

# NICHOLSONS LOCKHART GARRATT

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Our Ref: 22-0458

Mr R Winsborough  
Scott Properties  
Suite 5, Oyster House,  
Severalls Lane,  
Colchester,  
Essex CO4 9PD

By Email: richardw@mscott.co.uk

25<sup>th</sup> July 2022

Dear Mr Winsborough

## **LAND WEST OF WATLING STREET, PARK STREET, ST ALBANS**

I write with regard to the proposed residential development on land west of Watling Street, Park Street, St Albans (referred to as the 'Site'), in response to comments received from St Albans Council with regards to Spatial Planning.

The comments from the Council relate to the principle of development, very special circumstances, and housing land supply and mix, and suggests a neutral recommendation. The comments refer in detail to the Metropolitan Green Belt, and therefore I have made the following comments in response.

The Council has quoted various national and local Green Belt policy documents, including the NPPF, PPG Paragraph: 001 reference ID: 64-001-20190722 and the St Albans Local Plan (saved 2009).

It is our opinion that the proposed development does not harm the openness of the Green Belt nor does it conflict with the five purposes of including land in the Green Belt, as set out in Paragraph 138 of the NPPF. In drawing this conclusion, we have considered the transitional sub-urban character of the Site, its natural separation from the overall larger Green Belt parcel in which the Site is located, as a result of the mature vegetation structure surrounding the Site, and the proposed layout and scale of the development, within what could be considered as a 'rounding off' of the existing settlement edge.

The Council also refers to the SKM Green Belt Review Parts 1 and 2. Within Part 1: Green Belt Review Purposes Assessment (Nov 2013), the Site is located within parcel GB28. It is worth noting that the Site comprises a very small part of this overall larger parcel, comprising approximately 6% of this overall area. It is also proposed that circa 35% of the Site will be comprised of public open space and landscaped areas.

It is considered that the development of this small section of parcel GB28 would not prevent the overall larger parcel from retaining its significant contribution towards maintaining the existing settlement pattern, or its partial contribution towards preventing merging and safeguarding of the countryside. It is also notable that the purpose that the Council's assessment finds parcel GB28 to make a 'significant' contribution to is not one of the purposes set out within Paragraph 138 of the NPPF. Rather, it is a local-level standard that the Council's assessors have devised, and as such it should be attributed less weight than the purposes that are enshrined within national planning policy. It also appears to entirely duplicate the second national purpose, evidenced in the fact that the list of questions set out in the table on page 7 of the Annex 1 document (questions 3-8 and questions 14-19) is exactly the same for both purposes.

In terms of maintaining the existing settlement pattern, it is considered that the settlement pattern of Park Street is linear, with development lying parallel to Watling Street, with some wider clusters of built form to the north-east and south-west. The proposed development would in our opinion retain and contribute to this linear settlement pattern, with development running parallel to Watling Street and infilling a gap along the existing western settlement edge.

The proposals would also not extend the settlement edge any further west than that which currently exists, demonstrated to the south of the Site, along Old Orchard and Hawfield Gardens, which extends further west beyond the Site's southern boundary.

It is also considered that the retention of the majority of parcel GB28 would allow the settlement pattern of How Wood and Chiswell Green to be retained and unaffected by the proposed development. It would also serve to continue to prevent the merging of settlements and safeguard the area of countryside between the Site and the A405.

With regard to the potential impact of development on the openness of the Green Belt, referred to within the Council's comments on page 2, it is judged that any potential harm is likely to be very localised, given the already visible presence of the settlement edge both along the western edge of Park Street, and the northern edge of How Wood, as well as the existing containment of the Site through existing mature vegetation structures.

The inclusion of a robust landscape mitigation strategy which is supported by Hertfordshire Landscape is likely to further contain the Site from the Green Belt to the west, enhancing the existing vegetation.

Therefore, it is our opinion that the Site represents a 'rounding off' of the existing settlement pattern, whilst retaining and contributing to the existing settlement pattern. It is also our opinion that as a result of the very small percentage of the GB28 parcel that is proposed for development, it would not cause significant harm to the openness of the remaining overall parcel, or its ability to contribute to the Green Belt purposes.

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Yours sincerely

A handwritten signature in black ink that reads "A.C. Barrett". The signature is written in a cursive style with a large initial 'A' and 'B'.

Alison Barrett BSc (Hons)  
Landscape Consultant