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Herts Landscape
Growth and Infrastructure Unit
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TEL: 01992 555205
EMAIL: Landscape@hertfordshire.gov.uk
REF: 5/2022/2443
DATE: 24 NOVEMBER 2022

Dear Case Officer,

REFERENCE: 5/2022/2443
PROPOSAL: Outline application (access sought) - Demolition of existing buildings and construction of up to 115 dwellings and creation of new access
ADDRESS: Bricket Wood Sports And Country Club, Paintball Site & Bricket Lodge Lye Lane Bricket Wood Hertfordshire AL2 3TF

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

LANDSCAPE POLICIES & MATERIAL CONSIDERATIONS

NATIONAL PLANNING POLICY FRAMEWORK¹

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

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

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

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

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

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

ST ALBANS CITY & DISTRICT LOCAL PLAN (SAVED POLICIES 1994)

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

Supplementary planning documents: Design Advice Leaflet No.1 – Design and Layout of New Housing

Tree Preservation Orders - YES

LANDSCAPE CHARACTER ASSESSMENT, STRATEGY & GUIDELINES⁴

The site lies within landscape character area Bricket Wood.

An area of mixed land uses and transitional character, including considerable woodland, unrestored mineral workings, educational, industrial, horticultural and arable land. The area has undergone significant change in the 20th century and is impinged upon by settlement at Bricket Wood and How Wood, together with a marked severance by the M25. The historic pattern is well preserved in Bricket Wood Common, but eroded in many other locations, showing poor management and some dereliction.

The condition is assessed as Good and the strength of character is assessed as Strong, the overall strategy for managing change is to Safeguard and Manage.

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

- *Support the Watling Chase Community Forest in the realisation of its objectives for the area*
- *Promote the creation of additional woodlands, particularly with a view to visually integrating the intrusive motorways, urban fringe development and former mineral sites*
- *Promote both the creation of new ponds and the retention/enhancement for wildlife of existing ponds*
- *Ensure that ancient lanes and their associated hedgerows, ditches and hedgebanks are retained, protected, enhanced and integrated into new development with due regard to their historic, ecological and landscape value*

⁴ Landscape Character Assessment and Guidelines for Southern Hertfordshire, The Landscape Partnership 2001
<http://webmaps.hertfordshire.gov.uk/environmentpublic/index.htm>

BASELINE STUDIES⁵ & ASSESSMENT

LANDSCAPE & VISUAL IMPACT ASSESSMENT⁶

The following comments are given with regards to the submitted Landscape and Visual Impact Assessment, May 2022, ubu design (LVIA).

LANDSCAPE BASELINE

- The LVIA does not acknowledge the location of the site within the Watling Chase Community Forest Area. The LVIA judges landscape value as 'medium/low' however it is suggested that this, and the overall judgment of sensitivity (which is currently 'medium'), should be higher due to the presence of this designation that in particular is reflected in the woodland that encloses and is affected by the site.

LANDSCAPE EFFECTS

- The LVIA (Table 8) determines that the '*setting of the site*' and '*local character area in the vicinity of the site*' will experience a 'small' magnitude of change of minor neutral or beneficial significance. This judgment is not supported and there is concern that the significance of effects is much greater for the following reasons.

The existing settlement pattern within the site, and extending northwards along Lye Lane, is currently strongly characterised by distinct clusters of relatively large dwellings and ancillary outbuildings, or groupings of agricultural buildings, set within large scale, open and spacious landscape grounds. This distinct swathe of low-density development is well defined and enclosed by existing vegetation to the east south and west and is distinctly separate from the denser urban settlement pattern of How Wood to the east.

The proposed development is completely at odds with this prevalent character and will introduce a denser settlement pattern, and more compact terraced housing typology that is more in keeping with a town or village centre.

VISUAL EFFECTS

- The LVIA concludes that the receptors that experience the greatest effects are the two residential receptors in immediate proximity of the site, and Lye Lane. However these are not considered significant.

However these judgements rely on the assumption that '*reinforcement planting and planting across the development*' will be introduced. However, as discussed below in relation to embedded mitigation, the current layout does not provide any confidence that this can be delivered.

⁵ Descriptions of the conditions as existing or committed (e.g. environmental), against which changes arising from a proposed development are predicted and assessed. (National Design Guide)

⁶ Comments are given in line with Guidelines for Landscape and Visual Impact Assessment Third edition, Landscape Institute and Institute of Environmental management and Assessment (GLVIA3)

EMBEDDED MITIGATION

- The proposal to retain the existing boundary vegetation is supported in principle, however appropriate buffer zones are required in line with policy and guidance. See comments with regards to Arboricultural Impact Assessment.
- That LVIA states that the *'Setting the built form into the site, with surrounding landscape buffers and areas of open space, will help to mitigate any visual impact'* and *'Providing a high-quality landscape scheme that responds to the local character and enhances the ecological value of the site as well as increasing the aesthetic and recreational quality of the site'*

Again these aims are broadly supported in principle, however there is fundamental concern that the submitted 'Proposed Site Plan – revision C' does not deliver on them. Indeed the plan serves to demonstrate that the proposed housing, highway and parking layout is so tightly packed that the scheme does not have sufficient space to accommodate an integrated green infrastructure and open space network, or soft landscaping. There needs to be a sufficient balance of structural planting within the public realm and the streetscene, that is not at risk of removal by residents, which can be managed and maintained in the long term. This should include structural planting that can achieve a decent mature canopy that will break up the built horizon.

The location of public open space within the left-over spaces at the edges of the development, within the landscape buffers and root protection areas of the adjacent tree/ woodland planting, is not supported. A fully integrated green infrastructure and open space network should permeate throughout the built area to provide multiple important environmental benefits such as shading and urban cooling, filtering of air pollution, noise attenuation, surface water management, habitats for wildlife etc.

- The scheme is dominated by hard surfacing including extensive continuous runs of car parking, resulting in a poor quality streetscene and amenity. The NPPF requires that new streets are treelined, however there is no opportunity to provide trees, or other structural planting, due to the runs of parking bays.
- The hierarchy, character and function of open space types is not evident. The play area and public open space is surrounded by highways, forcing users to cross the street to access it.
- There is no indication of any SuDS features – there should be fully integrated within the landscape layout now, and not retrofitted to the left over space further down the line.

ARBORICULTURAL IMPACT ASSESSMENT⁷

- The proposals affect existing hedgerows, trees and their canopies and root protection areas, within and near to the site, including ancient woodland and trees subject to preservation orders.

In particular, in the absence of this information it is not possible to understand the impact of the proposed highways works including the access points, their associated

⁷ Comments are given in line with BS 5837:2012 Trees in relation to design, demolition and construction – Recommendations.

turning radii and visibility splays, and the new 2m wide footways, upon the existing hedgerows and trees and the ancient woodland.

A tree report is therefore required, and should include a tree survey, arboricultural impact assessment, tree protection plan, and method statement compliant with 'BS 5837:2012, *Trees in relation to design, demolition and construction – Recommendations.*'

Furthermore, in line with policy and standing advice, ancient woodland requires a buffer zone⁸ of at least 15 metres from the boundary of the woodland. Development including gardens should not be located within buffer zones / they should consist of semi-natural habitats (woodland / mix scrub, grassland heathland, wetland).

ACCESS

- There is fundamental concern for the impact of the proposed access and highways works upon the character of Lye Lane and existing landscape features, including some ancient woodland. There is concern that the approach is not compliant with the landscape character assessment and neighbourhood plan (policy S6) seek to '*Ensure that ancient lanes and their associated hedgerows, ditches and hedgebanks are retained, protected, enhanced*' and '*maintain existing green verges and hedgerows and encourage the planting of new hedgerows*' respectively.

As discussed above – an arboricultural impact assessment is required to demonstrate the impact the impact of the proposed highways works including the access points, their associated turning radii and visibility splays, and the new 2m wide footways, impact upon existing trees and vegetation. The loss of vegetation should be voided in the first instance and any unavoidable removals should be adequately mitigated.

CONCLUSION

- At this stage there is fundamental concern for the acceptability of the proposals which promote a highly urban density and approach which is completely at odds with the more rural landscape character and lower density settlement pattern of the site and surrounding area.
- In addition the proposals lack a demonstrable landscape strategy, and do not provide confidence that the mitigation aims, or a green infrastructure and open space network, and sufficient balance of soft landscaping can be accommodated throughout the built area.

Yours sincerely,



Jennifer Owen
Landscape & Building Futures Team Leader
Herts LEADS (Landscape Ecology Archaeology Design Sustainability)

⁸ Planning Practice Guidance– Policy 70 (viii)