24 March 2014

For the attention of: Simon Rowberry, Interim Head of Planning
Miranda Burroughes, Case Officer

Amended Application 5/2013/2589 (6 March 2014) – Objection to the Amended Application


MNRA objected to the original application registered in November 2013 and the subsequent amendment in February 2014. Copies of those comments are attached. Having considered the latest amendments we do not believe that they address the fundamental concerns raised by ourselves, other residents, or local and national organisations. Earlier submissions regarding policy, adverse effect on local infrastructure, highways, the impact on the provision of health, primary and secondary school provision, flood risk, etc. should be considered alongside this latest response.

We do not aim to repeat the points made in earlier objections as stated above. Therefore, this response focuses on the long term adverse effects on the landscape and visual characteristics of the development.

We strongly object to this latest amendment, the third of a lengthy and complex series of documentation since the application was submitted on 20 September 2013 and make the following observations:

General Context

1. This is a premature, strategic, housing development in the Metropolitan Green Belt which constitutes inappropriate development. It is presented as having “very special circumstances” to justify approval. However, deliberations with St Albans Council /Planning Department about strategic housing development on the site began long before the current proposals and in advance of an updated local plan. Oaklands College and the developers Taylor Wimpey have been actively encouraged by St Albans District Council throughout the planning process.

2. Government Policy in the guise of the National Policy Planning Framework requires green belt development to be plan led. From the outset proposed development at Oaklands has been site led, originating from the failure of the College to obtain funding of £120 million pounds for an approved Hub and Spoke Campus arrangement in 2009. The main impetus for this application had been the financial status of Oaklands Corporation and a need to obtain funding for college improvements. The net effect of recent site closures and sale of the city centre campus has been to reduce the college presence in the district. It is now uses city centre council office space to provide a focal point for student enquiries. The proposed residential scheme is regarded as no more than an
enabling financial mechanism for Oaklands College whose future viability must be in question if its survival is dependent on closures and land sales.

3. Pressure to meet housing demand from outside the district, the vagaries of the NPPF and conflicting ministerial guidance on planning policy are all contributing to enormous stress on green belt generally and St Albans in particular. Green belt sites are a much more attractive financial proposition for developers than brownfield development or urban regeneration schemes. Oaklands green belt land is subject to a toxic combination of Oaklands Corporation financial need, external planning and policy shifts and a pre-emptive move by the developers.

**Surrounding Landform**

1. The shift from agricultural land to residential would entirely reshape existing landform and lead to permanent changes to the landscape affecting visual amenity and the loss of viable, productive, agricultural land. Additional recommendations in the green belt review to extend the settlement boundaries of the site further eastward into open countryside will exacerbate the impact of the proposed urban extension. Furthermore, the enclosure of the remaining fields to the south and east shown as potential mitigating features in the review would compound the loss of openness and encourage further development.

2. The strategic nature of the application requires that it should not be considered separately from potential development on either side. Any development would be piecemeal development, which in isolation would not have any regard to its wider context in terms of the scale and character of its immediate surroundings. It would fail to provide a design and layout that takes account of adjoining land in respect of appropriate massing, scale, design and siting of buildings.

3. Recent green belt review recommendations to extend the settlement boundary of the site with potential housing development of 1650 houses extending beyond both western and eastern boundaries, dramatically increases the potential adverse effects of the proposed scheme. Greater housing numbers would effectively create a new community bordering Smallford and Marshalswick. The result would be multiple, adverse effects on the local environment, settlement and landscape character, infrastructure, local services, visual amenity and local communities.

**Landscape Characterisation and Visual Aspects – Site Classification**

National and Hertfordshire Character Zones, North Thames Basin, De Havilland Plain,

Waterman Characterisation LCZ 2 Undulating Farmland (Residential) LCZ3 (Central College Development/Hatfield Road) St Albans Urban Area, LCZ1 (Parklands)

**Residential LCZ2 Undulating Farmland**

The Environmental Statement defines the landscape character as:

"The northern part of the Oaklands site, including the proposed residential development, lies within this character zone. Agricultural uses predominate, reflecting the character of agricultural land to the north east of the Site. Buildings on the northern edge of the College campus comprising barns and sheds are also of an agricultural nature. The area is typified by medium scale irregular shaped fields bordered by hedgerows and interspersed with blocks of woodland."

Dominant landscape features within the site are categorised as medium sensitivity and identified as:

trees and woodland, garden areas, agricultural land
College Area and St Albans Urban Fringe

LCZ 3 – St. Albans Urban Area:

The area is defined by the ES as:

“This character zone comprises the residential edge of St. Albans. It is dominated by 20th Century cul-de-sac estates with regular street patterns of detached and semi-detached dwellings. Some streets have wider verges with occasional street trees and some front plots that have been paved over for car parking. It also includes educational and recreational facilities and public open spaces. The character zone extends along Hatfield Road and includes industrial and commercial estates in this area.”

ES Ch 15 LVIA 15.15 Acknowledges, “Whilst the assessment process aims to be objective and to quantify effects as far as possible it considers that subjective judgement is appropriate, if it is based upon training and experience, supported by clear evidence, reasoned argument and informed opinion. Whilst changes to a view can be factually defined, the evaluation of landscape character and visual effect does require qualitative judgements to be made”.

The methodology to characterise and define the landscape and visual impact is therefore subjective and open to interpretation.

ES Ch15 LVIA, 15.20 - States that an assessment of the nature of landscape and visual effects depends on the degree to which a development:

“Compliments, respects and fits into the existing scale, landform and pattern of the landscape context. It must also enable the enhancement, restoration or retention of the landscape character and visual amenity. Whilst taking into account the effect on strategic and important views in addition to the visual context of receptors.”

We would argue that the proposed residential development fits none of the above criteria. Moreover, attempts to define the built form of the residential area along Sandpit Lane in terms of the urban characteristics displayed by LCZ3 above are misleading and unrepresentative of the rural character of Sandpit Lane and its surrounds. Owing to the agricultural nature of this undeveloped land, the topography of this particular field, (rising substantially above Sandpit Lane) and the countryside characteristics of the land on the north eastern boundary this high density, visually intrusive, development would destroy the existing landscape character. Instead of blending into existing built form it would subsume green belt and be totally out of scale and proportion to residential properties on the north side of Sandpit Lane. This view is supported by The Landscape Partnership in a:

Review of Landscape and Visual Aspects: Applicant’s Environmental Statement Addendum commissioned by St Albans District Council:

“Overview and Conclusion

4.1 There are a number of outstanding concerns in the way the landscape and visual assessment was undertaken and the judgements made regarding the effects of the proposed development. These judgements predominantly underestimate the expected effects.

4.3 Whilst some changes have been made to the residential development proposals, the scheme will still exert significant harm to the landscape character and local views of the area. The effects are compounded by the density of housing and the rising topography of the site. This would harm both the character and appearance of the landscape within the Green Belt and the landscape surrounding the settlement of St Albans. The applicant has also not referred to how the development proposals relate to the objectives of the Watling Chase Community Forest, which may form a material consideration in the determination of this planning application.
4.4 Overall, there is clear and evident harm that would arise from the effects to the landscape and views within the local area. On this basis, there is a good case for recommending refusal on landscape grounds.”

Minor amendments to the landscape proposals for the residential site fail to address the significant long term adverse effect on the overall character and visual impact of the landscape and the magnitude of change to land which is designated Metropolitan Green Belt and part of Watling Chase Community Forest.

The diagram below reproduced from the Natural England website provides an objective assessment of the agricultural characteristics of the site:

**Significance Criteria** (Ch 15 LVIA Environmental Statement) It is asserted that the effects on landscape character and visual aspects are determined through assessment of:

- The sensitivity of the affected landscape;
- The sensitivity of the visual receptor;
- The magnitude of the potential change that will occur.

In the following table MNRA have focused on Waterman’s definitions of sensitivity, magnitude and stated effect on receptors closest to the residential development. *(Appendix C Consolidated Amendments to ES Chapter 15: Landscape and Visual Impact)* (For clarity MNRA have referred back to Ch 15 LVIA and inserted unchanged significance effects into the table)

The Landscape Partnerships comments on the Methodology adopted in the ES are as follows: “Some amendments have been made to deal with inconsistencies within the original methodology, with a redefined summary of landscape and visual effects. Whilst this is a helpful amendment, there remains a relatively poor correlation when combining descriptive terminology for magnitude and sensitivity within the Significance Matrices of the ES, to the descriptions used in the redefined summary.”
### MNRA Table 1 Significance of Effects Based on Appendix C Consolidated Amendments to Ch 15 MNRA:

**Comment**

<table>
<thead>
<tr>
<th>Viewpoint Location</th>
<th>Significance of Effects:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Residual landscape and visual effects:</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Substantial Adverse:</strong> The Development would cause substantial, permanent loss or alteration to many key elements of the landscape. This includes the introduction of elements that are at complete variance to the landscape. The Development would be visually intrusive and would cause a substantial deterioration in the view.</td>
<td>Year 1 Visual Receptors&lt;br&gt;Users of the playing fields: <strong>Permanent, long-term, local, minor adverse.</strong></td>
</tr>
<tr>
<td><strong>Major Adverse:</strong> The Development would cause substantial permanent loss or alteration to one or more key elements of the landscape. This includes the introduction of elements that are prominent and uncharacteristic of the landscape. The Development would be clearly visible and would cause a noticeable deterioration in the view.</td>
<td>Year 15 Visual Receptors&lt;br&gt;Users of the playing fields: <strong>Permanent, long-term, local, negligible.</strong></td>
</tr>
<tr>
<td><strong>Moderate Adverse:</strong> The Development would cause considerable permanent loss or alteration to one or more elements of the landscape. This includes the introduction of elements that are prominent but may not be substantially uncharacteristic of the landscape. The Development would be clearly visible and would cause a noticeable deterioration in the view.</td>
<td>Sensitivity Medium</td>
</tr>
<tr>
<td><strong>Minor Adverse:</strong> The Development would cause minor permanent and / or temporary loss or alteration to one or more elements of the landscape. This includes the introduction of elements, which may not be uncharacteristic of the existing landscape. The Development would be perceptible in the view and would cause a minor deterioration in the view.</td>
<td></td>
</tr>
<tr>
<td><strong>Negligible:</strong> The Development would cause very limited changes to the landscape and / or views, but creates no significantly discernible effects.</td>
<td></td>
</tr>
<tr>
<td><strong>No effect:</strong> There would be no effect as a result of the Development on either the landscape character or the visual amenity of the built environment.</td>
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### Year 1 Visual Receptors

- **Residents and visitors in nearby residential properties and pedestrians:** **Permanent, long-term, local, moderate adverse.**
- **Local road users:** **Permanent, long-term, local, minor adverse.**
- **Residents and visitors in nearby residential properties and pedestrians:** **Permanent, long-term, local, negligible.**
- **Road users:** **Permanent, long-term, local, negligible.**
- **Sensitivity:** **High**

### Year 15 Visual Receptors

- **Residents and visitors in nearby residential properties and pedestrians:** **Permanent, long-term, local, minor adverse.**
- **Local road users:** **Permanent, long-term, local, minor adverse.**
- **Residents and visitors in nearby residential properties and pedestrians:** **Permanent, long-term, local, negligible.**
- **Road users:** **Permanent, long-term, local, negligible.**
- **Sensitivity:** **High**

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**Table 1: Potential Visual Effects in Relation to Representative Views – Completed Development:**

<table>
<thead>
<tr>
<th>Viewpoint Location</th>
<th>Significance of Effects:</th>
</tr>
</thead>
<tbody>
<tr>
<td>13. Fields adjacent to the View from Playing western Site boundary looking east.</td>
<td></td>
</tr>
<tr>
<td>Magnitude of change Year 1: <strong>Medium</strong> to <strong>High</strong></td>
<td></td>
</tr>
<tr>
<td>Magnitude of change Year 15: <strong>Low</strong></td>
<td></td>
</tr>
</tbody>
</table>
| "Recommended changes in the green belt review for housing on this field would significantly alter the magnitude of change and the significance of effects/ impact of development."
| |
| 14. View from Sandpit Lane looking south east. | |
| Magnitude of change Year 1: **Medium** |
| Magnitude of change Year 15: **Low** |
| "We would argue that the magnitude of change should be high because of the change from undeveloped agricultural land to residential high density urban development."
| |
| 15. View from Barnfield Road close to Ardens Way looking south. | |
| Magnitude of change Year 1: **Medium** to **High** |
| Magnitude of change Year 15: **Low** |
| "It is residents’ view that the residual landscape and visual effects should be either a **Substantial** or **Major Adverse** because of the high magnitude of change/ high sensitivity."
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| **Recommended changes in the green belt review for housing on this field would significantly alter the magnitude of change and the significance of effects/ impact of development.** | |
| **See Left for descriptions of effects.** | |

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| **We view this as a **Major Adverse** because of the high magnitude of change/high sensitivity** | |
In their response to the Landscape Partnership Review comments on the methodology adopted to assess the significance of effects (ES Addendum Appendix B) Waterman stated:

“The assessment process aims to be objective and to quantify effects as far as possible. However, it is recognised that subjective judgement is appropriate, if it is based upon training and experience, supported by clear evidence, reasoned argument and informed opinion. Whilst changes to a view can be factually defined, the evaluation of landscape character and visual effect does require qualitative judgements to be made. The conclusions of this assessment therefore combine systematic observation and measurement with informed professional interpretation.”

With regard to an assessment of the effects at the higher end of the significance scale the response acknowledged the following:

However, it is agreed that those effects at the higher end of the significance scale are likely to be of the greatest importance in assessing the impacts of a development proposal.”

The Environment Statement is produced on behalf of the applicant and is clearly designed to emphasise facts and features which lend themselves to a favourable outcome in terms of potential site development. It is also acknowledged that the evaluation of the landscape is a qualitative judgement and therefore a matter of interpretation rather than fact.

**Watling Chase Community Forest**

**Appendix C Consolidated Schedule of Amendments to ES Chapter 15, Landscape and Visual Impacts 1.1**

Although the above acknowledges a policy context to the community forest within St Albans i.e. saved policy 143A it fails to show how the development would contribute under Policy 51 of the Hertfordshire Structure Plan which supports the objectives of the WCCF plan for the purposes of landscape improvement, recreation, nature conservation, forestry and farming. Relevant local plans should show the boundary of WCCF on proposals maps, and take the approved WCCF Forest Plan into account in the formulation of policies and proposals for development and the use of land in the Forest area.”

Appendix C now includes an updated map showing that all Oaklands College land is designated as part of the Watling Chase Community Forest area including proposed green belt boundary changes. The NPPF states in Para 92 that, “Community Forests offer valuable opportunities for improving the environment around towns, by upgrading the landscape and providing for recreation and wildlife. An approved Community Forest plan may be a material consideration in preparing development plans and in deciding planning applications. Any development proposals within Community Forests in the Green Belt should be subject to the normal policies controlling development in Green Belts.”

Whilst the application has attempted to downplay the significance of the harm to the character of the landscape, visual amenity, and magnitude of change, through claims that the affects will only be perceived at a localised level, it is evident that the development will have a much broader impact on the landscape and environment.

**Residential Site Design and Access**

Whilst giving conditional approval the design and conservation department of SACDC has also noted the following drawbacks in the design and access of the residential proposal.

““The character areas, as defined in the D&A, have not been carried through particularly well. The same house types are found throughout the different character areas, thus losing the different scales that are implied in the D&A. Similarly, the same palette of materials is used throughout the different character areas, although there are differing elevation and fenestration treatments for houses which are specific to the different character areas. The character areas are not as cohesive as they might be.”

“Viability considerations have dictated the number and density of houses on this site. This is not suburban development as such.”
“It is the topography of the site, which serves to be one of the most significant factors as to whether this scheme will create a pleasant place to live. There are some marked differences in levels within the site, and it is not easy to accommodate the necessary privacy between these tightly grained houses without creating overbearing relationships. Most of the level changes occur within the back-to-back relationship rather than across streets. There are gardens within the scheme, which will be bounded by retaining walls with fences on top, in the worst case these may be 3 metre high boundary treatments.

Whilst some of these level changes can add interest, I am not convinced that the layout has taken the complexities of the level changes into account in every circumstance. It should also be noted that the tallest proposed building – the three-storey apartment block – is located in one of the highest parts of the site on the edge of the development.

This is a difficult site, and the density that is required to achieve a viable development sets parameters and constraints that make it hard to achieve a scheme of outstanding quality.”

The layout and design of the site is in direct conflict with surrounding landscape characteristics. It lacks sympathy or coherence with the built environment to the north of Sandpit Lane or with the open countryside to the north east. The design, scale and magnitude of the proposed site is determined by economic viability for the applicant and developers with scant regard to the impact on local communities or infrastructure.

The high density and undulating levels of the site will create issues of privacy for new residents and existing residents directly opposite the site. Amended Viewpoint 13 Appendix F clearly shows the extent to which the development will affect landscape quality and visual amenity. Siting a block of flats on the highest point adds insult to injury.

The emphasis on the development having a purely local effect is misleading. It will permanently and adversely affect the nature and character of the landscape. Meanwhile the local residential area will endure multiple adverse effects on local services and infrastructure. The phased nature of the development over a 5 year period will mean maximum disturbance, disruption and deterioration in the quality of life for existing and new residents.

Conclusion

As stated at the beginning of the objection on this occasion MNRA has focused on a particular aspect of the amended application, the effects on the character of the landscape and visual impact of the enabling residential development. Other consequences of the development such as the impact on local infrastructure, highways, local services, education, drainage and flood risk, have all been previously documented and we remain totally opposed to this development with regard to those issues as well.

The extensive documentation fails to demonstrate that the potential harm to the green belt, landscape character, visual or other adverse effects of the enabling development, would be outweighed by the benefits of the college redevelopment. Furthermore, the methodology of the environmental assessment is qualitative and the judgements expressed about the significance of the effects on the landscape underestimate the impact of this development. The strategic nature of the Oakland site as part of the Watling Chase Community Forest, its proximity to a landscape development area, and an area which helps maintain a clear separation between St Albans, Hatfield and Welwyn is conveniently ignored.

Gaynor Clarke
Secretary Marshalswick North Residents Association