

Pre application Advice Report

St Albans City and District Pre Application Advice Report	Site address: Land south of Chiswell Green Lane, Chiswell Green, St Albans	Ref No: PRE/2021/0177
<p>Description of your proposal: An outline planning proposal, with all matters reserved except access, for the demolition of existing structures and construction of up to 450 dwellings (Class C3), provision of 2ha land for new 2FE primary school, open space provision and associated landscaping and new access arrangements</p>		
<p>Summary of advice (correct at the time of giving advice):</p> <ul style="list-style-type: none"> • The proposed development is classified as inappropriate development in the Green Belt for which planning permission can only be granted if very special circumstances can be demonstrated. Additional work is required to demonstrate to the Council that very special circumstances exist in this case. The applicant is advised to undertake this additional work, guided by the advice contained in the entirety of this pre-application advice. • It is considered that there is further work to do in respect of site layout, landscape / trees and SUDs approach. • Engagement with Hertfordshire County Council as Highway Authority is strongly encouraged. 		
<p>Issues you need to be aware of:</p> <p>Principle of Development</p> <ol style="list-style-type: none"> 1. The site is located within the Metropolitan Green Belt, and the proposal is classified as inappropriate development, where Policy 1 applies, stating: <i>“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 development...”</i> 2. The NPPF 2021 states: <ul style="list-style-type: none"> <i>“147. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.</i> <i>148. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the</i> 		<p>RAG rating</p> <p>RED</p>

Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.”

3. PPG Paragraph: 001 Reference ID: 64-001-20190722 states:

“What factors can be taken into account when considering the potential impact of development on the openness of the Green Belt?”

Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- the degree of activity likely to be generated, such as traffic generation”*

4. Any planning application should therefore explicitly address this test, considering:

- i. A full assessment of Green Belt harm (both definitional and other harm, - this should include an assessment of impact on openness as well as harm to Green Belt purposes);
- ii. Any other harm resulting from the proposal, which could encompass any conflicts with policy, as well as any other impacts of the proposed development;
- iii. Other considerations, which include the benefits arising from the proposed development.

5. Elements of this assessment were included in the pre application documentation, but in the absence of a fully worked up planning application, and without taking into account all material considerations, including consultation responses at the application stage, it is not possible for officers to reach a final planning judgement on the existence or otherwise of very special circumstances in this case. All of the written advice in this note is pertinent to the assessment against Policy 1 and paragraph 148 and the ultimate planning balance.

6. In relation to the “other considerations” part of Paragraph 148 NPPF, any planning application should include full details, supported by evidence as appropriate, of the benefits considered to be associated with the proposed

development. Again, it is noted that some work has been carried out in respect of this area, and this should be worked up to support any application. All material considerations in respect of the application can be considered as “other considerations” and therefore the rest of this note considers the key considerations that would be taken into account. It is not necessarily an exhaustive list.

7. It is noted that the development proposal involves the provision of land to Hertfordshire County Council for a two form entry primary school. This would be taken into account as a benefit in the overall planning balance, but it will be important to demonstrate that the site for the school is of the right size and location to meet the requirements of the Local Education Authority but also to demonstrate that it is the optimum location in terms of the layout of the development as a whole.
8. As you are aware, the SKM Green Belt Review Part 1 (2013) identified the site as part of GB25 as having a significant contribution towards safeguarding the existing settlement pattern, and a partial contribution towards preventing merging and preserving setting. Overall contributing significantly to 2 out of 5 purposes.
9. Within Part 2 (2014) the site was considered as sub area S8 (Land at Chiswell Green), with the following commentary made: *“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. At the strategic level, a reduction in the size of the parcel would not significantly compromise the overall role of the Green Belt or compromise the separation of settlements. Assessed in isolation the land makes a limited or no contribution towards all Green Belt purposes.”*
10. The site was identified in the SHLAA 2016 (references 43 a, 43 b and 44) and SHLAA 2018 (reference 561). The site was considered through the 2018 Strategic Site Selection Evaluation Outcome on Page 9, with the conclusion of the evaluation, in relation to strategic sub area SA-S8 is set out below:
11. *“An independent Green Belt Review was carried out in 2013. The site falls in parcel GB25...”*

Next Steps

Enclosed land at Chiswell Green Lane at Chiswell Green is recommended for further assessment as a strategic sub-area (SA-S8) ...

In reviewing the boundary for this site and the reasonably likely form and layout of development it is considered that the overall rating is green. There is no reason to take a different view from that set out in the Green Belt Review 2013...GREEN”

12. The site was taken forward through the withdrawn Local Plan as ‘West of Chiswell Green Broad Location’. It should be noted that the withdrawn Local Plan has no legal weight.
13. As you know, the site has been submitted via the Call for Sites process which ran from January to March 2021. The Call for Sites reference is STA-10-21 under the current HELAA process. It is being assessed for suitability, achievability and availability.

Provision of Housing

14. The proposed development is for up to 450 houses. SADC currently has a housing land supply of 2.2 years from a base date 1 April 2021. It is acknowledged that 2.2 years is substantially below the required 5 years, and as such, and in the light of recent appeal decisions, substantial or very substantial weight in favour may be applied to the delivery of housing, depending on the precise circumstances of each case. It is clear that there is no 5 year land supply and that substantial weight should be given to the delivery of housing. It is also clear that there is a need for affordable housing and substantial weight, subject to percentage being confirmed at application stage, should be given to the delivery of affordable housing. Any application should evidence how the proposal will contribute to meeting housing need within the District, particularly in respect of affordable housing.
15. In any future submission, it should be fully shown how the 450 dwellings figure has been reached, when compared to the 365 figure (60/40 resi/non-resi split and 40 dph density) calculated in the withdrawn Local Plan. For example, is the net density higher than 40dph, or is the net area larger, or a combination? Or have other factors come in to consideration?

Provision of Affordable Housing

16. The proposed development is for up to 450 houses and would provide 40% affordable housing, 25% first homes and 3% self-build plots. The Council will expect to see a policy compliant affordable housing scheme which means a minimum of 35% affordable housing as outlined in the 2004 Affordable Housing SPG which applies to the consideration of major sites in the Green Belt.

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17. GL Hearn South West Herts – Local Housing Need Assessment (LHNA) (September 2020). The table overleaf, copied from page 141 of the LHNA sets out the required need for different sized homes.

- **Recommendation: The following mix of homes size by tenure is suggested as a strategic mix across the 2020-2036 period. As there are only modest changes at a local authority level this mix can be applied across the HMA and at a local level.**

Size	Market	Affordable Homes to Buy	Affordable Homes to Rent
1-bedroom	5%	25%	30%
2-bedrooms	20%	40%	35%
3-bedrooms	45%	25%	25%
4+-bedrooms	30%	10%	10%

- The mix identified above could inform strategic policies although a flexible approach should be adopted. In applying the mix to individual development sites, regard should be had to the nature of the site and character of the area, and to up-to-date evidence of need as well as the existing mix and turnover of properties at the local level. The Councils should also monitor the mix of housing delivered.
- It will ultimately be for the Council(s) to write into policy the approach which best meets their local circumstance. This could be, for example, a desire for further downsizing or a pragmatic approach to a constrained housing supply both of which would see a greater proportion of smaller homes being built.

18. The LHNA does not recommend an affordable housing percentage, as it is up to the Council to decide upon, considering viability. The tables below set out the range of affordable housing need.

Table 37: Estimated Annual Level of Affordable/Social Rental Housing Need (2020-2036)

	Dacorum	Hertsmere	St. Albans	Three Rivers	Watford	SW Herts
Current need (divided across 16 year period)	70	71	63	45	101	350
Newly forming households	570	380	486	360	448	2,243
Existing households falling into need	353	133	197	77	163	924
Total Gross Need	993	585	745	483	712	3,517
Supply	630	228	303	133	230	1,523
Net Need	363	356	443	350	482	1,994

Source: Census/CoRe/Projection Modelling and affordability analysis

5.99 For authorities with a plan period other than 2020-2036, the current need as stated in the final column of Table 33 should be divided by the number of years in the plan period. This will impact the total gross need, but the other numbers are calculated on a per annum basis so will not change.

Table 42: Estimated Annual Need for Affordable Home Ownership (2020-2036)

	Dacorum	Hertsmere	St. Albans	Three Rivers	Watford	SW Herts
Current need	25	18	34	14	26	118
Newly forming households	410	260	512	259	303	1,743
Existing households falling into need	76	55	103	41	79	355
Total Gross Need	511	333	649	315	408	2,217
Supply	263	186	265	153	156	1,023
Net Need	248	147	385	162	252	1,194

Source: Range of data sources as described

5.143 As per the analysis for affordable homes to buy, for those authorities whose plan period differs from the 2020 to 2036 period, the current need should be divided by the number of years in the plan period being used. This will also impact the calculation of the gross and net need. All the other factors are shown on a per annum basis.

19. However, since this study was undertaken the Government has introduced First Homes.

20. First Homes is the Government's priority intermediate home ownership product and is expected to make up **25% of the total affordable housing delivery**. It came into force in July 2021. The applicant will need to bear in mind the requirement to provide First Homes and that this will be the priority intermediate housing product and take priority over shared ownership.

21. In line with the NPPG:

"There should also be a requirement, within the agreement, that the home is marketed for at least 6 months in total and that all reasonable steps have been taken to sell the property (including, where appropriate, reducing the asking price)."

Paragraph: 011 Reference ID: 70-011-20210524

22. It is considered that First Homes can make up or contribute to 10% of the overall number of homes expected to be an affordable home ownership product on major developments as set out in the NPPF paragraph 65:

"Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups."

Self Build Homes

23. The submission proposed 3% self-build plots. The LHNA states that there are currently 450 registered on part 1 of the self and custom build register (see LHNA para 8.9). As of 30th October 2021, the most up to date figure is 658. The PPG states that LPAs should use the demand data from the register in their area to understand and consider future need for custom and self-build housing in the area. Therefore the current data demonstrates that there is demand for self-build in the district which this proposal would assist in meeting. Positive weight would be attached to such provision.

24. To date 85 applications for self-build / custom build have been approved. 8 of these were approved between the periods of 31st October 2020 and 31st March 2021. These figures will be published at the end of 2021 as part of the AMR.

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Agricultural Land Classification

25. Paragraph 174 of the NPPF advises that planning decisions should contribute to and enhance the natural and local environment by recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land.
26. The site is in agricultural use and has a Grade 3 Agricultural Land Classification (ALC). An agricultural land survey and assessment should be carried out in advance of the submission of any planning permission, to establish the current grade of the land. Best and most versatile land is graded as 1 to 3a. Further information on survey requirements and site specific pre-application advice on Agricultural Land Classification can be obtained from Natural England: consultations@naturalengland.org.uk

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LVIA and Trees

27. The NPPF confirms that decisions should contribute to and enhance the natural environment by protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside.
- Landscape and visual appraisal*
28. It is understood that this is ‘a preliminary Landscape and Visual Appraisal which considers the potential of land at Chiswell Green.’ This suggests that there was the intention to carry out further assessment – however this does not appear to be clarified elsewhere.
29. It is noted that there is no methodology or reference to the accepted industry standard ‘Guidelines for Landscape and Visual Impact Assessment Third edition,’ Landscape Institute and Institute of Environmental management and Assessment (GLVIA3).’
30. Overall, the submitted Landscape & Visual Appraisal Statement (LVA) provides a detailed overview of the policy context, and the landscape and visual baseline. The proposed viewpoints appear to provide a fair representation of the areas from which there are likely to be the most significant views. It is suggested that photomontages should be provided to illustrate those views towards the settlement edge especially from the more open landscape to the west (viewpoint 10), and from the Chiswell Green Lane (viewpoint 4 or further toward the proposed access).
31. The landscape character area has been identified and the prominence of the settlement edge of Chiswell Green has

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been acknowledged. The LVA does not provide a clear methodology and judgement of visual receptor or landscape sensitivity. It does provide some narrative and assessment of the site character and visual context.

32. The LVA summary concludes that 'the residential development would assimilate well' and refers to the provision of mitigation measures including 'new woodland and hedgerow planting would help integrate...', 'substantial proposals to reinforce the vegetation framework and improve visual screening,' 'a new rational, robust and defensible GB boundary would be created along the western edge of Chiswell Green...'

33. The proposed mitigation measures are fully supported; however they are not carried forward into the landscape proposals – see comments below.

Existing trees

34. Advice is given in line with B 5837:2012 'Trees in relation to design, demolition and construction – recommendations'.

35. The submitted 'Arboricultural Constraints Summary' is not complete – it only covers the northern half of the site. The document requires updating to comprehensively address the whole site and its context.

36. The submitted PPS states that an updated Arboricultural Impact Assessment and Tree Protection Plan will be submitted in support of the full planning application. This is supported.

37. The Pre-Planning Analysis Document (PAD) Section 2.1 refers to two TPOs present within the site. It is advised that it should also acknowledge the presence of the TPOs that border the site, as identified within the submitted Arboricultural Constraints Summary (ACS) (13.1) and shown on 2.16 Constraints Diagram, as their root protection areas and any overhanging canopies will need to be taken in to account within the layout and design of the development proposals

Layout and landscape strategy

38. The NPPF confirms that decisions should 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 effective landscaping.

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39. 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.
40. A landscape led approach to the layout is strongly encouraged. With Design Advice Leaflet No. 1 'Design and Layout of New Housing' advising that *'it is crucial that sufficient space is allowed for screen planting, which shall include large trees, where new development borders the edge of existing settlements.'* On site play and open space is encouraged in line with Policy 70 of the Local Plan.
41. A recent appeal at Smallford Works (application reference 5/2019/3022, appeal reference APP/B1930/W/20/3260479), which was for an outline application in the Green Belt, is pertinent to this proposed development. The appeal decision needs to be read as a whole, but of particular note are the following paragraphs:
- 61. Whilst I do not doubt that the detailed submissions indicate the appellant has sought to demonstrate that a well-designed residential development can be achieved, even at that 'low' threshold as the appellant puts it, the quantum of development shown on the illustrative layout does not demonstrate to me that would be the case.*
- 62. For these reasons, the proposal would cause significant harm to the character and appearance of the appeal site and area. It is clear that the Government has set a high design bar and in this particular context the proposal would not result in high quality design. The proposal would therefore conflict with Policies 1, 2, 69, 70 and 74 of the LP insofar as they require development to provide adequate space within developments for landscaping, have an adequately high standard of design having regard to the scale and character of its surroundings in terms of height, size, scale and density and massing and siting creates safe, attractive spaces. Further that development should not detract from the character and setting of settlements within the Green Belt and that new development integrates with the existing landscape.*
42. This appeal decision highlights the importance of demonstrating and securing design quality in the overall planning balance, as does the October 2019 National Design Guide, which should also be taken into account.
43. The indicative layout as shown features a number of cul-de-sacs, lacking the permeability and connectivity that would help this layout function well and provide better connectivity and integration into the surrounding development. It is not clear what the reasoning for having two separate halves of the development is. There is some reference to a hierarchical road layout, but this should be more clearly demonstrated in the proposed layout.

44. The proposed road layout also raises concerns with regard to waste/recycling collections. The number of cul-de-sacs mean that collection vehicles would need to double back, with many dead end roads to negotiate. The current layout would take crews a disproportionate amount of time to collect waste/recycling from this estate. It is recommended that consideration is given to a layout which would allow a cohesive flow around the development for 26 ton collection vehicles.

45. In relation to the PAD Context Analysis Diagram 2.2 – With regards to greenspace it would be beneficial to differentiate between publicly accessible green space and private green space so that the extent and connectivity of the existing and proposed public open space network and destinations can be clearly understood.

46. PAD Context Analysis Diagram 2.2 & Constraints Diagram 2.16 – It is advised that the analysis and constraints diagrams should also show topography, the network of hedgerow and trees, any other important boundary features, and views into, within, and out of the site. With regards to views, the vision (3.1 Vision) refers to ‘providing visual green connections through the site’ however the location and extent of these is not discernible from the plan.

47. PAD Constraints Diagram 2.16 – It is advised that the houses fronting Chiswell Green Lane to the north of the site, with open views into the site, should also be identified as a sensitive frontage. How the development presents itself to Chiswell Green Lane and the existing properties along here is a key consideration.

48. Considering public open space, the submitted PAD (2.6 Site Opportunities) appears to identify opportunities for 4 key public open spaces that are ‘a central green hub,’ a ‘strategic play area,’ a space to the front of the primary school, and a space to the southern site corner. At this stage there is fundamental concern for the potentially poor character, quality, and functionality of these spaces for the following reasons.

Central Green Hub / Green Core

49. The idea of a central green space is appealing, with the PAD stating that this will be a focal space, centred around a substantial open space, which combines informal recreation and leisure features and is also visually connected to the protected existing landscaping features. However, it seems that the houses which surround this space may turn their backs on this space. Not having this central space overlooked, with the resulting poor surveillance, is unsatisfactory. Also, the possibility of building heights up to four storeys in this central area would not be appropriate, and would serve to limit the views of this central green core from elsewhere in the site and in wider views. Overall, it is recommended that the height should be limited to two storey, with limited, if any, accommodation in the roof space.

50. Furthermore, the submitted plans show this space as a large-scale SuDS attenuation feature. There is strong concern for the conflict between the proposed uses for SuDS attenuation and recreation. The basin will appear as a large, contrived, grass depression with sloping sides, and is likely to remain damp and unusable for long periods of the year. In addition any excavations in close proximity to the existing trees will need to protect the root protection area and canopy spread.

Strategic/Community Play Area

51. There is concern for the location of the strategic play area at the edge of the site, and as a key destination, it is queried how easily accessible it is from the furthest residences. In addition, the area is not positively fronted or overlooked and therefore lacks passive surveillance and security.

52. Security in general, and Secured by Design in particular, should be carefully considered when designing the layout of the site. Please see the comments of the Hertfordshire Constabulary Principal Crime Prevention Design Advisor for further comments.

Space and Community Play Area to front of Primary School

53. With regards to the space in front of the school, there is concern for the potential conflict between people and vehicles crossing the space – especially at peak flow times. The masterplan indicates the provision of a community play area, adjacent to the space, within a strip of land associated with the existing tree line. This area is not positively fronted or well-overlooked and therefore lacks passive surveillance and security. In addition, any development will need to protect the root protection area and canopy spread of the existing trees.

Southern Space

54. There is strong concern for the conflict between the proposed uses for SuDS attenuation and recreation - see comments in relation to Green Core above.

55. With regard to landscape mitigation and enhancement, the submitted PAD (2.6 Site Opportunities) and LVA (Summary 8.4) provide clear statements/principles for the delivery of ‘substantial landscape proposals’ and ‘new woodland and hedgerow planting.’ At this stage there is fundamental concern that sufficient structural landscape mitigation and enhancement planting is not being delivered within the emerging development proposals - especially along the site boundaries in this sensitive green belt location. It is acknowledged that it is proposed to enhance the existing structural vegetation with new planting, however this appears minimal and does not appear to include any new woodland planting as promoted by the PAD principles.

56. It is also recommended that improvements are made to green space provision, noting that the existing woodland in the central (eastern portion of the site) is outside the application site. It is not understood how this notable existing woodland is currently used and managed, and if this is under the applicant's control. The opportunity to include the woodland within the site boundary is encouraged in order to enable it to be placed under positive management as a valuable green infrastructure asset for the development.

57. The principle of off street 'green routes' is fully supported however further information is required to demonstrate how they will be treated and 'greened'. Typical cross sections would help communicate this.

Access

58. Access to the site will be a key consideration. Hertfordshire Highways as the Highway Authority provide their own pre-application advice service. As they would be a statutory consultee for this development you are advised to seek their advice in relation to the acceptability of the proposed new access and internal layout including fire access. Details of how to seek their advice are found here:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx#preapplication>

Amenity (of residents and neighbours), including parking

59. The amenity of existing and proposed residents will need to be fully considered as part of the detailed layout proposal at the appropriate stage. Policy 70 of the Local Plan, and Design Advice Leaflet No. 1 (Design and Layout of New Housing) will be relevant, together with Policies 39 and 40 and the Council's 'Revised Parking Policies and Standards'.

60. Whilst noted that the previous draft SLP included revised guidance some matters of layout and parking, no weight can be attached to those previous draft policies. At this stage there are no emerging policies, however paragraph 48 of the NPPF advises on the approach to be taken: Local planning authorities may give weight to relevant policies in emerging plans according to:

a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

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b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

Heritage

- 61. There are several listed buildings in the wider vicinity of the large site, including grade II Three Hammers PH, Little Danswick farmhouse, Old Cuckman’s Farmhouse. The Three Hammers PH is the listed building which is most likely to be affected by the proposed development.
- 62. With the exception of the Three Hammers PH, most of the listed buildings are in relatively rural locations. Though these are at some distance from the site, given the scale of the development site and given the range of building heights, there is the potential for the development to impact on the setting of listed buildings.
- 63. Additionally the barn at Chiswell Green Farm, though not listed, does have some heritage interest, appearing on the historic maps of 1880. It is noted that this building is scheduled for demolition.
- 64. It is recommended that any proposed development is accompanied by a suitable Heritage Statement which adequately discusses which heritage assets are likely to be affected by the proposed development, and what the impact is likely to be, including indirect impacts.

Impact on Social infrastructure

- 65. Please note a request for contributions towards leisure services would be expected. At the application stage, the precise contribution may be influenced by the number of houses and breakdown of sizes, together with the nature of on-site provision of relevant facilities such as play and open space.
- 66. Comments from Hertfordshire Growth and Infrastructure Unit, indicate that at this stage the information submitted does not contain that required to provide indicative calculations for the development. This would need to include an indicative development mix (split of flats / houses, number of bedrooms and split of market, affordable rent, shared ownership etc.) and an indicative build trajectory (subject to planning permission).

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67. In addition, we would normally expect contributions to be sought from the NHS Clinical Commissioning Group, please see attached consultation response.

Flooding and drainage

68. As the site would accommodate a major development, the Lead Local Flood Authority (LLFA) would be a statutory consultee in relation to surface water drainage for any future planning application.

69. The LLFA also provide their own pre-application service, details of which can be found here: <https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/surface-water-drainage/surface-water-drainage.aspx> The pre-application advice request form should be completed and returned to FRMConsultations@Hertfordshire.gov.uk

70. Your attention is also drawn to the developers' checklist and guidance, which is published on the HCC website and should be used as a first point of reference for information required to support a planning application. https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/surface-water-drainage/surface-water-drainage.aspx#DynamicJumpMenuManager_1_Anchor_4

Other matters

71. Land contamination: A Phase 1 Desk Top Study covering the entire site should be carried out and the accompanying report included with any application for planning permission

72. Ecology and biodiversity: No particularly significant biodiversity is known to be present and the site does not have any statutory or non-statutory designations in respect of ecology or biodiversity. To the east of the site is however an old orchard site. It is noted that further surveys of buildings on site as potential bat roosts are to be carried out during this year's main bat maternity season.

73. Archaeology: for resourcing reasons we have been unable to obtain the views of our District Archaeologist. As suggested, an updated Desk Based Assessment covering the entire site is recommended for inclusion with any planning application.

74. Crime prevention / security: Security in general, and Secured by Design in particular, should be carefully considered

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when designing the layout of the site. Please see the comments of the Hertfordshire Constabulary Principal Crime Prevention Design Advisor for further comments.

Consultation responses

75. The following consultation responses have been received and are included with this pre application advice:

- i. Hertfordshire Public Health
- ii. Affinity Water
- iii. Thames Water
- iv. Hertfordshire Constabulary
- v. NHS Herts Valleys Clinical Commissioning Group

76. The following consultation responses are still awaited and will be forwarded on receipt:

- i. St Albans Environmental and Regulatory Services
- ii. Herts County Council – Herts Ecology

Recommendations to improve your proposal:

- As set out in this note.

Information that will be required to accompany your planning application: – in addition to the mandatory needs and requirements for submission of a planning application via the Planning Portal; the list below identifies the supporting information that is considered to be a local validation requirement for your project. An application will not be validated if it is not accompanied by the required information.

- Affordable Housing Statement
- Agricultural Land Survey and Assessment
- Archaeological Desk Based Assessment

- Design and Access Statement
- Heritage Statement with Impact Assessment
- Ecological Appraisal / Assessment
- Foul Sewage and Utilities Assessment
- Landscape strategy including landscape drawings
- Landscape and Visual Impact Assessment
- Noise Impact Assessment
- Air Quality Assessment
- Tree survey and Arboricultural Impact Assessment
- Supporting Planning Statement
- Phase 1 Desk Based Assessment (Ground conditions)
- Flood Risk Assessment
- Drainage Assessment and SUDs Strategy (must consider the adjacent SPZ)
- Transport Assessment / Statement and Travel Plan (subject to views of the Highway Authority)
- Parking Strategy
- Health Impact Assessment
- Statement of Community Involvement
- Draft s106 Heads of Terms (can form an appendix to Planning Statement)
- Whilst parameter plans are not required for validation, their preparation and submission is encouraged.

Our RAG assessment prioritises issues for you:

Red: issues/policies that could result in a refusal if not addressed fully

Amber: issues/policies which require you to provide further information or clarification

Green: issues/policies that are resolved by your proposal

Important Note

An application for pre-application advice does not confirm that a development will be permitted or that planning permission will be granted. The advice given is officer advice, provided in good faith at this point in time, given the nature of the legislation existing today and based on the facts provided by you in writing in your request and at the pre-application meeting. It is therefore given without prejudice, is not binding in any way on the Council and does not form a judgement of whether any subsequent application will be approved or refused.

If you require formal confirmation that the works or development constitutes a permitted development or does not require planning permission you will need to apply for a lawful development certificate. Further information on lawful development certificates is available on the planning portal at www.planningportal.gov.uk.