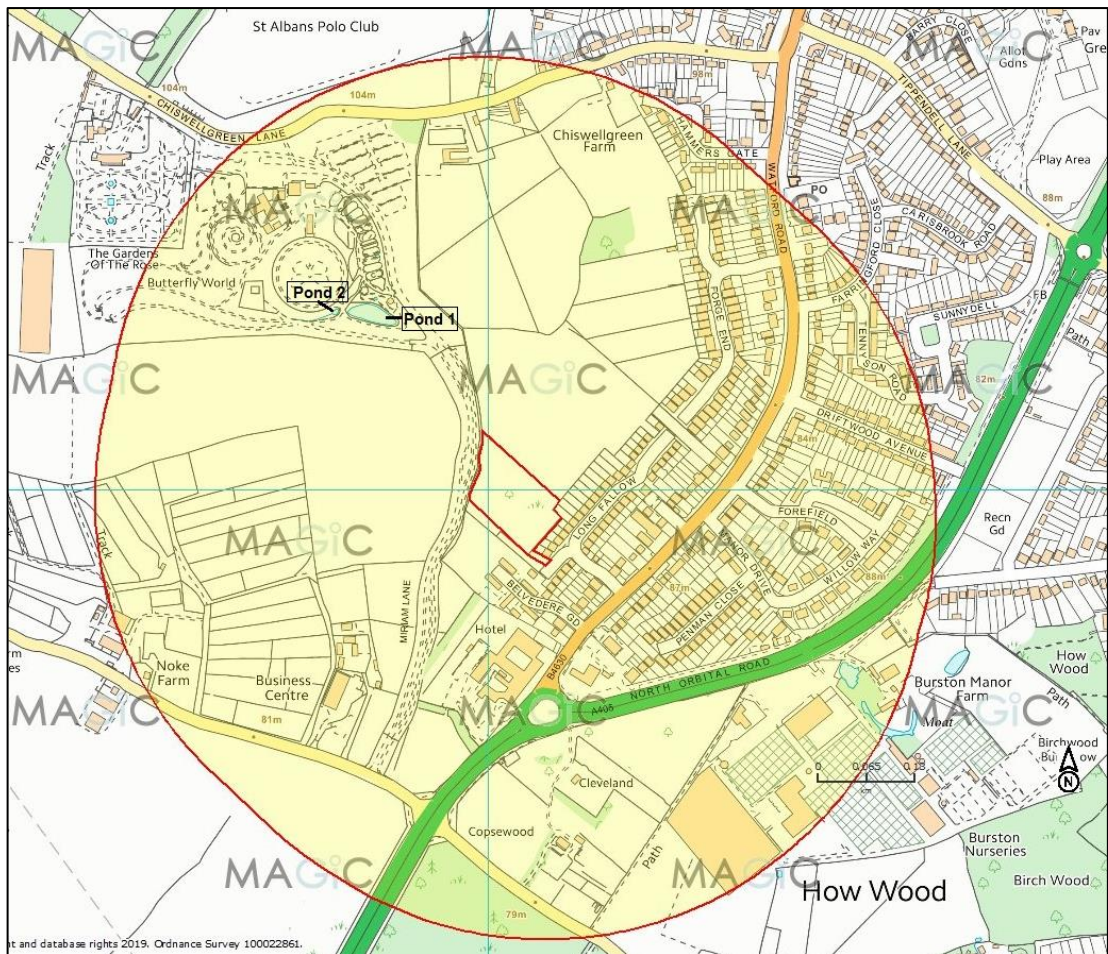
Site Name	Designation	Distance from Site	Description
Grassland			extraction site. The site appears to have had little to no recent management carried out. Substantial areas of the invasive and non-native Goat's Rue ( <i>Galega officinalis</i> ) is present across the site.
Birch Wood	LWS	1.5km north west	Ancient semi-natural woodland bisected by a major road, which has been largely replanted with conifers leaving remnant canopy of broadleaved species around the perimeter, mainly of pedunculate oak, and hazel. Rides and wood bank features add habitat diversity.
Potterscrouch Section	LWS	1.5km north west	Fragment of ancient pedunculate oak/hornbeam coppiced woodland with all pedunculate oak felled. Wild cherry standards are also present. There are areas of scattered to dense scrub consisting mainly of elder ( <i>Sambucus nigra</i> ) and hawthorn with some holly and coppiced hazel.
Winch Hill Wood	LWS	1.5km south west	Ancient pedunculate oak/hornbeam woodland. The woodland consists of old hornbeam coppice with mature pedunculate oak standards, some wild cherry, ash and silver birch. The ground flora supports typical ancient woodland indicators.
Ashdale	LWS	1.6km south	Remnant of ancient semi-natural broadleaved woodland composed of mainly pedunculate oak and ash with some silver birch plus locally frequent hazel coppice. Several broadleaved species have been planted including beech, horse-chestnut and Norway maple ( <i>Acer platanoides</i> ). The scrub layer is dense in places and dominated by elder and hawthorn.
Ver Valley Meadows	LWS	1.7km east	A series of old mainly unimproved meadows along the valley of the River Ver supporting predominantly neutral grassland but with more acid communities on areas of higher ground. The grassland varies from damp to very wet, with marshy grass and rarer swamp/fen vegetation present in lower lying areas.
Frogmore Gravel Pit	LWS	1.7km south east	Former gravel workings supporting a mosaic of habitats including rough grassland, a reach of the River Ver, flooded gravel pit lakes, permanent and temporary pools and dry to wet secondary broadleaved woodland and scrub. The grassland is moderately diverse with a number of uncommon species including grass vetchling ( <i>Lathyrus nissolia</i> ), pyramidal orchid ( <i>Anacamptis pyramidalis</i> ) and bee orchid ( <i>Ophrys apifera</i> ).

Site Name	Designation	Distance from Site	Description
Featherbed Lane Copse by Serge Hill	LWS	1.8km west	Ancient green lane bordered by old laid hedges. The hedge supports some wild cherry standards, field maple coppice with standards and hawthorn, hazel and holly.
Bricket Wood	LWS	1.8km south	Building and environs important for protected species.
Grassland at Former Radlett Aerodrome	LWS	1.9km east	Old secondary, essentially unimproved, neutral to acidic grassland. The best acidic areas occur as a mosaic with coarser more neutral grassland. Acid areas are characterised by common bent ( <i>Agrostis capillaris</i> ) with rarer silver hair-grass ( <i>Aira caryophyllea</i> ) plus creeping Soft-grass ( <i>Holcus mollis</i> ), squirrel-tail fescue ( <i>Vulpia bromoides</i> ) and oval sedge ( <i>Carex leporina</i> ).
Quarry at Former Radlett Aerodrome	LWS	1.9km east	Extensive former gravel quarry supporting re-seeded grassland, lagoons, pools and ponds. The site is particularly important for birds, mainly waterfowl and wetland species.
Moor Mill South	LWS	1.9km south east	Infilled gravel pit with a species diverse flora. The main habitat, rough part damp grassland, is moderately species-rich with several uncommon plants recorded such as grass vetchling, prickly sedge ( <i>Carex muricata</i> ) and bee orchid.

#### *Ponds within 500m*

- 3.4 Two ponds were identified within 500m of the site boundary. Pond 1 located 184m north west of site and Pond 2 248m north west of the site (Figure 2). Three other ponds were also located to the east of the site, however these are considered to be ecologically separated due to the built up residential area and the A405 which acts as a significant barrier.

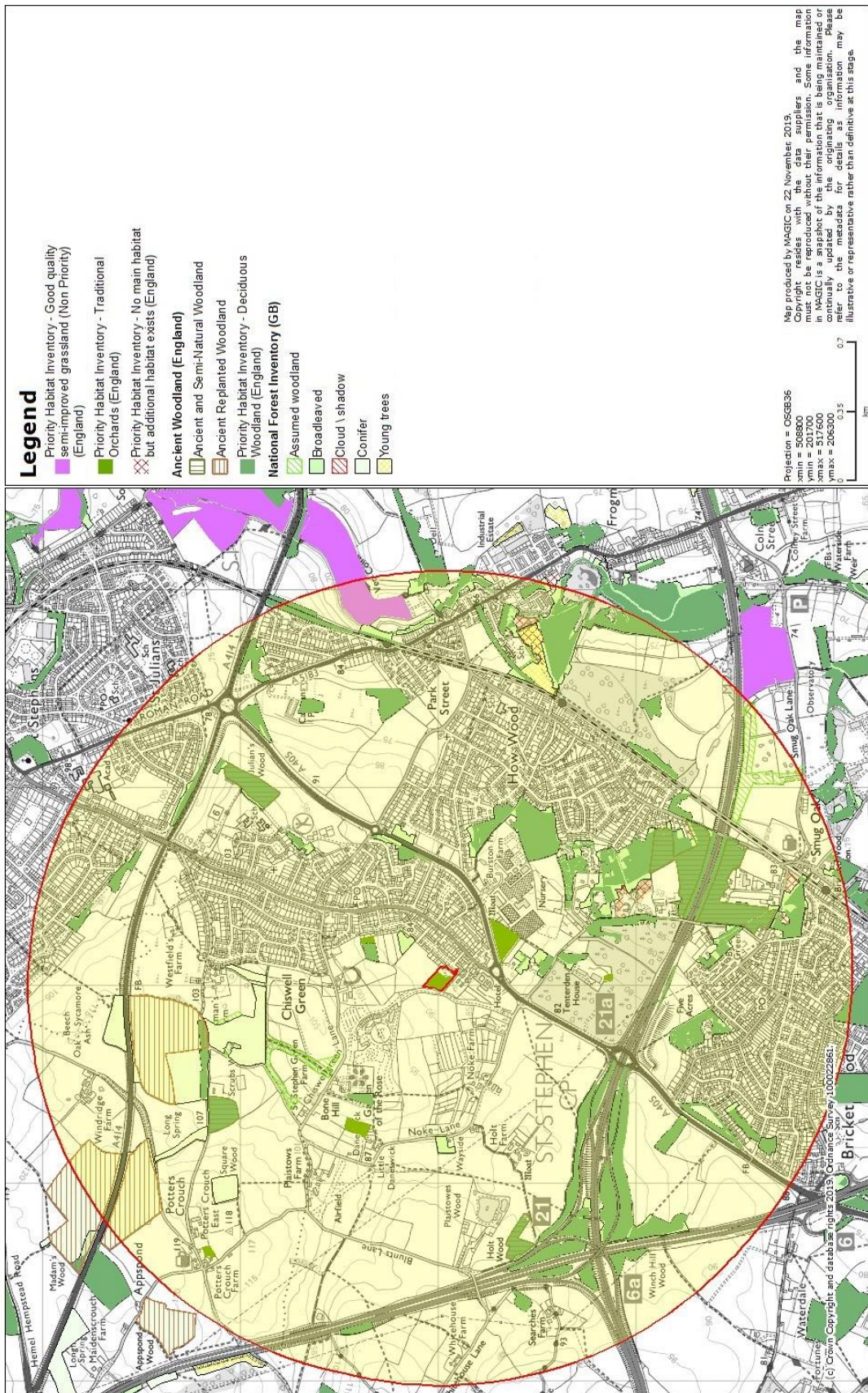
**Figure 2:** Ponds within 500m of the site boundary



*Habitat Types within 2km*

3.5 Habitat types within the area include ancient, ancient replanted and semi-natural woodland, conifer, boardleaved and deciduous woodland, areas of young trees, traditional orchards and good quality, semi-improved grassland. The nearest woodland is 184m north east of the site boundary (Figure 3). The desk study identified the site as traditional orchard habitat, however this was not present at the time of the walkover survey.

**Figure 3: Habitat types within 2km of the site**



### *Protected, priority and rare species*

- 3.6 There were no records of protected or rare species for the site itself, although there were numerous records of species within 2km of the site (full raw data can be provided upon request). The most relevant records are described below. Records over ten years old have not been referred to as the walkover survey is considered to provide a more up to date and accurate account of species and habitats for the site.
- 3.7 Within the desk study soprano pipistrelles (*Pipistrellus pygmaeus*), common pipistrelles (*Pipistrellus pipistrellus*) and noctule bats (*Nyctalus noctula*) were recorded 850m east of the site boundary in 2013. Brown long-eared bats (*Plecotus auritus*) were recorded in 2010, 1km north of the site.
- 3.8 Badger (*Meles meles*) records from 2017 were identified within 2km of the site.
- 3.9 West European hedgehog (*Erinaceus europaeus*) were recorded 1.3km east in 2018.
- 3.10 27 Red listed bird species were identified within 2km of the site, six of which are also Species of Principal Importance (SPI) and UK Biodiversity Action Plan (BAP) species. These included; yellowhammer (*Emberiza citrinella*), wood warbler (*Phylloscopus sibilatrix*), lesser redpoll (*Acanthis cabaret*), lapwing (*Vanellus vanellus*), house sparrow (*Passer domesticus*) and cuckoo (*Cuculus canorus*). Song thrush (*Turdus philomelos*) which is Red listed is also an LBAP species and identified within 2km of the site boundary. Seven Schedule 1 species were identified within the desk study including fieldfare (*Turdus pilaris*) and redwing (*Turdus Iliacus*) which are also Red listed species.
- 3.11 14 Amber listed species were identified within 2km of the site boundary, including; bullfinch (*Pyrrhula pyrrhula*), dunnoek (*Prunella modularis*), meadow pipit (*Anthus pratensis*) and willow warbler (*Phylloscopus trochilus*). The Amber listed species reed bunting (*Emberiza schoeniclus*) was also identified which is a SPI and UK BAP species.
- 3.12 Stag beetle (*Lucanus cervus*) was identified 1km north of the site boundary in 2015. Stag beetles are SPI, UK and Local BAP species.

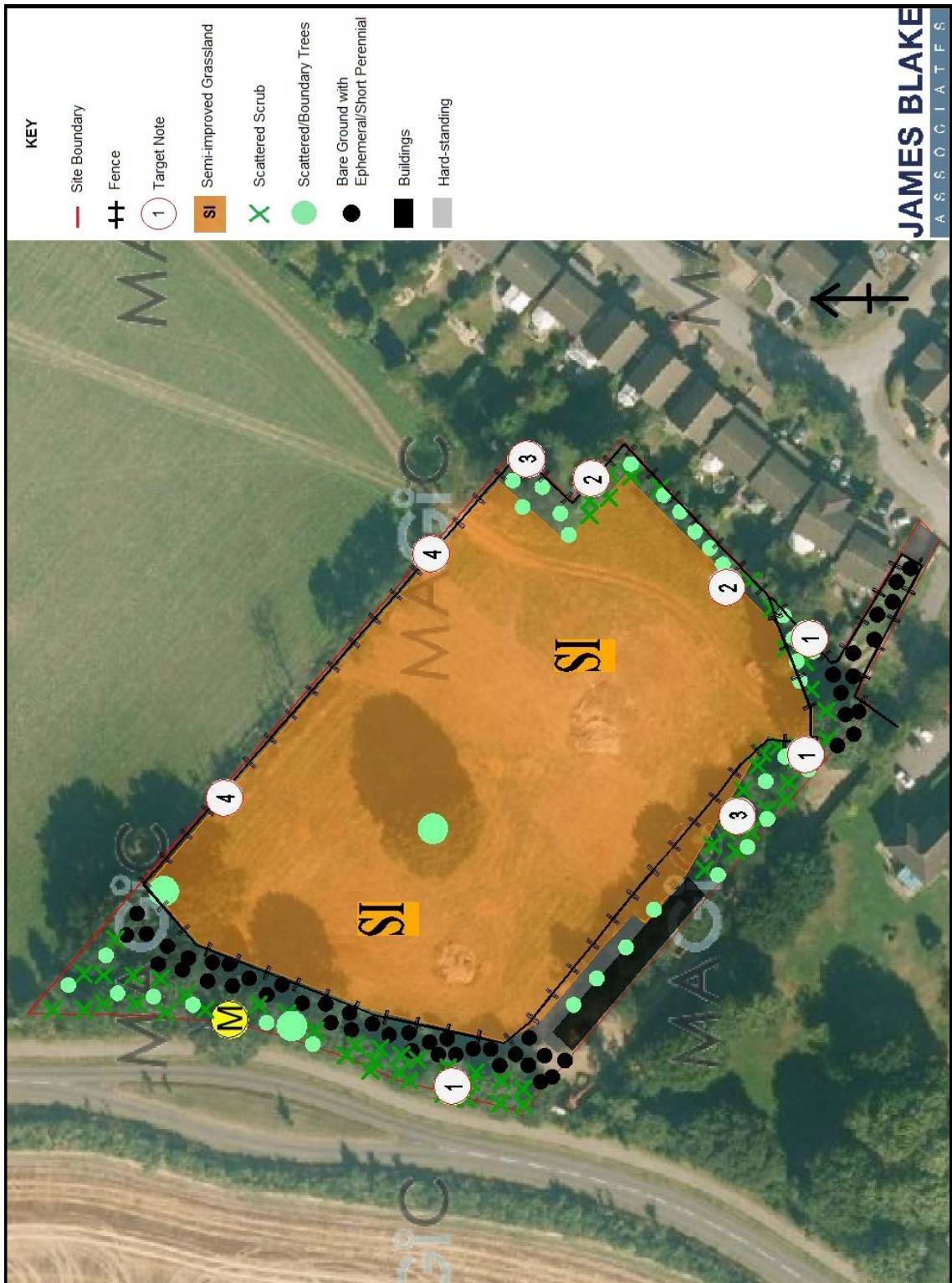


- 3.13 49 moth species were identified within 2km of the site boundary; 40 of which are UK BAP species. Species included; autumnal rustic (*Eugnorisma glareosa*), large nutmeg (*Apamea anceps*) and mouse moth (*Amphipyra tragopoginis*).
- 3.14 Seven butterfly species were identified within 2km of the site from 2010 to 2017; Essex skipper (*Thymelicus lineola*), white admiral (*Limenitis camilla*), white-letter hairstreak (*Satyrrium w-album*), small skipper (*Thymelicus sylvestris*), small heath (*Coenonympha pamphilus*), chalk hill blue (*Polyommatus coridon*) and small blue (*Cupido minimus*). All butterfly species identified are either LBAP, UKBAP or are in decline throughout Hertfordshire.





#### *Walkover Survey*

- 3.15 The habitats on site were considered with respect to their potential to support protected species.
- 3.16 Within the redline boundary the site comprises a number of dominant 'habitat types', taken from those listed in the Handbook for Phase 1 Habitat Survey (JNCC, 2010). These habitat types are described below and are shown schematically on Figure 4. Target Notes (TN) are presented in Table 4. A list of plant species identified on site is included in Appendix A. The baseline conditions reported and assessed in this document represent those identified at the time of the survey on 21<sup>st</sup> November, 2019. Although a reasonable assessment of habitats present can be made during a single walkover survey, seasonal variations are not observed.
- 3.17 The majority of the site comprises grazed semi-improved grassland and scattered/boundary trees. Other habitats present on site are bare ground, hardstanding with ephemeral/short perennial, scrub and buildings.
- 3.18 The following photographs in Table 4 show the Target Notes referred to in Figure 4.

Figure 4: Phase 1 Habitat Map



**Table 4:** Target Notes

Target Note	Habitat description	Photo
1	Multiple nests present in boundary vegetation.	
2	Invasive plants; buddleia and snowberry present at southern boundary.	
3	Areas of deadwood present on site.	
4	Large brash pile.	

## 4 Protected Species – Results and Evaluation


### *Badger*

- 4.1 The majority of habitats on the site are considered unsuitable for badgers due to no or minimal cover for sett creation. The semi-improved grassland on site provides limited foraging opportunities due to horse grazing. However, the scrub and the northern boundary of the site have the potential to provide suitable habitat for sett creation.
- 4.2 No setts or evidence of badger activity with regard to hair, latrines or snuffle holes were recorded during the site visit however, badgers can move into an area relatively rapidly, especially if there is pressure on the habitat they are currently using or if foraging opportunities increase.

### *Bats*

- 4.3 The buildings and trees on site were assessed from the ground for bat roosting evidence and potential.
- 4.4 Buildings present on site are all single-story chicken and storage sheds which offer 'negligible' bat roosting potential (BRP). There are no suitable roosting features available within the structures and there are high levels of regular disturbance.
- 4.5 Majority of the trees on site are considered to have 'negligible' BRP due to no suitable features present, such as dense ivy cover, peeling bark and/or knot holes. One oak tree at the northern boundary of the site (Figure 4) is considered to have 'moderate' BRP due to peeling bark and a woodpecker hole present (Table 5).
- 4.6 Habitat on site was assessed as 'moderate' for foraging and commuting bats. There is good connectivity to the wider landscape, particularly woodlands north of the site. Areas of scrub and grazed semi-improved grassland could provide some foraging opportunities.

**Table 5:** Potential bat roosting features

Potential bat roost feature	Photo
M: Mature oak with peeling bark and woodpecker hole.	

### *Hedgehog*

- 4.7 The site provides moderate suitability for hedgehog with the scattered/continuous scrub throughout site and large brash pile on the south eastern boundary providing shelter and the semi-improved grassland providing some foraging opportunities.
- 4.8 No evidence of hedgehog was recorded during the walkover survey.

### *Birds*

- 4.9 Scrub, boundary/scattered trees and brash piles on site provide nesting and foraging opportunities for birds. Several nests were observed within the trees and brash piles at the eastern boundary. Other habitats present on site are considered unsuitable for ground nesting birds due to the small scale nature and limited shelter.
- 4.10 Bird species observed during the walkover survey included; blue tit (*Cyanistes caeruleus*), long-tailed tit (*Aegithalos caedatus*), wood pigeon (*Columba palumbus*), black bird (*Turdus merula*), magpie (*Pica pica*), red kite (*Milvus milvus*), chaffinch (*Fringilla coelebs*) and robin (*Erithacus rubecula*).

### *Reptiles*

- 4.11 The majority of the site is considered unsuitable for reptiles due to the extent of grazed semi-improved grassland and areas of bare ground with ephemeral/short perennial habitat. However, if the grassland is left to grow up then the area will become suitable for reptiles in the future.

- 4.12 The scrub and brash piles surrounding the site provide hibernation and sheltering opportunities.

#### *Amphibians*

- 4.13 Two ponds were identified during the desk study search within 500m of site boundary. However access could not be gained for the ponds and therefore a HSI assessment could not be undertaken.
- 4.14 Currently only boundary vegetation on site, including brash piles, provide good terrestrial habitat for GCN. However, if the grassland is left to grow up then the area will become suitable for GCN in the future.

#### *Invertebrates*

- 4.15 The habitats on the site are unlikely to support a diverse assemblage of invertebrates due to the small scale of habitats present. However, the scrub areas provide potential habitat for invertebrates such as white-letter hairstreak butterflies which were identified in the desk study.
- 4.16 Areas of deadwood are also present on site which provide suitable habitat for stag beetles which were identified in the desk study.

#### *Flora*

- 4.17 No rare or protected plant flora was identified during the walkover survey.
- 4.18 Invasive Schedule 9 plant species, such as Japanese knotweed (*Fallopia japonica*), were not identified at the site during the walkover survey. However, buddleia (*Buddleja sp.*) and snowberry (*Symphoricarpos x doorenbasii*) were identified on the south and south west boundary of the site. Buddleia and snowberry are not Schedule 9 species but are considered to be invasive species.

## 5 Evaluation, Legislation and Recommendations

5.1 Table 6 below includes a summary of all identified and potential ecological constraints to the development, including those where there is insufficient information at the time of survey to be definitive. Relevant legislation has been given here.

**Table 6:** Survey evaluation, relevant legislation and recommendations

Ecological Receptor	Summary of desk and walkover survey findings and relevant legislation	Likely impact and recommendations for further survey
Designated wildlife areas - statutory	<p>The desk study identified two SSSI's and seven LNR's within 7km of the site:</p> <ul style="list-style-type: none"> <li>• Moor Mill Quarry, West SSSI (1.4km south east);</li> <li>• Bricket Wood Common SSSI (1.9km south);</li> <li>• Watercress Wildlife Site LNR (3.1km north east);</li> <li>• Garston Park LNR (3.3km south);</li> <li>• Albans Wood LNR (3.7km south);</li> <li>• Harebreaks Wood LNR (5.3km south west);</li> <li>• The Wick Wood LNR (5.5km north east);</li> <li>• Colney Heath LNR (6.9km east); and</li> <li>• Fisher's Field LNR (7km south).</li> </ul>	The site is within several IRZ's for SSSI's and will meet the qualifying criteria for consultation between the LPA and NE if; the proposals include pipelines, pylons and overhead cables or any transport proposal including road, rail and by water (excluding maintenance).
Designated wildlife areas – non-statutory	<p>The desk study identified 20 LWS within 2km of the site:</p> <ul style="list-style-type: none"> <li>• How Wood LWS (600m east);</li> <li>• Birch Wood LWS (660m south east);</li> <li>• Park Wood LWS (1.1km north);</li> <li>• Scrubs Wood LWS (1.1km north west);</li> <li>• St Julian's Wood LWS (1.1km north east);</li> <li>• Blackgreen Wood LWS (1.1km south);</li> <li>• Holt Wood LWS (1.2km west);</li> <li>• Long Spring LWS (1.3km north west);</li> <li>• Moor Mill and Park Street Pits West Grassland LWS (1.4km south east);</li> <li>• Birch Wood LWS (1.5km north west);</li> <li>• Potterscrouch Section LWS (1.5km north west);</li> <li>• Winch Hill Wood LWS (1.5km south west);</li> <li>• Ashdale LWS (1.6km south);</li> <li>• Ver Valley Meadows LWS (1.7km east);</li> <li>• Frogmore Gravel Pit LWS (1.7km south east);</li> <li>• Featherbed Lane Copse by Serge Hill LWS (1.8km west);</li> <li>• Bricket Wood LWS (1.8km south);</li> <li>• Grassland at Former Radlett Aerodrome LWS (1.9km east);</li> <li>• Quarry at Former Radlett Aerodrome LWS (1.9km east); and</li> <li>• Moor Mill South LWS (1.9km south east).</li> </ul> <p>The small scale nature of the proposed development is unlikely to adversely impact the designated areas.</p>	No further assessment required.
Habitats	<p>The main habitats on the site comprise:</p> <ul style="list-style-type: none"> <li>• Semi-improved grassland;</li> </ul>	No further assessment required.

Ecological Receptor	Summary of desk and walkover survey findings and relevant legislation	Likely impact and recommendations for further survey
	<ul style="list-style-type: none"> <li>• Scattered scrub;</li> <li>• Hard-standing;</li> <li>• Buildings;</li> <li>• Ephemeral/short perennial;</li> <li>• Bare ground; and</li> <li>• Scatter/boundary trees.</li> </ul> <p>No habitats on site are NERC Priority Habitats.</p>	
Badger	<p>There was no evidence of badger activity on site during the walkover survey.</p> <p>The majority of the site is considered unsuitable for sett creation, however the northern boundary scrub provides suitable habitat.</p> <p>Badgers and their setts are protected under the Protection of Badgers Act 1992 and also protected by the Wild Mammals (Protection) Act 1996 and. Protection also extends to include disturbance.</p> <p>Under the Protection of Badgers Act 1992, it is an offence to intentionally or recklessly:</p> <ul style="list-style-type: none"> <li>• Kill, injure or take badgers;</li> <li>• Damage a badger sett or any part of it;</li> <li>• Destroy a badger sett;</li> <li>• Obstruct access to, or any entrance of a badger sett; and</li> <li>• Disturb a badger whilst it is occupying a badger sett.</li> </ul>	<p>6 months prior to the commencement of construction, a badger check should be undertaken for the presence of setts. This is to assess any likely adverse impacts on active setts / or badgers using a sett for shelter or protection. Setts can extend up to 20m underground from their entrance.</p> <p>Surveys can be undertaken all year round with the optimum period being February to April or September.</p> <p>If the proposed works are likely to adversely impact a sett, then a development licence would be necessary from Natural England prior to commencement.</p>
Bats	<p>Majority of trees within the site boundary were considered to have 'negligible' BRP due to no suitable roost features present.</p> <p>One tree to the north of the site considered to have 'moderate' BRP due to peeling bark and a woodpecker hole present.</p> <p>Chicken and storage sheds were present on site but provide 'negligible' BRP.</p> <p>The site was considered to have 'moderate' suitability for foraging and commuting bats due to boundary/scattered trees and scrub providing connectivity to the wider landscape.</p> <p>All species of bat are afforded full legal protection under Schedule 5 of the WCA. They are also listed under Schedule 2 of the Habitats Regulations. Some species of bat are also listed in Section 41 of NERC as Species of Principal Importance.</p> <p>Combined legislation makes it an offence: to deliberately kill, injure, capture/take a wild bat; intentionally or recklessly disturb bats, including whilst occupying a place of shelter or protection; to damage or destroy a place used by a bat for breeding or resting (does not need to deliberate, reckless or intentional); and to intentionally or recklessly obstruct access to any place used by a bat for shelter or protection.</p>	<p>For the tree with 'moderate' BRP, two surveys are required if this is to be demolished or impacted in any way by the development. The BCT Guidelines recommend a single emergence and a single re-entry survey for the tree.</p> <p>OR</p> <p>A climb and inspect survey can be undertaken to ascertain whether the potential features lead to potential roosts using endoscopes. If the features are still considered suitable then a single emergence survey will be required before removal/impact.</p> <p>The optimum months for emergence and re-entry surveys are from May to August, weather permitting.</p> <p>Emergence surveys commence 15 minutes prior to sunset to up to two hours after sunset; re-entry surveys commence two hours prior to sunrise, to sunrise. Surveys would be undertaken using electronic bat detectors and observation aids. The number of surveyors is determined by having to gain sufficient vantage</p>



Ecological Receptor	Summary of desk and walkover survey findings and relevant legislation	Likely impact and recommendations for further survey
	<p>Bats are classed as 'European Protected Species' (EPS) and mitigation will typically be undertaken under the auspices of an EPS licence from Natural England.</p>	<p>points around the outside and inside the buildings.</p> <p>If bats are discovered using the tree as a roost, works can only proceed under the auspices of a European Protected Species (EPS) licence granted by Natural England. Mitigation would be required to offset the loss of roost(s).</p> <p>It is recommended that boundary vegetation is retained to maintain connectivity for foraging and commuting bats. If boundary vegetation cannot be retained then further bat activity surveys will be required. For 'moderate' suitability habitat; one survey visit per month between April to October in appropriate weather conditions. At least one survey should comprise dusk and pre-dawn survey within the same 24 hour period.</p> <p>Lighting may need to be a consideration with respect to foraging bats.</p>
Hedgehog	<p>No evidence of hedgehogs was found. The site provides moderate hibernation and foraging habitat for hedgehogs in scrub and brash piles.</p> <p>Hedgehogs are listed on Schedule 6 of WCA which makes it illegal to kill or capture wild hedgehog, with certain methods listed. The hedgehog is also a species of principle importance under Section 41 of NERC.</p> <p>All the wild mammals protected under the Wild Mammals (Protection) Act 1996. Offences relate to any act which results in the intent to inflict unnecessary suffering. Mercy killings and killing in a swift and humane way in the course of a lawful activity are not offences under the Act.</p>	<p>It is recommended that, if scheduled for removal, brash piles are dismantled by hand. If scrub areas are to be removed then areas should be cut to 20cm using hand-held tools (brushcutter/trimmer) and checked for the species before removal.</p> <p>See Section 6 for enhancements.</p>
Birds	<p>The following habitats have the potential to support breeding birds:</p> <ul style="list-style-type: none"> <li>• Scattered/boundary trees;</li> <li>• Brash piles; and</li> <li>• Scrub;</li> </ul> <p>Several nests were present onsite during the walkover survey.</p> <p>All wild birds while actively nesting are afforded legal protection under the WCA.</p> <p>Special protection is also afforded to birds listed on Schedule 1 of the WCA which makes it an offence to disturb these species at nest or the dependent young.</p> <p>Combined legislation means that all birds, their nests</p>	<p>It is recommended that any vegetation clearance and building disturbance is undertaken outside of the nesting season. The nesting season is deemed to be from mid-March to mid-August, although these times can be temperature dependent.</p> <p><b>Timings and consideration will also be needed in relation to GCN.</b></p> <p>If this timing is not possible then a nesting bird check must be carried out by a suitably experienced person, no more than 48 hours between the check and the removal. If the 'all clear' is given, then removal/works can commence.</p>

Ecological Receptor	Summary of desk and walkover survey findings and relevant legislation	Likely impact and recommendations for further survey
	<p>and eggs are protected by law and it is an offence, with certain exceptions, to:</p> <p>a) intentionally kill, injure or take any wild bird;</p> <p>b) intentionally take, damage or destroy the nest of any wild bird while it is in use or being built;</p> <p>c) intentionally take or destroy the egg of any wild bird;</p> <p>d) have in one's possession or control any wild bird (dead or alive), part of a wild bird or egg of a wild bird;</p> <p>e) intentionally or recklessly disturb any wild bird listed on <b>Schedule 1</b> while it is nest building or is in, on or near a nest with eggs or young; or disturb the dependent young of such a bird; and</p> <p>f) have in one's possession or control any birds of a species listed on Schedule 4 of the Act unless registered in accordance with the Secretary of State's regulations.</p>	<p>If birds are found to be nesting, then no works should be undertaken within at least 7m of the nest until chicks have fledged.</p>
Reptiles	<p>Majority of habitats on site are considered unsuitable for reptiles due to grazed semi-improved grassland. However, the scrub and brash piles offer sheltering and hibernation opportunities.</p> <p>Common reptiles are afforded protection under Schedule 5 of the WCA from deliberate injury, killing and trade. They are also listed under Section 41 of NERC as species of Principal Importance.</p>	<p>It is recommended that the semi-improved grassland is kept grazed or mown on a regular basis and is not allowed to grow up. If the grassland becomes suitable in the future, further reptile surveys will be required.</p> <p>Reptile surveys can be undertaken from mid-march to mid-October in 'suitable weather conditions' i.e. when the temperatures are between 9 and 18 °C with no or little rain.</p> <p>An initial visit would be required to lay reptile refugia (bitumen felts) in suitable habitat. These warm up in the sun and act as lures to reptiles and must be left for a least seven days to bed in. the felts would then be visited seven times on separate occasions to establish presence / likely absence of reptiles.</p> <p>If reptiles are found, then mitigation would likely involve trapping and translocating the reptiles to a specific designated area on the site and managed as such. The level of mitigation would depend upon the result of the survey.</p> <p>If grassland is kept grazed/mown and scrub areas are to be removed then areas should be cut to 20cm using hand-held tools (brushcutter/trimmer) and checked for the species before removal.</p>
Amphibians, particularly GCN	<p>Two ponds were identified in the desk study, located within 500m of the site boundary. However, no access could be gained for these ponds during the walkover survey.</p> <p>Majority of the site is considered unsuitable terrestrial habitat for GCN. However, the scrub and brash piles offer sheltering and hibernation opportunities.</p>	<p>If brash piles and scrub are to be removed then works should take place between April and November, under the supervision of a GCN licenced ecologist (following Reasonable Avoidance Measures).</p> <p><b>Timings and consideration will</b></p>

Ecological Receptor	Summary of desk and walkover survey findings and relevant legislation	Likely impact and recommendations for further survey
	<p>Both aquatic and terrestrial habitat is protected under wildlife legislation.</p> <p>GCN is afforded full legal protection under Schedule 5 of the WCA. It is also listed under Schedule 2 of the Habitats Regulations. This species is also listed under Section 41 of NERC as a species of Principal Importance.</p> <p>GCN are classes as a 'European Protected Species' and any necessary mitigation is typically undertaken under the auspices of a licence from Natural England.</p>	<p><b>also be needed in relation to nesting birds.</b></p> <p>It is also recommended that the semi-improved grassland is kept grazed or mown on a regular basis and is not allowed to grow up. If the grassland becomes suitable in the future, further GCN surveys will be required.</p> <p>Further GCN surveys would involve a Habitat Suitability Index (HSI) assessment undertaken for the two ponds within 500m.</p> <p>Surveys can be undertaken anytime of the year. If the HSI score considered the ponds to be suitable for GCN, further surveys will be necessary in the first instance by testing for GCN presence/absence using the environmental DNA (eDNA) method.</p> <p>This requires a combined water sample to be taken from around the pond and sent to a specialist laboratory for analysis. Samples can be taken from 15<sup>th</sup> April to 30<sup>th</sup> June. A positive result will be given if GCN have occupied the pond.</p> <p>If the ponds are found to be positive for GCN eDNA, then further survey work will be required.</p> <p>This will require 6 visits for a population estimate. Surveys will be undertaken using traps/torches between mid-March and mid-June. At least 3 of these visits must be between mid-April and mid-May. It is therefore important that the eDNA samples are taken early in the season.</p> <p>A European Protected Species licence from Natural England will be necessary if adverse impacts to GCN are likely in the absence of mitigation or Reasonable Avoidance Measures.</p>
Invertebrates	<p>The habitats on site are unlikely to support a diverse assemblage of invertebrates. However, areas of scrub can be used by small numbers of invertebrates, such as butterflies and bees.</p> <p>Deadwood is present on site which can be used by stag beetles identified within the desk study.</p>	<p>No further surveys recommended.</p> <p>It is recommended that deadwood on site is kept in situ and protected during development to preserve stag beetle habitat. If this is not possible then the deadwood should be carefully moved to a suitable area nearby.</p> <p>See Section 6 for enhancemnets.</p>

Ecological Receptor	Summary of desk and walkover survey findings and relevant legislation	Likely impact and recommendations for further survey
Flora	<p>The habitats on site are unlikely to support any rare or protected flora.</p> <p>No Schedule 9 invasive plant species were identified on site. However, buddleia and snowberry were recorded on site which are considered an invasive species for developments, if not controlled.</p>	No further surveys recommended.

## 6 Ecological Enhancements

- 6.1 The proposed development is considered unlikely to be adversely detrimental to designated areas, protected species or habitats, provided the recommendations are followed in Table 6. However, a number of considerations and enhancements are recommended with respect to the overall biodiversity of the site in line with current Planning Policy.
- 6.2 Where possible, scrub and boundary/scattered trees on site should be retained and enhanced to create corridors and shelter/foraging areas for wildlife including birds, bats and small mammals.
- 6.3 The addition of standard bird boxes and bat boxes on retained trees will attract a greater diversity of birds and bats to nest/roost. Boxes should be located out of direct sunlight and close to, but not restricted by, vegetation.
- 6.4 Landscaping should incorporate native or wildlife attracting trees, shrubs, and wildflower areas as these would likely be of benefit to a variety of wildlife including, birds, bats and invertebrates, including pollinators.
- 6.5 'Hedgehog links' (i.e. 15cm diameter gaps at the base of fences) are recommended to enable small mammals to move through the development.

## **7 Conclusion**

- 7.1 A Preliminary Ecological Appraisal was undertaken at land at Noke Side, St Albans by James Blake Associates in support of a planning application.
- 7.2 The majority of the site comprises semi-improved grassland with scattered/boundary trees, scrub, buildings, hard-standing, bare ground and ephemeral/short perennial.
- 7.3 Further protected species surveys are recommended prior to development for badger, bats (depending on layout) and GCN (depending on layout). Further surveys for reptiles may also be required if the grassland is left to grow up in the future.
- 7.4 Precautionary measures have been given for birds, reptiles, GCN, hedgehog and stag beetles.
- 7.5 If any mitigation or compensation measures recommended following these further surveys is carried out, and if the precautionary measures detailed in this report are followed, it is considered that the development is able to proceed with minimal impact on the local conservation status of any protected, principally important or rare species within the area.
- 7.6 It is also considered that with a sensitive landscape scheme, and by including some, or all, of the additional enhancements, the site could be improved for local wildlife post development.

## 8 References

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## 10 Appendices

### Appendix A: Flora list identified during the walkover survey

Common Name	Scientific Name	Scattered/bound ary Trees	Scrub	Semi-improved Grassland
Beech	<i>Fagus sylvatica</i>	✓		
Blackthorn	<i>Prunus spinosa</i>	✓	✓	
Bracken	<i>Pteridium aquilinum</i>		✓	
Bramble	<i>Rubus fruticosus agg.</i>		✓	
Buddleia	<i>Buddleja</i>		✓	
Cleavers	<i>Galium aparine</i>		✓	✓
Common nettle	<i>Urtica dioica</i>		✓	✓
Dandelion	<i>Taraxacum</i>			✓
Dock sp.	<i>Rumex sp</i>		✓	✓
Dog rose	<i>Rosa canina</i>		✓	
Elm	<i>Ulmus procera</i>	✓		
Giant fescue	<i>Festuca gigantea</i>		✓	✓
Ground ivy	<i>Glechoma hederacea</i>		✓	
Hawthorn	<i>Crataegus monogyna</i>		✓	
Hedge bindweed	<i>Calystegia sepium</i>		✓	
Leyland cypress	<i>x Cupressocyparis leylandii</i>	✓		
Oak	<i>Quercus robur</i>	✓		
Pink snowberry	<i>Symphoricarpos x doorenbasii</i>		✓	
Pendulous sedge	<i>Carex pendula</i>		✓	
Spear thistle	<i>Cirsium vulgare</i>		✓	✓
Smooth meadow-grass	<i>Poa pratensis</i>			✓
Sycamore	<i>Acer pseudoplatanus</i>	✓		

**25 January to 5pm 8 March 2021**  
**'Call for Sites 2021' Site Identification Form**

St Albans City and District Council is in the process of preparing a new Local Plan 2020-2038. The 'Call for Sites' is an early opportunity for individuals, landowners and developers to suggest sites within the District for development over the next 15-20 years. The site suggestions received by us will be used to inform the preparation of the new Local Plan 2020-2038.

You are invited to put forward any new sites that you would like the Council to consider in its Housing Economic Land Availability Assessment (HELAA). These should be capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more). The Council will take account of the Strategic Housing Land Availability Assessment (SHLAA) submissions previously received since 2009 and therefore there is no need to resubmit these unless circumstances have changed. Sites from previous SHLAAs will form part of the Council's assessment. Proposed land uses can include:

- Housing
- Gypsy & Traveller Housing
- Mixed Use
- Employment
- Renewable and low carbon energy and heat
- Biodiversity Improvement / Offsetting
- Green Belt Compensatory Land
- Land for Tree Planting
- Other

To enable sites to be mapped digitally, please provide GIS shapefiles of your site, where possible.

The consultation period runs for six weeks between Monday 25 January to 5pm on Monday 8 March 2021.

Unfortunately, we cannot treat any of the information you provide as confidential.

**It is important to note that not all sites received through the 'Call for Sites' will be appropriate for consideration as part of the Housing Economic Land Availability Assessment (HELAA). As a general rule:**

**We encourage you to submit sites that are likely to become available for development or redevelopment between now and 2038.**

**Please do not submit sites that:**

- Are already included as a housing allocation in the St Albans District Local Plan Review (November 1994) – i.e. sites that are listed in 'saved' Policies 4 and 5.

- Have already been submitted to the Council for consideration via previous 'Call for Sites' and Strategic Housing Land Availability Assessment (SHLAA) processes (unless information is updated/changed).
- Already have planning permission for development, unless a new and different proposal is likely in the future; or
- Are situated outside St Albans City and District's administrative area.

If you wish to update information about a site previously submitted please complete the form below.

Please return the **form and site location plan** to the Spatial Planning and Design Team. We strongly encourage digital submissions via our online portal.

**By online consultation portal:**

<http://stalbans-consult.limehouse.co.uk/portal/>

**By e-mail to:** [planning.policy@stalbans.gov.uk](mailto:planning.policy@stalbans.gov.uk)

**By post to:** St Albans Council Offices, St Peters Street, St Albans, Hertfordshire, AL1 3JE

Due to COVID-19; offices being shut and officers working from home; submissions by post are discouraged.

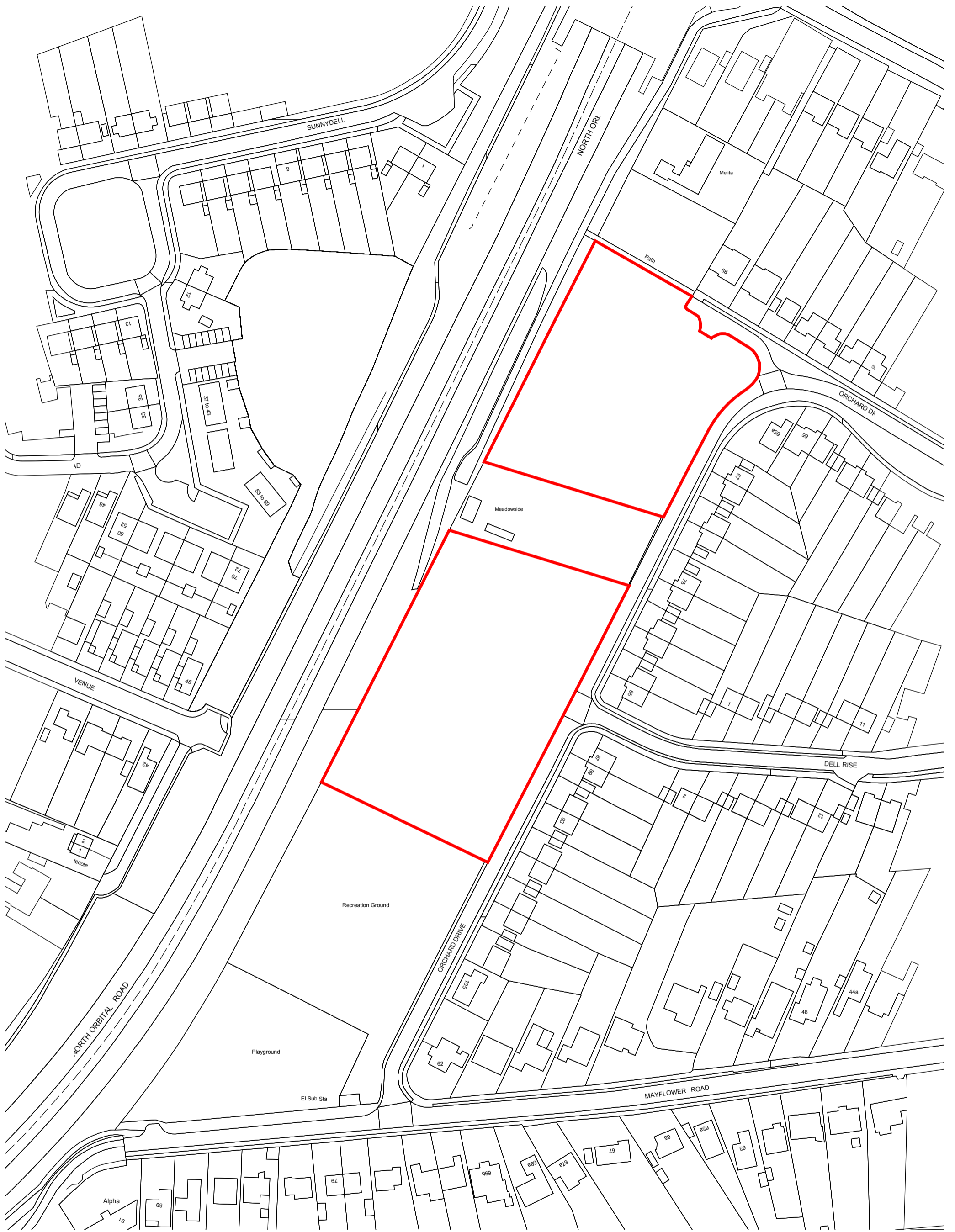
<b>Your Details</b>	
Name	Mr James Delafield
Company/Organisation	JB Planning Associates
Address	Chells Manor, Chells Lane, Stevenage
Postcode	SG2 7AA
Telephone	██████████
Email	████████████████████
Your interest	<input type="checkbox"/> Site Owner <input checked="" type="checkbox"/> Planning Consultant <input type="checkbox"/> Registered Social Landlord <input type="checkbox"/> Local Resident <input type="checkbox"/> Developer <input type="checkbox"/> Community <input type="checkbox"/> Other

<b>Site Details</b>					
<b>Requirements:</b>					
<ul style="list-style-type: none"> <li>• Delivers 5 or more dwellings or;</li> <li>• Provides economic development on sites of 0.25 hectares or more (or 500 square metres of floor space or more)</li> </ul>					
Site address/location (Please provide a map showing the site boundary)	Land at Orchard Drive, How Wood, St Albans				
Site area (in hectares)	1.35ha				
Coordinates	<table border="1"> <tr> <td>Easting</td> <td>513753</td> <td>Northing</td> <td>204124</td> </tr> </table>	Easting	513753	Northing	204124
Easting	513753	Northing	204124		
Site Location Plan Attached	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No				
GIS mapping shapefile attached (in .shp file format)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No				
Landownership (please include contact details if known)	[REDACTED]				
Current land use	Scrub and grassland				
Condition of current use (e.g. vacant, derelict)	Vacant				
Suggested land use	<input checked="" type="checkbox"/> Housing <input type="checkbox"/> Gypsy & Travellers <input type="checkbox"/> Mixed Use (please specify) <input type="checkbox"/> Employment <input type="checkbox"/> Renewable and low carbon energy and heat <input type="checkbox"/> Biodiversity Improvement / Offsetting <input type="checkbox"/> Green Belt Compensatory Land <input type="checkbox"/> Land for Tree Planting <input type="checkbox"/> Other (please specify)				
Reasons for suggested development / land use	Please see cover letter and enclosed promotional brochure				

Likely timescale for delivery of suggested development / land use	<input checked="" type="checkbox"/> 1-5 Years <input type="checkbox"/> 6-10 Years <input type="checkbox"/> 11-15 Years <input type="checkbox"/> 15+ Years
---	--

Site Constraints	Contamination/pollution issues (previous hazardous land uses)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Environmental issues (e.g. Tree Preservation Orders; SSSIs)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Flood Risk	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Topography affecting site (land levels, slopes, ground conditions)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Utility Services (access to mains electricity, gas, water, drainage etc.)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	Legal issues (For example, restrictive covenants or ownership titles affecting the site)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	Access. Is the site accessible from a public highway without the need to cross land in a different ownership to the site?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If no please provide details of how the site could be accessed. Without this information the site will not be considered to be deliverable).
	Other constraints affecting the site	<input type="checkbox"/> Yes (If yes, please specify) <input checked="" type="checkbox"/> No
Planning Status	<input type="checkbox"/> Planning Permission Granted <input type="checkbox"/> Planning Permission Refused <input checked="" type="checkbox"/> Pending Decision <input type="checkbox"/> Application Withdrawn <input type="checkbox"/> Planning Permission Lapsed <input type="checkbox"/> Pre-Application Advice <input type="checkbox"/> Planning Permission Not Sought <input type="checkbox"/> Other	

	<p>Please include details of the above choice below (for example planning reference numbers and site history)</p> <p>Ref: 5/2019/2487</p>
Other comments	<p>Please see cover letter</p>



Land at Orchard Drive, How Wood, St Albans  
SITE BOUNDARY PLAN

805.01  
Version 01  
Scale: 1:1250 @ A3  
06/02/17

© JB Planning Associates, 2017

metre 30 60



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JB/805/JD

2 March 2021

**By email: [planning.policy@stalbans.gov.uk](mailto:planning.policy@stalbans.gov.uk)**

Mr Chris Briggs  
Spatial Planning Manager  
Planning Policy Team  
St Albans Council Offices  
St Peters Street  
St Albans AL1 3JE

Dear Sirs

**St Albans City and District – Housing & Economic Land Availability Assessment Update – 2021 – ‘Call for Sites’**

We write on behalf of our client Hilton House Properties Ltd in respect of the above with regard to land at Orchard Drive, How Wood.

The site is vacant land divided in two by a residential property, “Meadowside”. It is bordered to the north and east by existing residential development, and to the south by Mayflower Road Play Area. Beyond this is further residential development to the south. Immediately to the west of the site is the A405, a dual carriageway and major arterial route into St Albans. This road forms a significant divide between How Wood and Chiswell Green. Trees and vegetation provide natural screening of the site from this road.

The 1.35 ha site was originally put forward on behalf of our client for consideration in respect of the 2008 SHLAA Call for Sites (ref: SHLAA-GB-HW-100). The officer’s conclusions from the original assessment of the site are set out immediately below:

**“The existing tree-lined A405 North Orbital Road lying immediately to the west is a significant feature separating the two settlements of How Wood and Chiswell Green physically, visually and in terms of their identity and function. Whilst this site is still primarily green space, it serves no real Green Belt purpose and is suitable in principle for housing, given that it is already surrounded on three sides by existing residential development.**

**Existing natural screening protects residential properties from the adverse impacts of the North Orbital Road and should be retained and enhanced as a natural buffer. The north western corner of the site is also covered by TPO woodland. Furthermore, a single detached dwelling (‘Meadowside’) occupies approx 0.1 ha in the centre of the site, whilst a recreation ground/ equipped play area is situated in the southern corner of the site. These constraints would reduce any net developable area”.**

The Assessment concluded that the site was available and achievable for housing. In response to the question ‘Is there a reasonable prospect that housing will be developed on the site?’- the officer’s response was **“Yes. After due consideration through the LDF process, given the site’s location in the Green Belt, on the edge of the specified settlement of How Wood”.**



The purpose of this letter is to reiterate that our Client remains fully committed to the delivery of housing on this site. As you may be aware, we have also been liaising closely with St Stephen Parish Council who are in the advanced stages of preparing their Neighbourhood Plan. The site has been identified as an allocation in the Regulation 14 draft for 30 dwellings (see Policy S25: land at Orchard Drive, Park Street). Whilst the NP may now progress to Examination without any site allocations, following the withdrawal of the Local Plan (which provided the strategic policy for amendments to be made to Green Belt Boundaries), we note that the evidence base remains to demonstrate that land at Orchard Drive is a suitable Green Belt release and a site that is supported locally.

You may also be aware that the site was the subject of an outline planning application (ref: 5/18/0509) submitted to St Albans District Council in February 2018. This application was refused by the District Council in October 2018 for a single reason related to the lack of 'very special circumstances' to justify development in the Green Belt.

A revised application was submitted in October 2019 and remains undetermined by the Local Planning Authority. This further application was made as it was considered that circumstances had moved on since the original refusal, particularly with the progress of the St Stephen Neighbourhood Plan. By October 2019, the Neighbourhood Plan was well advanced, and the published information from the Steering Group had already revealed that Land at Orchard Drive had been assessed as a "Green Site" and was likely to be included as a proposed allocation in the Regulation 14 Local Plan.

The proposals were also improved in the revised application to address a concern expressed by the Tree Officer on the original proposals in relation to the potential impact on trees. The Officer was concerned over the loss of 18 small and/ or immature category C trees, and also the proximity of one of the proposed dwellings (shown on the illustrative masterplan) to the woodland TPO boundary.

In preparing the revised application, careful consideration was given to further reducing tree losses by amending the illustrative masterplan to move the built form further away from the existing TPO boundary. This was achieved by repositioning a dwelling and has meant that the tree removals can be minimised to 5 closely bunched category C field maple self-set saplings and one category C hawthorn bush. All 6 are outside of the existing woodland TPO boundary, and are pioneer seedlings establishing in the unmanaged grassland beyond the tree belt. The Officer has confirmed in response to the revised application that this has addressed the previous concerns.

Turning to the questions on the 'Call for Sites – Site Identification Form', we set out further detail on the proposals for the site in the sections below.

### **Suggested Land Use**

Enclosed with our submission is an updated promotional brochure, which presents the latest Illustrative Masterplan for the site. This has been prepared to demonstrate how 30 units may be laid out across the site and takes full account of the Council's residential amenity standards in the Council's Design Advice Leaflet 1. Two parcels of development are proposed; the southern parcel containing 20 units, and the northern parcel containing 10.

Each parcel would be served by a principal access point from Orchard Drive; the southernmost access leading to 11 properties, and the northernmost to 3 properties via a short private drive. The remainder of the properties would have private driveways accessed directly from Orchard Drive.

The Illustrative Masterplan assumes a mix of 2, 3 and 4 bedroom detached and semi-detached homes, although the eventual mix will be determined through discussions with the District Council and Parish Council at the detailed design stage. The density of development is approximately 23dph, which is appropriate for a site comprising a mix of 2, 3 and 4 bedroom dwellings in the How Wood settlement area.

### **Timescales for development**

The site is owned solely by Hilton House Properties, which is owned by experienced local developers who intend to build out the site at the earliest opportunity.

Furthermore, the site is immediately available for development and, as discussed further below, is free from constraint. It is therefore expected that the development would be completed in years 1 to 5 of the new plan period.

A significant amount of technical work that has been undertaken to date, and this has confirmed that the necessary highways and drainage infrastructure is available to serve the scale of development proposed.

The development is therefore immediately deliverable and will make a valuable contribution to meeting the Council's shortfall in 5-year housing land supply.

### **Site Constraints**

The preparation of an outline planning application for the site has required an extensive amount of technical work to be undertaken and submitted to demonstrate that the suitability and deliverability of the site. The findings of the studies are summarised in the enclosed promotional brochure, although for ease of reference we pick out below those of relevance to the particular considerations identified in the questions on the Call for Sites Form.

#### **a) Contamination and Pollution Issues**

None. The site is vacant scrubland and has not been previously developed.

#### **b) Environmental Issues**

Ecological survey work indicates that the habitats found on site are common and of limited ecological value. The site is not considered to be constrained by protected species.

A number of ecological enhancements can be made, including the use of native species of local provenance in landscaping schemes and bird and bat boxes can be hung on mature trees. Enhancement of the woodland area would be beneficial for a range of species.

In view of the proximity of the North Orbital, an Air Quality Assessment has been undertaken to consider the impacts on future occupants from their exposure to prevailing levels of air pollution. Detailed atmospheric dispersion modelling has been undertaken, and pollutant concentrations are predicted to be within the relevant health-based air quality objectives at the facades of the proposed development. Therefore, air quality is acceptable at the development site.

A Noise Assessment has also been undertaken, which identifies that whilst the traffic on the North Orbital is a dominant source of ambient noise levels, an acceptable noise environment for future residents is achievable subject to suitable design measures. This includes the use of commercially available glazing and ventilation to achieve acceptable internal noise levels, and

the installation of a 1.8m imperforate timber barrier within the properties closest to the North Orbital to achieve acceptable external noise levels.

The site is visually well contained by landscape features and existing residential development. Public views are limited to glimpses from the A405 and those immediately adjacent the site from Orchard Drive and Mayflower Road Play Area. It is urban in character and does not form part of the wider countryside.

The belt of trees along the western edge of the site is its most significant landscape feature. Within the northern parcel, this includes trees which are protected by a 'woodland' Tree Preservation Order (TPO). Whilst the belt of trees is an important landscape feature, it is in need of positive management if it is to continue to be visually functional. Many of the trees are in poor condition, and the current 'woodland' TPO boundary is an arbitrary line which bears no relation to features on the ground. There is an opportunity to create a more logical boundary for the TPO, and an overall enhancement in terms of the number and quality of trees within the site.

A key principle for the development of this site is therefore to create a strengthened tree belt with a defined and logical boundary. This will provide a benefit in terms of creating a healthy and robust landscape buffer to the dual carriageway, to the benefit of existing and new residents.

### **c) Flood Risk**

A Flood Risk Assessment and Drainage Strategy has been prepared in consultation with Hertfordshire County Council, acting as Lead Local Flood Authority, and Thames Water.

This confirms that the site is at low or negligible risk of flooding from all sources. To address the drainage requirements of the proposed development, an outline strategy has been prepared to provide source control and attenuation of surface waters. Surface water will be directed to infiltration on the site and extensive infiltration tests have been carried out to quantify the amount of on-site attenuation. The balance of surface water attenuation will be managed through use of permeable paving and pipes which will convey flows to storage structures before discharging offsite.

### **d) Topography affecting site levels**

The site is a relatively flat site and can be developed without the need for the significant alteration of site levels.

### **e) Utility Services**

A predevelopment enquiry with Thames Water has confirmed that the existing foul water sewer that runs across Meadowside and Orchard Drive has sufficient capacity to accommodate the foul water gravity discharge from 30 proposed residential properties.

Access to mains electricity, gas and water is available from Orchard Drive.

### **f) Legal Issues**

None, the site is owned solely by Hilton House Properties and it intends to build it out at the earliest opportunity.

### **g) Access**

A Transport Statement has been prepared in consultation with the Local Highway Authority. This Statement demonstrates that safe and appropriate vehicular access can be provided to both development parcels which form the site. The local road network is lightly trafficked and of an appropriate standard to accommodate the additional site generated vehicle movements.

### **Conclusion**

The analysis set out above, and discussed further in the enclosed promotional brochure, reinforces the Council's conclusions set out in the 2009 SHLAA that the site is suitable for residential development, and that it is achievable, available and deliverable.

We have also identified in our promotional brochure how the emerging proposals for the site could deliver significant community benefits including the provision of affordable homes, and improvements to the local environment through noise mitigation, ecological enhancements and the upgrading of Mayflower Road Play Area and the adjacent public footpaths.

In summary, we consider that the key merits of the site are:

- It has excellent potential for development as a small-scale release from the Green Belt, for up to 30 dwellings, and is able to make an important and early contribution towards meeting the Council's overall housing requirement and 5-year land supply;
- The North Orbital (A405) provides permanent separation between the two settlements of How Wood and Chiswell Green. The tree belt adjacent to the road provides visual screening and further emphasises the separation of these two neighbourhoods, which are physically well separated, and have distinct characters;
- It does not make any significant contribution to the separation of these neighbourhoods. Instead, its character is closely related to the residential development which surrounds it on three sides. It performs no significant Green Belt function and is therefore suitable for residential development. The existing tree belt adjacent to the dual carriageway can be enhanced to provide additional benefits in terms of screening and ecological improvements, creating a healthy and robust landscape buffer to the dual carriageway, to the benefit of existing and new residents; and
- The site is well located to encourage local trips to be undertaken on foot and by bicycle, with a range of key facilities such as primary schools; a doctor's surgery and dental practice; post office and local shops within walking and cycling distance.
- It is also located within 20 minutes' walk of How Wood and Park Street train stations, which run local services on the Abbey Line into St Albans and Watford, where main line connections are available to London, and for points north including Luton Airport. There are also several bus stops within walking distance of the site, providing services to numerous local centres.
- Given its location within the Green Triangle and its proximity to public transport and major road connections to the key institutions which form the Hertfordshire EnviroTech Enterprise, a new housing development at the proposed site would be in a prime position to support the Council's economic growth strategy.



Please let us know if you require any further information and we look forward to discussing the planning merits of the site with you further in the future.

Yours sincerely



James Delafield MRTPI  
Senior Associate



Encs. Call for Sites – Site Submission Form  
Promotional Brochure  
Site Boundary Plan (805.01)

# Local Plan 2020–2036 and St Stephen Neighbourhood Plan

Proposed Housing Allocation

## Land off Orchard Drive, How Wood

**“The exceptional circumstances exist to support the release of the site from the Green Belt and its allocation to meet local housing needs.”**

St Albans City & District Council (SACDC) has resolved to undertake a review of Green Belt boundaries in order to inform the long term strategy for future growth in the District. It has been concluded by SACDC that there is insufficient land available within existing urban areas to deliver the level of growth required to meet local needs throughout the forthcoming Local Plan period and beyond, and therefore there is a need to accommodate new housing within areas currently designated as Green Belt, if SACDC is to meet future housing needs.

This brochure has been produced in this context, in order to highlight the potential contribution that can be made by this particular site to sustainably meeting future local development needs, without harming the purposes of the Green Belt.

## Planning Context

SACDC's current Local Plan is one of the oldest in the country, dating back to 1994, and urgently needs to be replaced. In the absence of an up-to-date Local Plan, a policy vacuum exists with respect to the delivery of new homes. In such circumstances, housing market signals in St Albans clearly indicate a very high and worsening affordability issue as demand outstrips supply.

### Emerging Local Plan

In 2020, SACDC commenced work on its new Local Plan, which is to cover the period up to 2038. The purpose of the Local Plan is to set a new housing target for the District, and determine how this is to be met, both through urban sites and new allocations on greenfield sites involving the release of land from the Green Belt.

From 2017 until 2020, SACDC had been preparing a Local Plan (LP), which proposed to meet a housing requirement of 913 homes a year. The focus in terms of meeting this requirement was the identification of strategic allocations of a minimum size of 14 hectares or 500 dwellings. The LP did not make any provision for

small or medium sized housing allocations of a non-strategic nature, albeit did support in principle Neighbourhood Plans that could justify development at a neighbourhood scale on land currently designated as Green Belt.

In taking this approach SACDC sought to reflect paragraph 136 of the National Planning Policy Framework (NPPF) which identifies that, where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.

Following submission of the LP for Examination, the appointed Planning Inspector convened initial hearings to consider legal compliance matters, and subsequently concluded in writing to SACDC that the legal Duty-to-Cooperate (DtC) had not been met. A principal concern was that the Council has failed to engage "constructively and actively" with its neighbouring authorities on strategic matters. A further issue was that, in looking at Green Belt releases,

the narrow focus that has been placed on only strategic sites may have ruled out a number of smaller sites that have been found to impact least on the purposes of the Green Belt. Subsequently, SACDC was invited to withdraw the LP and undertake further work to meet the requirements of the DtC.

SACDC will need to address these shortfalls as part of the preparation of its new Local Plan.

### St Stephen Neighbourhood Plan

St Stephen Parish Council commenced work on a Neighbourhood Plan in 2015. Three public consultation events were held in each of the parish wards in 2015 to launch the Neighbourhood Plan. A community survey followed in September 2016 which provided local residents with the opportunity to have their say on the fundamental issues for the Plan to address. This community survey was reopened in February 2017 alongside a Call for Sites, in which landowners have been asked to put forward land to be considered for allocation in the Neighbourhood Plan. Land at Orchard Drive was put forward at this time.

The Regulation 14 draft Neighbourhood Plan (NP) was published in October 2020 for a 6-week consultation. The draft NP highlights the lack of available and suitable sites within the existing built-up area boundaries of the three main settlements within the Parish as a major challenge. It refers to the extensive site assessment process that was undertaken during the preparation of the Neighbourhood Plan, and that of the 77 sites coming forward via the Call for Sites process, the 9 assessed as most suitable for development are all located within Green Belt.

Land at Orchard Drive was one of these sites and was identified at the top of a list of 6 that made it forward as proposed allocations in the draft NP. The decision to identify it as an allocation is endorsed by the findings of the “Strategic Environmental Assessment” (June 2020), prepared to support the draft NP. This justifies the identification of the site as an allocation, noting the site serves no real Green Belt purpose and is suitable in principle for housing. It is given a traffic light rating of ‘green’, in recognition that it shows no constraints and is appropriate as a site allocation.

The failure of the submitted LP to progress through examination has, however, frustrated the ability of the Neighbourhood Plan to allocate sites in the Green Belt as it no longer has the benefit of an emerging strategic policy which enables detailed amendments of Green Belt boundaries to be made through Neighbourhood Plans.

Despite this, the evidence base remains to demonstrate that land at Orchard Drive is a suitable Green Belt release and that this is supported locally.

### **Land at Orchard Drive, How Wood**

Land at Orchard Drive is owned by Hilton House Properties. It has excellent potential for development as a small-scale release from the Green Belt, being immediately available and suitable for the delivery of around 30 homes and will therefore make an important contribution towards meeting the SACDC’s overall housing target and provide local homes for the How Wood community.

The site extends to approximately 1.35 ha and is divided in two by a residential property, “Meadowside”. It is bordered to the north and east by existing residential development, and to the south by Mayflower Road Play Area, which is maintained by St Stephen Parish Council.

Beyond this is further existing residential development to the south. Immediately to the west of the site is the A405, a dual carriageway and major arterial route into St Albans. This road forms a significant divide between How Wood and Chiswell Green.

The specific environmental issues relating to the site’s potential development are considered in this brochure, and no significant adverse impacts are identified.





## Green Belt Review

When considering a review of Green Belt boundaries it is necessary to consider the contribution that sites make to the 5 purposes of Green Belts, which are described in the NPPF (paragraph 134) as follows:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;

- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Land Use Consultant (LUC) have been commissioned to assess the contribution the site makes towards the 5 Green Belt purposes and the degree of harm (or otherwise) to the Green Belt that may occur as a result of the development of the site. The findings may be summarised as follows:

**Purpose 1:** checking the unrestricted sprawl of large build up areas – the site makes no contribution to checking sprawl.

**Purpose 2:** preventing the merger of neighbouring towns – the site makes only a limited contribution to this purpose.

**Purpose 3:** safeguarding the countryside from encroachment – the site is unconnected to the wider Green Belt and entirely contained by residential and major road development and as such makes only a partial contribution.

**Purpose 4:** preserving the setting and special character of historic towns – the site makes no contribution to this purpose.

**Purpose 5:** assisting in urban regeneration by encouraging the recycling derelict and other urban land – the distinction between different levels of contribution to this purpose cannot be drawn.

LUC’s overall conclusion is that, with the retention and enhancement of vegetation alongside the A405 as a revised Green Belt boundary, there would be no wider Green Belt harm, and that the harm resulting from release of this land would be low-moderate.

### **St Albans Council’s SHLAA Conclusions**

SACDC is required to carry out a comprehensive review of potential housing sites across the District to establish the availability of suitable sites to meet its housing need. This is now known as a Housing and Economic Land Availability Assessment (HELAA), but was previously referred to a Strategic Housing Land Availability Assessment (SHLAA).

The site was originally assessed within the 2009 SHLAA, which reached the following conclusion: **“The existing tree-lined A405 North Orbital Road lying immediately to the west is a significant feature separating the two settlements of How Wood and Chiswell Green physically, visually and in terms of their identity and function. Whilst this site is still primarily green space, it serves no real Green Belt purpose and is suitable in principle for housing, given that it is already surrounded on three sides by existing residential development.”**

The assessment further suggests that the release of the site from the Green Belt would create a more clearly defined, robust long term boundary. SACDC’s assessment concludes that the site is suitable for residential development, and that it is available and deliverable.

## Principles for Development

### Landscape and Trees

As recognised in the Council's previous SHLAA assessment, the site is visually well contained by landscape features and existing residential development. Public views are limited to glimpses from the A405 and those immediately adjacent the site from Orchard Drive and Mayflower Road Play Area. It is urban in character and does not form part of the wider countryside. The proposed development of 30 two-storey dwellings would not be out of scale and character with the surroundings.

The belt of trees along the western edge of the site is its most significant landscape feature. Within the northern parcel, this includes trees which are protected by a 'woodland' Tree Preservation Order (TPO). Whilst the belt of trees is an

important landscape feature, it is in need of positive management if it is to continue to be visually functional. Many of the trees are in poor condition, and the current 'woodland' TPO boundary is an arbitrary line which bears no relation to features on the ground. There is an opportunity to create a more logical boundary for the TPO, and an overall enhancement in terms of the number and quality of trees within the site.

A key principle for the development of this site is therefore to create a strengthened tree belt with a defined and logical boundary. This will provide a benefit in terms of creating a healthy and robust landscape buffer to the dual carriageway, to the benefit of existing and new residents.

### Ecology

Ecological survey work indicates that the habitats found on site are common and of limited ecological value. The site is not considered to be constrained by protected species.

A number of ecological enhancements can be made, including the use of native species of local provenance in landscaping schemes and bird and bat boxes can be hung on mature trees. Enhancement of the woodland area would be beneficial for a range of species.

### Acoustics

A Noise Assessment has been undertaken, which identifies that whilst the traffic on the North Orbital is a dominant source of ambient noise levels, an acceptable noise environment for future residents is achievable subject to suitable design measures.

This includes the use of commercially available glazing and ventilation to achieve acceptable internal noise levels, and the installation of a 1.8m imperforate timber barrier within the properties closest to the North Orbital to achieve acceptable external noise levels.

