

1st June 2022

Lee Stannard
St Albans City & District Council
Civic Centre
St Peter's Street
St Albans AL1 3JE

Sent via email

Dear Mr Stannard,

Additional Information for Re-consultation

Application Reference: 5/2022/0267

Land Between Caravan Site and Watling Street, Park Street, St Albans, Hertfordshire

Further to the responses to this application from the statutory consultees, please find below a summary of the further information being submitted for re-consultation.

Drainage

Following the response from Thames Water dated 7th March, please find attached further correspondence between Hydrock and Thames Water regarding the Drainage Strategy for the site. The email from Leigh Khan dated 17th March confirms that there is sufficient capacity for both the foul and surface water flows, with the latter having been reduced to 2.0l/s as per the attached Proposed Foul & Surface Water Drainage Strategy (ref: 20880-HYD-XX-XX-DR-D-2200-P03).

Recycling and Waste

In response to the Recycling and Waste Officer's comments from the 8th of March, we would highlight that this is an outline planning application and the Illustrative Layout Plan is intended to be indicative only at this stage. That said, we appreciate the concerns raised in relation to the need for more defined refuse collection areas which are closer to the main roads. The amended Illustrative Layout Plan (ref: SCOT210806-IL-01-C) proposes a way in which this could be addressed, with the detail to be agreed with Officers through the detailed design as part of a future reserved matters application, should outline planning permission be granted.

Ecology

As requested by the Herts and Middlesex Wildlife Trust in the response dated 15th of March and also the Herts LEADS response dated 16th May, please find attached the full Biodiversity Metric in Excel format (ref: 21-1589). Please note that a summary report was provided with the application as it is not possible to upload Excel files to the planning portal. We have no issue with the principle of the conditions proposed, but would comment that any biodiversity net gain condition should ensure a minimum of 10% net gain, not a minimum of 29.72% (as suggested by the Wildlife Trust).

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Highways

The response from HCC Highways dated the 24th of March requested additional details in relation to accidents on Watling Street, outputs from the traffic survey data, and the proposed Travel Plan. These additional details have been discussed further with representatives of HCC Highways and the information is provided in the following new and updated documents:

- Transport Statement Addendum (ref: v2.0)
- 2021 Traffic Data (Zip file)
- (Amended) Travel Plan (ref: v6.0)

Minerals and Waste

We note from the comments from the Minerals and Waste Officer dated the 24th of March that the proposals may give rise to 'opportunistic' use of limited materials within the development, and that this would be encouraged by the County Council. As such, we would propose that an appropriate condition is attached to any planning permission, with a potential basis for the condition wording provided below.

“With the exception of any site clearance works, site investigation works and tree protection works, no development in relation to each phase of this permission shall take place until a Mineral Safeguarding Assessment and Mineral Management Plan for that phase has been submitted to and approved in writing by the local planning authority in consultation with the minerals planning authority. The Mineral Safeguarding Assessment shall assess the potential for the onsite reuse of mineral resource arising from groundwork, drainage and foundation excavations in accordance with an agreed methodology. The Mineral Management Plan will identify for each phase of development the type and quantum of material to be reused on site, and the type and quantum of material to be taken off site and to where. The development shall then be carried out in accordance with the Mineral Management Plan unless otherwise agreed in writing by the local planning authority.”

Developer Contributions

The response from the Growth & Infrastructure Officer dated the 31st of March details the contributions sought in respect of primary education secondary education, special educational needs and disabilities, library services, youth services, and monitoring fees. These contributions are agreed in principle, and we will look to agree Heads of Terms for the S106 Agreement and instruct solicitors in due course.

Landscape

The response from Herts LEADS dated the 28th of April provided analysis of the visual assessment methodology, and sought further detail and amendments to the proposed mitigation measures. These points have been addressed in the following new and updated documents:

- Landscape Technical Note (ref: 22-0196)
- (Amended) Landscape and Visual Impact Assessment (ref: 21-0781 v4)
- (Amended) Illustrative Layout Plan (ref: SCOT210806-IL-01-C)

It is suggested that further detail regarding the mitigation measures will be provided through the detailed design to support any future reserve matters application, and that the indicative proposals demonstrate that it will be possible to achieve the required mitigation on-site.

Agricultural Land Classification

Please find attached an Agricultural Land Classification Report prepared by Ceres Rural, which confirms that the vast majority of the site (85%) comprises Grade 3b (Moderate Quality) agricultural land, which is not defined as the best and most versatile agricultural land in the NPPF. The remaining 0.67ha in the northern tip of the site comprises Grade 3a land. Therefore, the proposed development of the site would not result in the loss of any Grade 1 or Grade 2 agricultural land, and the 0.67ha of Grade 3a (best and most versatile agricultural land) sits at the lowest end of this grading.



Neighbourhood Plan

We understand that residents recently voted in favour of the St Stephen Parish Neighbourhood Plan, so it is progressing towards adoption. As such, the policies within therein will now carry additional weight, and a Planning Statement Addendum (ref: 220519) has been prepared to provide a more detailed assessment of how the proposed development responds to the relevant Neighbourhood Plan policies.

Please let me know if any further information is required in respect of the above, or indeed any other aspect of this planning application.

Yours sincerely,



Richard Martin

Director



Annexures:

- A. Email from Thames Water (17th March 2022)
- B. Proposed Foul & Surface Water Drainage Strategy (ref: 20880-HYD-XX-XX-DR-D-2200-P03)
- C. Biodiversity Metric in Excel format (ref: 21-1589)
- D. Transport Statement Addendum (ref: v2.0)
- E. 2021 Traffic Data (Zip file)
- F. (Amended) Travel Plan (ref: v6.0)
- G. Landscape Technical Note (ref: 22-0196)
- H. (Amended) Landscape and Visual Impact Assessment (ref: 21-0781 v4)
- I. (Amended) Illustrative Layout Plan (ref: SCOT210806-IL-01-C)
- J. Agricultural Land Classification Report (May 2022)
- K. Planning Statement Addendum (ref: 220519)

