

WRITTEN STATEMENT ON BEHALF CREST NICHOLSON
Stage 2 Hearing Sessions – Week 4, Hearing Day 12 (4 November 2025)
Regulation 19 Submission Number: 266

Inspector's Matter 7 – Residential Site Allocations

Issue 2 – Harpenden and Hatching Green Site Allocations

Policy B2 – North East Harpenden

Q1 What is the site boundary based on and is it justified and effective? What is expected of development proposals within the area retained as Green Belt?

- 1.1 The North East Harpenden site provides a logical extension to the northeastern edge of Harpenden. It wraps around the built-up area of Batford which is contiguous with the southern boundary and is bound by existing highways along the majority of its eastern boundary (Common Lane), part of the northern boundary (Bower Heath Lane) and part of the western boundary (B653 Lower Luton Road). The remainder of the northern boundary is marked by mature trees and hedgerow. In short, the site is physically and visually contained by existing permanent features and reads as a single land parcel. It is therefore justified, effective and defensible in the long-term.
- 1.2 The area retained in the Green Belt falls entirely under the control of Crest. Policy B2 is clear that outdoor sports provision can be provided in the land remaining in the Green Belt. This would be appropriate uses as defined in the Framework.
- 1.3 The Joint Illustrative Masterplan (Appendix 2 of Crest's Regulation 19 representations) shows sports pitches alongside allotments, associated car park and an extensive area of public open space/ parkland in the land remaining within the Green Belt. These are all appropriate uses that would be for the benefit of the whole allocation and wider community.

Q2 What is the justification for the proposed alteration to the Green Belt boundary? Is the proposed boundary alteration consistent with paragraph 148 e) and f) of the Framework, which state that plans should be able to demonstrate that boundaries will not need to be altered at the end of the Plan period, and, define boundaries clearly, using physical features that are readily recognisable and likely to be permanent?

- 1.4 The Council has undertaken a number of Green Belt studies/ assessments since 2013 that culminate in the St Albans Stage 2 Green Belt Review: Final Report (June 2023) (ref. GB 02.02). The southern part of the Site has been consistently assessed as having potential for Green Belt release with the northern part remaining in the Green Belt to provide a more 'regular' settlement edge to Harpenden.

- 1.5 The new Green Belt boundary for North East Harpenden follows the alignment of an existing surfaced track that runs from Common Lane to Public Right of Way 034. The western extent of the new Green Belt boundary then follows Public Right of Way 034 to Bower Heath Lane. These are existing physical features that are clearly discernible on the ground.
- 1.6 Crest is at an advanced stage in pre-application discussions on an outline application for its portion of the North East Harpenden site. This provides for retention and upgrading of the existing track and PRoW to provide active travel routes that solidify their role as the physical and visual boundary to the land remaining within the Green Belt.
- 1.7 The land remaining within the Green Belt is to provide the public open space, sports and allotment provision to meet the needs of the allocation as a whole.
- 1.8 In summary, alternation of the Green Belt boundary on the Site has been informed by extensive assessment on the role and function in this location and as part of the wider Green Belt around Harpenden which supports partial release. The new Green Belt boundary is based on existing physical features on the ground that will be enhanced as part of forthcoming planning applications to provide a defensible boundary for the long-term.

Q3 Do the exceptional circumstances exist to justify amending the Green Belt boundary in this location?

- 1.9 As set out in Crest's Matter 3 written statement, it is clear that exceptional circumstances exist in the District to amend the Green Belt boundary at the strategic level. At the settlement level, Harpenden is the second-tier settlement to which the District-wide exceptional circumstances equally apply. Amendment of the Green Belt boundary in this particular location allows a meaningful amount of new homes and additional facilities including a new primary school and local centre, with the potential to include a healthcare facility, to be delivered, directly addressing the exceptional circumstances.

Q4 How have the mix of uses been established and how will development proposals come forward in a coordinated and coherent manner?

- 1.10 Additional uses to residential have been signalled in Policy B2 as part of a local centre. This includes local services, healthcare and commercial. There is also provision for a new 2FE primary school. Such uses will provide for a degree of self-containment thus reducing the need for travel outside of the Site and promoting opportunities for travel by non-car means from the new homes and those in the neighbouring Batford community.
- 1.11 They also provide opportunities to meet needs that may arise for, inter alia, additional school places and healthcare facilities. As per Crest's Regulation 19 representations, as currently drafted, point 4 definitively requires a 'Medical Centre' as part of the local centre. Crest has engaged with the local community in the preparation of its outline application and local stakeholders including GP practices where there is a clear desire to see additional healthcare provision on the Site. However, need/ demand will change over time. Whilst Crest will be seeking healthcare use in the local centre as part of a flexible range of uses, the delivery of this will depend on outside funding and a partner to take forward the space. If this is not forthcoming, alternative use will come forward to ensure a vibrant and viable local centre is delivered on the Site. As such Crest requests that point 4 is modified to include 'if a need is demonstrated' after Medical Centre.
- 1.12 Crest has engaged throughout its pre-application process with Hertfordshire County Council on the primary school to refine, inter alia, its location, overall site size and configuration.

- 1.13 As a result of this engagement, Crest is also proposing a children's home within its emerging proposals (in line with the Proposed Main Modifications, September 2025: SADC/ED85B). This responds to the need for this type of facility and HCC's strategy¹ for increasing opportunities for children to remain within their community (where appropriate). This will take the form of a modified standard house type, capable of accommodating three children but externally indistinguishable from neighbouring homes.
- 1.14 In terms of coherence/ coordination across the allocation, there are four parties that have been working collaboratively to promote the Site for residential-led development for over 10 years through the previous and current local plans. The below shows the extent of land controlled by each of the parties:



Figure 1: Land control of Site Allocation B2: North East Harpenden

- 1.15 Previous representations have been submitted collectively, and individually, including the preparation of a Joint Framework Plan to show how the allocation as a whole can come forward in a coherent and coordinated manner. An updated version of the Illustrative Framework Plan is enclosed at Appendix A.
- 1.16 Crest and Miller Homes are both at an advanced stage in the pre-application process and have held regular coordination meetings over the last c. 12 months on matters such as masterplanning, connectivity and sharing of technical information. This has included a coordinated approach to vehicular access to both parcels from the Lower Luton Road which has been agreed with County Highways (see further detail below in response to Q5).
- 1.17 At the southern extent of its landholding Crest has utilised survey and technical information to inform the optimum alignment of the primary street connection to the southern part of the allocation that does not predetermine masterplan options on this land and facilitates its delivery.
- 1.18 The parties are committed to continuing to work collaboratively to bring forward a high-quality addition to Harpenden as envisaged through Policy B2.

¹ [Hertfordshire's plan for children and young people 2021-26 | Hertfordshire County Council](#) [accessed 15/10/2025]

Q5 *Can a safe and suitable access to the site be achieved? Is it sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?*

- 1.19 Crest's transport consultants, SLR, have provided a separate response to Q5 which is enclosed at Appendix B. This sets out the extensive pre-application discussions that have been undertaken with Hertfordshire County Council Highways and adjoining landowners to develop safe and suitable vehicular access that is agreed between the parties. This is alongside an integrated movement and access strategy for all modes (foot, cycle, bus) that provides permeability throughout the allocated site.
- 1.20 SLR's response also covers off-site improvements and should be read alongside this hearing statement.

Q6 *How have the landscape impacts of the allocation been considered? Can the site be delivered in a way that avoids harmful landscape impact?*

- 1.21 The Council's landscape evidence base documents provide an assessment of the landscape visibility and impacts of development on Broad Locations including North East Harpenden (Broad Locations – Landscape + Visual Appraisal, September 2024). This sets out potential development effects and suggested mitigation measures and provides a starting point for more fine-grained assessment of landscape and visual impacts.
- 1.22 Crest has adduced landscape evidence to support the development of the Site at various stages in the preparation of the previous and this current local plan. This has been consistent with the Council's evidence on potential effects and mitigation and demonstrated how development could be assimilated into the existing and an augmented landscape framework.
- 1.23 In the preparation of its outline planning application proposals, Crest has instructed Bradley Murphy Design to undertake a full landscape and visual appraisal and inform the proposals including the parameter plans. This has resulted in refinement of the masterplan to locate the local centre where highest building heights are envisaged to the northern plateau with lower building heights on the valley slopes and towards the ridge to limit visibility. Green corridors are proposed that follow horizontal contours and will provide screening and structure to development that further mitigates harm in the wider landscape.
- 1.24 A Landscape Technical Note (10 October 2025) is enclosed at Appendix C that draws together the landscape assessment undertaken with reference to the Council's evidence base, visual analysis from key receptors and mitigation to further confirm that the site can come forward for the development envisaged through Policy B2 without harmful landscape impacts.

Q7 *Is Policy B2 justified, effective and consistent with national planning policy? If not, what modifications are required to make the Plan sound?*

- 1.25 For the reasons set out in Crest's previous submissions and above, Policy B2 is, in principle, justified, effective and consistent with national planning policy. Refinements are, however, required to ensure that is, inter alia, sufficiently flexible to adapt to changing needs/ circumstances over time and does not prescribe matters that prevent the optimum scheme coming forward.
- 1.26 The Proposed Main Modification wording for Policy B2 is set out below alongside Crest's requested further modifications:

Table 1: Requested Further Modifications to Policy B2

SADC Proposed Main Modifications	Crest Requested Further Modifications	Explanation
1. One extra care facility comprising of 70-80 self-contained housing with care units (these units are included within the indicative dwellings figure).	Amend to <u>60-80</u> housing with care units.	To reflect the appropriate scale of a development of this nature and provide flexibility to providers.
1A. <u>A children's home to accommodate three children in care and one manager.</u>	None.	N/A
2. A site for and appropriate contributions towards a <u>A 2FE primary school site and contributions,</u> including Early Years provision and an all weather <u>artificial grass junior</u> sports pitch available for community use.	Remove requirement for all-weather artificial grass junior sports pitch or amend to a requirement if the on-site sports pitches are not provided.	Query the need/ justification for seeking an all-weather artificial pitch at the school in addition to the sports pitches within the land remaining within the Green Belt. For HCC to comment further.
3. On-site outdoor sports provision (which could be within the part of the site remaining in the Green Belt) to meet the additional needs generated by the development should be provided. An offsite facility may be acceptable where justified by evidence and subject to early delivery of the offsite provision prior to occupation of first home.	None.	N/A
4. A new local centre to provide local services, including Medical Centre and commercial development opportunities.	Include 'where there is a demonstrated need' after Medical Centre.	As set out above. To allow for alternative use of there is not a need for a healthcare facility.
5. <u>Delivery of /</u> Contributions enhancements to support relevant schemes in the LCWIP and GTPs as indicated in the TIA.	Add 'proportionate' after contributions.	To recognise that there will be multiple developers on the Site and to ensure contributions are CIL Regs compliant.

SADC Proposed Main Modifications	Crest Requested Further Modifications	Explanation
6. Support for improvements <u>Improvements via delivery or contributions</u> to walking facilities along Common Lane to mitigate impacts on this road, especially at school pick-up / drop-off times. This potentially needs to include footway / cycleway from site to Common Lane, then improved crossings and side junction improvements.	Add 'proportionate' after contributions.	To recognise that there will be multiple developers on the Site and to ensure contributions are CIL Regs compliant.
7. Support for improved <u>Improvements via delivery or contributions</u> to access to Katherine Warrington school is required including active travel connections to the school through the site.	Add 'proportionate' after contributions. This could also be combined with point 6 as they both relate to connection improvements to Katherine Warrington school.	To recognise that there will be multiple developers on the Site and to ensure contributions are CIL Regs compliant. Combine with point 6 to avoid duplication of requirements.
8. Support <u>Improvements via delivery or contributions to the Upper Lea Valley Way into Harpenden and out to Luton and for links to / from and improvement of the Upper Lea Valley Way into Harpenden and out to Luton.</u>	Add 'proportionate' after contributions.	To recognise that there will be multiple developers on the Site and to ensure contributions are CIL Regs compliant.
9. Support for improvements <u>Improvements via delivery or contributions</u> to the Public Rights of Way that link into the wider network to enable recreational use.	Add 'proportionate' after contributions.	To recognise that there will be multiple developers on the Site and to ensure contributions are CIL Regs compliant.
10. Development proposals must take appropriate account of all trees protected by Tree Preservation Order and the small area of deciduous woodland Priority Habitat adjacent to the site.	None	N/A

SADC Proposed Main Modifications	Crest Requested Further Modifications	Explanation
11. Take appropriate account of these Environmental Constraints: Flood Zone 2, adjacent to main river (River Lea) – chalk stream; Source Protection Zone (SPZ) 3; Bedrock Aquifer. There must be no residential development outside Flood Zone 1.	None	N/A

APPENDIX A



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all dimensions to be checked on site and architect notified of any discrepancies prior to commencement. do not scale.

any and all elements relating to the fire safety of the building will require separate confirmation and approval by a fully accredited fire engineering consultant who has to be appointed by the Client.

- notes:
- Crest Boundary
 - Miller Boundary
 - Wymmes and Scott Boundary
 - Sauncey Land Boundary
 - Common Lane
 - Primary Street
 - Extension of Bower Heath Lane
 - PROW
 - Active Travel
 - Wider Connection Points
 - PROW outside of the site allocation
 - Connecting pedestrian route
 - Potential Miller Access
 - Residential Development
 - Green Belt
 - Existing Landscape
 - Sports Pitches
 - School
 - Elderly Care
 - Local Centre
 - Structural Landscape

A 15.10.25 Revised to incorporate the extension of Bower Heath Lane SM SM
rev: date: comment(s): name: check:



ARCHITECTS.
URBAN DESIGNERS.
PROJECT MANAGERS.
LANDSCAPE ARCHITECTS.
WE ARE IDP.

status: **FOR CLIENT ONLY** RIBA Stage: 1

client: Crest Nicholson

job: Lower Luton Road, Harpdenen

title: Wider Framework Plan

drawn: TKB date: 02.07.2025

checked: TKB scale @ a1: 1:2000

job no: C6017 drg no: FP001 Rev A

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APPENDIX B

Crest Nicholson Chiltern (Crest)

Land North East of Harpenden between Lower Luton Road, Bower Heath Lane and Common Lane

SLR Project No.: 141499

15 October 2025

Revision: 1

RE: ST ALBANS CITY & DISTRICT COUNCIL LOCAL PLAN (MATTERS, ISSUES AND QUESTIONS)

1.0 Introduction

- 1.1 These representations are made on behalf of Crest Nicholson Chiltern (Crest) by SLR Consulting Ltd (SLR). Crest are seeking to bring forward the majority of the NE Harpenden strategic housing allocation identified under Policy BE2.

2.0 Matter 7 – Residential Site Allocations

Issue 2 - Harpenden and Hatching Green Site Allocations

Q5

“Can a safe and suitable access to the site be achieved? It is sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?”

- 2.1 Taking this question in the two parts:

Can a safe and suitable access to the site be achieved?

- 2.2 As part of pre-application discussions relating to the Crest element of Broad Location B2 allocation, discussions have been held with both St Albans District Council (SADC) as the local planning authority and Hertfordshire County Council (HCC) as the local highway authority.
- 2.3 These discussions have been in the context that the strategy for access for all modes of transport needs to ensure that the whole proposed allocation can be developed ie the access must cater for all of the Broad Location.

- 2.4 Discussions have also be held with the landowners of other elements of the Broad Location where this has been feasible. Detailed discussions have been held with Miller Homes and their transport advisors.
- 2.5 The proposed access strategy that has been agreed with HCC following the pre-application discussions is:
- 1) A new access from the Crest element of the proposed allocation onto Lower Luton Road to the east of the junction with Westfield Road in the form of a priority junction with a ghost right turn lane that is capable of serving the whole of the proposed allocation and accommodating the existing traffic on Bowers Heath Lane (see below). This new access will accommodate buses entering and leaving the Broad Location;
 - 2) The diversion of Bowers Heath Lane through the Crest element of the proposed allocation;
 - 3) The closure of the existing junction between Lower Luton Road and Bower Heath Lane except for access to one existing dwelling and for use by pedestrians, cyclists and equestrians. This effectively means that there is not an additional junction onto Lower Luton Road;
 - 4) The potential of an access further east on Lower Luton Road to the Miller Homes land that complies with national and HCC design guidance;
 - 5) An access onto Common Lane for buses, pedestrians and cyclists with the potential for emergency vehicle access;
 - 6) Within the Crest element of the proposed allocation vehicular accesses to the Wimms & Scott land and Miller Homes land will be provided. The access to the Wimms & Scott land will accommodate buses;
 - 7) All of the above vehicular access will incorporate access for pedestrians and cyclists;
 - 8) There will be additional access for pedestrians via the existing Public Rights of Way which will be maintained. There are connections to both the north crossing Common Lane and to east into Batford which provides a route to Katherine Warington Secondary School; and
 - 9) As stated above, the new access onto Lower Luton Road will accommodate buses entering the site. Buses could then passes through the Crest and Wimm and Scott elements of the Broad Location to join Common Lane via the new access for buses, pedestrians and cyclists and potential emergency vehicles.
- 2.6 The vehicular accesses onto Lower Luton Roads are shown on the plan contained in **Appendix A**. This also shows the proposed signal controlled crossing of Lower Luton Road and how the existing junction with Bowers Heath Lane will be reduce to be a private drive to one residential unit and a route for pedestrians, cyclists and equestrians.



- 2.7 The detailed design of all of these elements will be agreed with HCC and SADC during the planning application process. At this stage the design has been developed to a stage to demonstrate that the access strategy is feasible.
- 2.8 The access onto Bowers Heath Lane would be designed in accordance with national and HCC design guidance.

It is sufficiently clear to users of the Plan what any necessary highway improvements would entail, and where and how they would be delivered?"

- 2.9 The context for infrastructure to support the identified Broad Allocations is set out at a high level in Policy LG1. In transport related terms this policy includes the following requirements:

"a) Demonstrate a coordinated, Masterplanned approach to development with appropriate input from the District and County Council, statutory consultees, local communities, landowners and other stakeholders; including Dacorum Borough Council for Hemel Garden Communities. The approach should be in accordance with the District's Strategic Sites Design Guidance 6;

b) Be undertaken in a coordinated way where there are different landowners;

c) Demonstrate accordance with Local Plan policies and the requirements set out in Part B;

f) Provide necessary transport, community, green, health and other infrastructure in a timely manner to support development;

l) Demonstrate how the proposal integrates with and where appropriate seeks to improve the existing transport network with reference to the LCWIP. Proposals should include excellent walking and cycling links, including accessible routes and public transport services upgrades / improvements;"

- 2.10 In Part B of the Local Plan entitled "Local Plan Sites" the following "Key development requirements" are set out for the Broad Location B2 East Harpenden:

5. *"Contributions / enhancements to support relevant schemes in the LCWIP and GTPs as indicated in the TIA.*
6. *Support for improvements to walking facilities along Common Lane to mitigate impacts on this road, especially at school pick-up / drop-off times. This potentially needs to include footway / cycleway from site to Common Lane, then improved crossings and side junction improvements.*
7. *Support for improved access to Katherine Warington school is required including active travel connections to the school through the site.*



8. *Support for links to / from and improvement of the Upper Lea Valley Way into Harpenden and out to Luton.*
9. *Support for improvements to the Public Rights of Way that link into the wider network to enable recreational use.”*

2.11 Policy TRA1: Transport Considerations for New Development then states:

“a. Proposals must demonstrate:

- i. That safe and suitable access can be provided for walking, cycling and vehicles, accommodating equestrians where appropriate;*
- ii. That development would not lead to highway safety problems or cause unacceptable impacts upon the transport network; and*
- iii. Suitable evidence in relation to i. and ii, including the provision of suitable Transport Statements or Transport Assessments along with other appropriate evidence where required.*

b. Major proposals must demonstrate as appropriate how:

- i. Measures to reduce the need to travel by private car are identified and implemented;*
- ii. Active and sustainable connections to key destinations are deliverable at an early stage of development;*
- iii. The proposed scheme would be served by public transport and would not have a detrimental impact to any existing or planned public transport provision;*
- iv. Safe, direct and convenient routes for active journeys to key destinations are provided and prioritised in their design;*
- v. Comprehensive and coherent integration into the existing pedestrian and cycle, Rights of Way, public transport and road networks will be secured;*
- vi. Adequate servicing arrangements will be provided;*
- vii. The needs of people with disabilities and reduced mobility will be addressed;*
- viii. The charging of plug-in and other ultra-low emission vehicles will be enabled in safe, accessible and convenient locations;*



ix. Suitable travel plans will be provided and appropriate measures for implementation will be secured. Such plans will set out measures to encourage people to use alternative modes of travel to single occupancy car use; and

x. Suitable mechanisms will be provided to secure sustainable transport measures, including delivery of schemes identified in the LCWIP, Bus Service Improvement Plan, Growth & Transport Plan and IDP and improvements to the existing highway network and other appropriate transport mitigations, including as identified in Supporting Documents to the Local Transport Plan.”

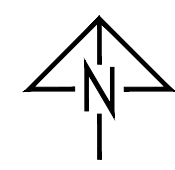
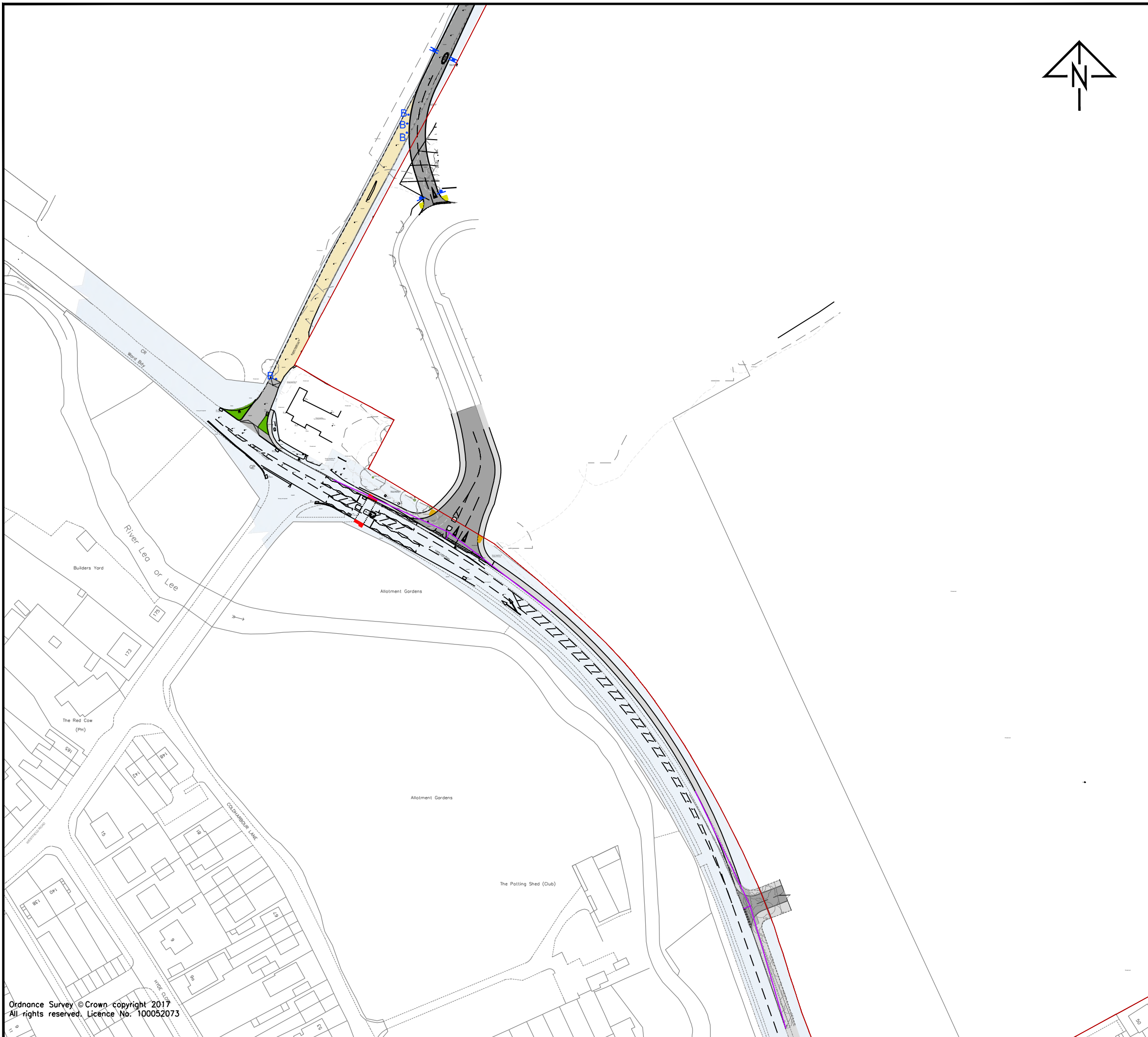
- 2.12 It is considered that the requirements in Policy LG1 which incorporate the requirements set out in Part B of the Local Plan together with the requirements of Policy TRA1 provide very clear guidance in relation to the transport infrastructure needed to support development in Broad Location B2.
- 2.13 This is subject to the comments made in the response given separately to Policy TRA1 under Matter 10.
- 2.14 In the Transport Assessment that will be submitted to support any planning application for development at Broad Location B2 the requirements set out in the Local Plan will need to be considered in detail and where appropriate a package of transport improvement and mitigation measures will need to be proposed.
- 2.15 Within the Transport Assessment consideration will be given to the need for any improvements to the highway network surrounding the Broad Location to determine whether there would be a severe impact in terms of road safety and highway capacity that need to be addressed. It is not considered appropriate for this detailed assessment work to need to be undertaken for every proposed allocation providing there is confidence that if there is a need for mitigation it can be provided. This has been considered in detailed as part of the compilation of the evidence base for the Local Plan and the various documents identified in paragraph b(x) of Policy TRA1.
- 2.16 Two key elements of the evidence base in this respect are the Infrastructure Delivery Plan and the Infrastructure Delivery Schedule which includes consideration of the need for Highways, Rail Services, Bus Services and Walking and Cycling improvements. In the Infrastructure Delivery Schedule the following improvements are related to the North East Harpenden Broad Location:
- Walking and Cycling - B653 Lower Luton Road pedestrian and cycle crossing
 - Walking and Cycling - Active travel improvements for North East Harpenden site
 - Highways - Highways Access to support development at North East Harpenden
- 2.17 There are no specific offsite highway improvement schemes identified.



- 2.18 In summary it is considered that the Local Plan provides clear guidance on the transport related infrastructure required to support development at Broad Location B2. The Local Plan also provides clear guidance on what the assessment needed to support a planning application needs to consider and set out in a Transport Assessment.



Appendix A Initial Site Accesses Design from Lower Luton Road



Notes:

1. This is not a construction drawing and is intended for illustrative purposes only
2. White lining is indicative only.
3. Southeastern access is based on TPA drawing : 2008-046 SK04 Rev B

Key

- New Carriageway
- Pedestrian / Cycle / Equestrian route
- Access to Driveway (102 Lower Luton Road)
- New Verge
- New Footway
- Allocation Boundary
- Highway Boundary
- 2.4m x 43m (MFS) junction visibility splay

REV.	DETAILS	DRAWN	CHECKED	DATE

CLIENT:
Crest Strategic Projects

PROJECT:
Lower Luton Road, Harpenden

DRAWING TITLE:
Policy B2 - North East Harpenden: Proposed Vehicular Access Arrangements

SCALES:
1:1250 at A3

DRAWN: PP	CHECKED: ID	DATE: 14.10.2025
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DRAWING NUMBER: 141499/SK/19	REVISION: -
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Making Sustainability Happen

APPENDIX C

TECHNICAL NOTE

Project: North East Harpenden

Ref: BMD.24.0039.RP.TN.003

Subject: Landscape Technical Note

Date: 10.10.2025

Status: For Information

Rev: -

LANDSCAPE - TECHNICAL NOTE

Following a request from Crest Nicholson Chiltern ('Crest'), Bradley Murphy Design Ltd. (BMD) have prepared this high-level landscape Technical Note (TN) to summarise - from a landscape and visual perspective – how landscape impacts of the allocation land 'North East Harpenden between Lower Luton Road, Bowers Heath Lane and Common Lane' have been considered and how the Site can be delivered in a way that avoids harmful landscape impact.

BMD have been working with Crest since the start of 2024, advising on landscape and visual, green belt and green infrastructure matters - in collaboration with the wider consultant team, to explore how the land at North East Harpenden could play a part in a sustainable regeneration and future growth of the town.

A Landscape and Visual Appraisal Technical Note (LVA TN) was prepared by BMD in November 2024 to report a high-level consideration of the Site to accommodate residential-led development and provide recommendations of associated landscape mitigation measures, to minimise landscape and visual impacts and as an integral part of the masterplan evolution for the allocation site.

The LVA TN identifies key visual receptors with views toward the Site and who have the potential to be impacted by the Proposed Development.

As described in the Hertfordshire Landscape Character Area Statements - St Albans District, within LCA 33 Upper Lea Valley, there are extensive views into the area from the adjacent plateau areas and views along the valley are locally interrupted by belts of trees and small woodlands around the parks. Visual sensitivities are localised and comprise the built edge of the existing settlement of Harpenden. The LCA 34 Blackmore End Plateau is only locally visible from the surrounding area as a result of its elevated topography.

Most views of the Site are constrained to its immediate vicinity, including close range views from public footpath Harpenden 035 running through the Site, public footpath Wheathamsptead 060 off Common Lane to the north of the Site, Porters Hill Park to the south of the Site and from existing residential properties in Batford, that side or back onto the Site. Further afield, there are partial cross valley views of the west facing, upper valley slopes of the Site, where it transitions to the plateau, from elevated vantage points. The western part of the Site is located in the low lying Lea valley and is generally not visible from the wider landscape - due to the extent of screening provided by intervening mature hedgerows, trees, woodland, landform and built form.

The visual analysis of the Site, as part of the LVA, identifies those visual receptors that currently share intervisibility with the Site and are of the greatest visual sensitivity to the type of development proposed, and those parts of the Site that are visually sensitive to Proposed Development including:

- The upper parts of the valley slopes and the ridgeline (c. +121m AOD), where it transitions to the plateau are the highest areas of visual sensitivity. These parts of the Site are open and exposed in cross valley views from the west.

- The Site's ridgeline forms the transition between the landscape character of Upper Lea Valley slopes to the Blackmore End Plateau.
- The edge of the plateau and ridgeline affords open distant views out to Luton Airport, to the north, and cross valley views out to Harpenden and the wider countryside, in the west.
- The Site's west facing slopes are visible in cross valley views, however landform falls towards Lea Valley and is seen in the context of existing residential development in Batford and Harpenden.
- The Site's plateau landform falls to the south eastern corner and is more wooded in context due to the woodland, tree and hedgerow features internally and on the Site boundaries, forming visual enclosure.
- The existing Greenacres Equestrian Centre is the lowest lying part of the Site and least visually sensitivity, due to the combination of low lying landform, existing vegetation and connection with the existing settlement edge of Harpenden.

Following the landscape and visual analysis as part of the LVA TN, and on consideration of findings, a **Landscape Capacity and Green Infrastructure Plan** was produced (see **Figure A** below), which illustrates opportunities and constraints, summarises potential development capacity of the Site and highlights how the Site can be delivered in a way that avoids harmful landscape and visual impact.

It is considered that the Site, has the capacity to accommodate future residential development - set within a strong landscape framework as illustrated in **Figure A** - and can be accommodated with limited impacts to the landscape and views from the surrounding context. It is considered that targeted green infrastructure mitigation and enhancements are required, as illustrated in **Figure A** and detailed in the design recommendations, listed below, to strengthen landscape and visual assimilation – with the opportunity for the provision of new public open space, community growing and recreational facilities.

1. Provide layers of landscape buffer planting as part of multi-functional green corridors running through the Site to help visually assimilate the built form into the views. This approach will seek to reflect and contribute to the existing vegetated roofline character that defines the current settlement edges of Batford and Harpenden.
2. Strengthen and extend the hedgerow and tree planting along the ridgeline (c. +121m AOD), - to help provide effective screening of the new development that will be situated within the eastern part of the Site.
3. Locate highest built form away from ridgeline and centrally within the plateau, where more visually enclosed. Ensure that tall buildings would not be located on the visually prominent ridgeline, where topography transitions from valley slopes to plateau, ensuring built form here is restricted to up to two storeys in height. This ensures that the Proposed Development would not form a prominent feature on the skyline of existing cross valley views from receptors to the west of the Site.
4. Height of proposed built form should reflect the interface with the existing settlement edge of Batford and Harpenden, which are formed by 2 to 3 storey, to provide a sympathetic transition with the northern sub-urban edge of Batford.
5. New woodland should be created to improve the wooded character of the valley slopes and plateau in the Green Belt. This will help mitigate the visual impact of the proposed built form, in particular from elevated distant locations, such as those from the western valley slopes.
6. Additional planting provided to reinforce the existing boundary vegetation, particularly on visually open boundaries.

Further measures incorporated into the **Landscape Capacity and Green Infrastructure Plan** to reduce the landscape impact of Proposed Development on the allocation Site include:

- Retaining, where possible, existing vegetation, on the Site boundaries and running internally through the Site, supplementing with additional landscape buffer planting. This includes strategic connection of existing woodlands, hedgerows and trees within the Site and to the surrounding network.
- Retaining the existing internal field boundary hedgerow with substantial trees (ref: H9) internally within the Site, including safeguarding TPO No. 1950: T4.
- Landscape buffer planting along the Site's northern boundary, supplementing TPO No. 1766: A2 group, with additional landscape buffer planting.
- The creation of a new parkland area in the northern part of the Site, to form a new defined Green Belt edge to Harpenden and ensuring Proposed Development is set back behind a large area of green infrastructure, which provides a transition out to the wider countryside.
- On establishment, tree planting associated with the landscape buffer planting outlined above would provide for strengthening of the vegetated skyline and softening of the Proposed Development and settlement edge, with other aspects of the above serving to reduce the landscape and/or visual effects.

Development of the allocation site, as illustrated in **Figure A: Landscape Capacity and Green Infrastructure Plan**, could proceed without causing long-term adverse landscape effects and without weakening the overall function or integrity of the surrounding Green Belt.



Figure A: Landscape Capacity and Green Infrastructure Plan