



31<sup>st</sup> October 2025  
Our Ref: OJ/18.260

Robert Brigden Esq  
St Albans City and District Council  
Civic Centre  
St Peter's Street  
St Albans  
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Dear Mr Brigden

## **WOOLLAM PARK**

The applicants – Hallam Land, St Albans School and St Albans School Woollam Trust - submitted an outline planning application that was registered on the 26th February 2025.

Since that time various consultees and other interested persons have submitted comments in respect of the proposed development that the applicant has considered.

We met on Monday 22nd September 2025 to discuss those comments and proposed amendments to the scheme. We have reflected on that meeting and where necessary have made further modifications.

The following explains the amendments the application is making to its application.

### **Parameters Plans**

The proposed development is founded on a series of parameter plans. Because of changes to the surface water drainage strategy (described below) slight adjustments to the certain of the parameter plans are necessary. Accordingly, we are amending the following drawings:

DE\_565\_73 revision E - Access & Movement Parameter Plan

DE\_565\_74 revision E - Green & Blue Infrastructure Parameter Plan

Notable, neither the Land Use Parameter Plan (DE\_565\_72 Rev D) or the Building Heights Plan (DE\_565\_075 Rev D) do not require amendment.

The above revision includes an additional pedestrian and cycle link in Parcel D as discussed at the above meeting to increase accessibility.

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## **Surface Water Drainage**

The applicants have undertaken further hydraulic modelling to determine the extent of surface water flow paths within the site including the post development scenario (i.e., with the development in place). This is germane to the consultation response from the Local Lead Flood Authority.

In March 2025 revised flood maps were issued by the Government, which have been taken into account. Comments from Network Rail regarding the proximity of the railway embankment have also been taken into account. Previous infiltration testing 2018 and 2024 has also been repeated as a precautionary measure.

The rainfall model has determined the extent and depth of overland flow in storm events. This has been employed to confirm the location of attenuation and detention features and to re-size where appropriate to control infiltration to the ground. The practical effect of this is that overland flow currently experienced is addressed.

The output from this is a revision to surface water drainage scheme - drawing 05920 WR 0525 P11.

Notably, in the context of paragraph 175 of the NPPF (as supplemented by revisions to the NPPG in September 2025), the applicants' revised Flood Risk Assessment demonstrates clearly the proposed layout, design and mitigation measures would ensure that occupiers and users would remain safe from current and future surface water flood risk for the lifetime of the development, without increasing flood risk elsewhere. The requirement to undertake a sequential test has therefore fallen away.

PJA have prepared a response to the comments from the Local Lead Flood Authority which accompanies this letter.

## **Illustrative Framework Plan and Landscape Framework Plan**

The changes to the drainage strategy described above has in turn resulted in slight revisions to both the Illustrative Framework Plan and Illustrative Landscape Plan. Whilst these are not plans for which approval is sought, for consistency we have also revised DE\_565\_104 revision C - Illustrative Framework Masterplan and DE\_565\_102 revision C Landscape Framework Plan.

## **Biodiversity Net Gain**

Similarly, we have revised the habitat creation plan and re-run the biodiversity net gain metric. The revised plan and spreadsheet accompany this letter. This continues to achieve a net gain greater than the mandatory minimum 10%.

## **Longspring Woods Local Wildlife Site**

The applicant has proposed management principles for the management of Longspring Wood LWS as requested by the County Council's Ecologist. A planning condition is sought referencing these principles as the basis for such a Plan.

## **Areas of open space**

To account for the above, there has been a slight adjustment to the areas of open space within the site, which is shown on the amended open space plan DE\_565\_101 Rev C.

It remains the case that the proposed development exceeds that draft Local Plan Standards for various typologies (amenity green space 148%, natural and semi-natural green space 113%, parks and gardens 171%, children's play 125%, teenage areas 114%).

There remains a shortfall in allotments for the reasons given previously<sup>1</sup> albeit there remains alternative productive landscape opportunities in the form of community grow zones and community orchards.

No additional playing fields are proposed (other than the replacement pitches at Longcroft). The justification for this is set out in the accompanying note. This ability to provide off-site improvements is permissible in Policy B1 of the emerging Local Plan.

### **Urban Design Comments**

The LPA has retained specialist advice in relation to masterplanning and urban design matters; Mr Gary Colligan of Think Place. Mr Colligan's comments on the application were provided on the 23rd April 2025. Part 1 of the accompanying document entitled '*Responses to urban design / landscape comments*' addresses relevant points and provides supplementary information. Where appropriate, those comments have been taken into account and reflected in the amendments to the proposed development. We discussed this at our meeting on the 22nd September 2025 and have also accommodated the addition pedestrian and cycle connection sought in the southernmost development area. We also agreed that any residual matters are most appropriately addressed through a Design Code that will be secured via planning condition. We understand that Mr Colligan is now content with the level of information provided and the details proposed for an outline application.

### **Landscape Comments**

The LPA has also been provided with assistance from Mr Adam Rumble of the County Council in respect of landscape matters. Mr Rumble provided comments on the application dated 5th June 2025. Again, Part 2 of the accompanying document entitled '*Responses to urban design / landscape comments*' addresses relevant points and provides supplementary information. Where appropriate, those comments have been taken into account and reflected in the amendments to the proposed development. At the time of writing we have not received any further comments from Mr Rumble.

Of particular note is the comment in relation to landscape details associated with the Harpenden Road access. You and I have discussed this point and agree that such details can be provided at the reserved matters stage and are not required for the determination of this outline application. We have nevertheless included in sketch form soft landscaping measures for this junction comprising a combination of new tree planting and verge planting. We have provided similar details for proposed turning loop at Sandridgebury Lane.

As is commonplace, a planning condition can be employed to specify the details that should form part of such reserved matters applications in due course.

### **The playing field scheme**

You will be aware from our conversations that slight adjustments to the playing fields scheme and the pavilion are proposed in response to comments from Sport England. These comprise a change in the primary elevation of the pavilion, additional detailed relating to landscaping, means of enclosure and ball strike mitigation. We have slightly adjusted the car parking to increase the provision of cycle parking. Finally, we have amended the drainage strategy by removing the retaining wall of the infiltration basin and replacing this with 1:3 side slope. These changes are shown on the following drawings.

DE\_5655\_012 Rev F Planning Proposal Sports Pavillion Annex  
DE\_565\_013 Rev D Proposed Floor Plan and Roof Plan  
DE-565-81 Rev F Site Layout Plan  
DE\_565\_82 Rev G Proposed Fencing and Enclosure Plan  
DE\_565\_103 Rev C Advanced Planting Specification Sheet 1 of 2

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<sup>1</sup> *Design and Access Statement, page 14*

In addition, we have prepared the following further technical specifications for which approval is sought.

TGMS1284.4-1 – Proposed and Existing Levels – Rev 2  
TGMS1284.4-2 – Formation Level Isopachytes – Rev 1  
TGMS1284.4-3 – Drainage Design – Rev 3  
TGMS1284.4-4 – Usable Playing Field Area – Rev 2  
TGMS1284.4-5 – Setting Out – Rev 2

TGMS1284.4 – Natural Turf Specification Design & Construction Considerations – Rev 0  
TGMS1284.4 – Non-Turf Cricket Pitch Specification Addendum – Rev 1  
TGMS1284.4 – Specification for Construction of Natural Turf Playing Field – Rev 2  
TGMS1284.4 – 5 Year Maintenance Programme – Rev 2

So that there is a complete suite, I also attached the following which for the avoidance of doubt have not been altered:

Work Schedules – Woollams Playing Field Natural Turf Work Schedules

The purpose of providing this level of detail at this stage is to enable compliance-based conditions rather than pre-commencement conditions that would otherwise require such information to be approved at a later date. I suggest we start to formulate these conditions, noting that Sport England have proposed a series of predetermination condition already

### **Design and Access Statement**

In order to provide a comprehensive account of the proposed development, the Design and Access Statement will be revised to incorporate as necessary the revised drawn material and any consequential textual changes. We have not done this as yet as we are keen to ensure that what is ultimately submitted is the final version, but that should not prevent anyone considering the original document alongside the additional material submitted at this stage.

### **Archaeology**

The County Archaeologist commented on the application on the 18<sup>th</sup> March 2025 and proposed that planning conditions be applied that would require a programme of archaeological trial trenching in accordance with an approved written scheme of investigation (WSI). Orion Heritage has prepared such a scheme which has been agreed by the County Archaeologist (prior to his recent retirement). We are submitting this at the present time to enable a compliance-based planning condition that does not require any prior approval of the WSI.

You will be aware that trial trenching has been undertaken at Longcroft pursuant to that approved scheme. We are also providing the evaluation report associated with that work.

### **National Planning Policy Framework**

The applicants are mindful that the Government issued its revision to the National Planning Policy Framework on the 12<sup>th</sup> December 2024. This makes material changes to a number of policy areas that are germane to the determination of this application; the decision maker will need to have regard to these in due course. The applicants undertook to address the substance of this and provide a schedule of references to be read alongside the application material; its approach in respect of this is explained in the accompanying Note.

### **Environmental Statement**

The Environmental Statement (ES) submitted as part of the planning application is founded on the parameter plans, the access drawings, and, for the playing pitches, the detailed drawings associated with

that part of the proposed development. Whilst the changes to the proposed development are limited, the EIA team have considered whether the conclusions of the ES remain valid. A Supplementary ES has been produced accordingly. Notably the changes do not result in different or new environmental effects to those reported previously.

### **Cumulative Effects**

We are aware that Cala Homes has secured reserved matters approval for 123 new homes on the land known as **Sewell Park**. The ES and other documents had regard to the likely development of Sewell Park reflecting the fact it benefited from outline planning permission for up to 150 new homes. On the basis that the reserved matters approval is within the ambit of the outline permission, there are no new or different cumulative impact arising from that more recent approval to those assessed already, noting it is for a lesser scale of development in any event.

You have also asked that we consider the likely cumulative effects of two **planning applications submitted at Sandridge**. I do not make any comment on the merits of those applications, but I observe that neither is identified for development in the made Neighbourhood Plan or the emerging Local Plan. These two sites are 1.5km and 2kms from the Application site (crow fly distance) and are on the eastern side of the railway line. In many instances the receiving environment which could be significantly affected by the respective development proposals are different, but the Supplementary ES considers various relevant effects.

I trust this provides you a full appreciation of what has been submitted, but as always, should you have any queries, please do not hesitate to contact me.

Yours sincerely,



**Owen Jones**  
Director