



**Land East of the A10, Buntingford,
Hertfordshire**

Urban Design Proof of Evidence

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Prepared on behalf of:

**Countryside Partnerships Ltd and Wattsdown
Developments Ltd**

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APPENDICES (SEE SEPARATE A3 DOCUMENT)

- A Planning Practice Guidance Extract – Making effective use of land
- B Site and Contextual Density Analysis
- C Appeal Scheme Character Guidance

1. INTRODUCTION

1.1. PERSONAL BACKGROUND

- 1.1.1. My name is Andrew Williams. I am a qualified Urban Designer, Chartered Landscape Architect and a founding Director of Define; a Town Planning, Urban Design and Landscape Architecture practice.
- 1.1.2. Since gaining my first degree and post graduate diploma in Landscape Architecture from the University of Central England in 1996 I have worked as a landscape architect for Lovejoy in Birmingham becoming Design Director in 2005. I gained a postgraduate diploma (distinction) in Urban Design from Oxford Brookes University in early 2005. I was appointed Managing Director of Capita Lovejoy's Birmingham Office in 2008. In March of 2011 I, along with my colleague Mark Rose, founded Define, which has since grown to over 30 professional staff (including town planners, urban designers, landscape architects and architects).
- 1.1.3. All my professional work as a landscape architect and urban designer has been at the interface between development and its context, often in locations that are sensitive due to their landscape, townscape and visual qualities.
- 1.1.4. Current projects I am involved in include being the lead masterplanner /urban designer / landscape architect for Garden Cities (such as Ebbsfleet Eastern Quarry), Garden Towns (such as Worcestershire Parkway), Garden Villages (numerous) and Garden Suburbs (such as Broadnook Garden Suburb). I also act for local planning authorities in the role of establishing, guiding and managing the masterplanning process for new garden communities (such as Whetstone Pastures Garden Village on behalf of Blaby DC).
- 1.1.5. I also regularly act for private developers, institutions, landowners and public authorities in respect of smaller sites (less than 1000 dwellings), where urban design, townscape and also landscape and visual considerations are critical to shaping change in a way that is inspired by, and assimilates successfully with, its context.
- 1.1.6. I have carried out masterplanning, urban design, townscape and landscape audits for more than 200 schemes, either during their determination or following refusal, and have given evidence at over 100 planning appeals, the great majority in the role of external auditor.
- 1.1.7. I was instructed in April 2024 to review the appeal scheme in respect of the claimed urban design and density related harm, having particular regard to the third reason for refusal. I

reviewed the application prior to accepting this commission and have visited the site and walked the surrounding area as part of this process.

- 1.1.8. My evidence therefore specifically addresses the second main reason as set out in the Case Management Conference (the third reason for refusal), in assessing the maximum density of the appeal scheme and its context to understand if the scheme's density (at its maximum level) would give rise to harm to the character and appearance of the area and to consider what design control mechanisms would affect this judgement. I also consider how the density of the proposal relates to the transition between the settlement boundary and countryside beyond.
- 1.1.9. Mr Jon Etchells separately considers in evidence the effects on the landscape and visual character of the wider area, the landscape and rural character of the site, and the transition between the settlement and the countryside beyond (in character terms).
- 1.1.10. This proof of evidence is structured as follows:
- **Section 2** analyses the third reason for refusal insofar as it relates to urban design matters.
 - **Section 3** analyses the subject of density, considering national and local planning policies and guidance, measures both the appeal scheme and context in regard to its gross and net density, compares the findings of this exercise and concludes with judging whether the density applied for is appropriate.
 - **Section 4** considers the character and appearance guidance available at this outline stage, and how this would typically evolve through the reserved matters process.
 - **Section 5** considers the findings of section 3 and 4 of my evidence against the relevant national and local planning policies.
 - **Section 6** provides my Conclusion of my evidence and acts as a (1350 word) Summary Proof of Evidence
 - Separate A3 Appendices include **Appendix A**, which includes relevant extracts of Planning Practice Guidance relating to density, **Appendix B** provides a detailed density analysis of the site's context with a focus on recent and neighbouring residential parcels, and **Appendix C**, that expands on guidance provided within the DAS to illustrate how the appeal scheme is intended to be developed in character terms.

- 1.1.11. Evidence is provided separately in respect of matters pertaining to locational sustainability (Mehmet Ahmet), Landscape and Visual (Jon Etchells), Housing supply (Roland Bolton) and Planning (Hannah Albans).
- 1.1.12. Finally, this proof of evidence is true and has been prepared and is given in accordance with The Landscape Institute Code of Conduct. I confirm that the opinions expressed are my true and professional opinions.

2. REASON FOR REFUSAL NO. 3

2.1. INTRODUCTION

2.1.1. The third reason for refusal, as summarised within the 2nd Main Issue as set out by the Inspector at the Case Management Conference) is essentially the claim of harm to the character and appearance of the area due to the proposed maximum density of the application.

2.2. ANALYSIS

2.2.1. The third reason for refusal states the following:

3. It has not been demonstrated that the application site can accommodate the maximum quantum of development outlined within the submitted parameter plans. The proposal at the maximum level outlined within these plans would create a dense and urban appearance which does not respect the site's rural character or its landscape character and fails to transition between the urban settlement boundary and the countryside beyond. The proposal would fall contrary to policies DES2, DES3, DES4, GBR2 or HOU2 of the East Herts District Plan (2018), policies ES1, HD1, HD2 and HD4 of the Buntingford Community Area Neighbourhood Plan, and guidance in the National Planning Policy Framework.

2.2.2. As such, this reason for refusal claims:

1. It has not been demonstrated that the application can accommodate successfully the maximum amount applied for.
2. At the maximum quantum, the application would create a dense and urban appearance.
3. This appearance (at its maximum quantum) would not respect the site's rural or landscape character and fails to provide an acceptable transition between the urban settlement and the countryside beyond (the site) thereby conflicting with various planning policies.

2.2.3. In direct response to these claims, my evidence assesses:

1. When considering Planning Practice Guidance regarding making effective use of land, how does the proposed development density relate to its context, and as a matter of

fact how different would the appeal scheme be using appropriate density measurements (see Section 3).

2. Considering the 'up to' description of development, and the qualitative character requirements of an outline application, whether this would give rise to a dense and urban appearance and how the character that is being promoted would relate to its context, considering the appropriate design control mechanisms that function at Reserved Matters stages (see Section 4).

- 2.2.4. The final aspect of RfR3 (as per para 2.2.2 above) is being directly addressed by Mr Jon Etchells, where he considers the extent to which the development (at its maximum density) would respect the site's landscape and rural character and influence the transition (in character and visual terms) between the settlement and the countryside beyond.

2.3. CONCLUSION

- 2.3.1. The third reason for refusal claims that it has not been demonstrated that the application site can accommodate the maximum quantum of development applied for. It goes on to claim that (only) at the maximum level applied for, a dense and urban appearance would be created. This appearance would not respect the rural and landscape character of the site and would fail to enable a transition between the urban settlement boundary and the countryside beyond.

3. ANALYSING DENSITY

3.1. INTRODUCTION

3.1.1. My evidence largely focuses on the maximum proposed density of development applied for, and how this relates to comparable parts of its context. To ensure my evidence is robust I have followed a structured approach to assessing density based on national policy.

3.1.2. I summarise below the national and local policies and guidance that relates to density, how density should be measured for this exercise, compare the appeal scheme density (at its maximum) with parts of its context that are of a comparable scale and have planning application material available to verify measurements, and answer the question “what is an appropriate density for the site?”.

3.2. NATIONAL POLICY AND GUIDANCE

National Planning Policy Framework (NPPF) – December 2023 CD5.1

3.2.1. The NPPF addresses the effective use of land at section 11, with ‘achieving appropriate densities’ placed at paragraphs 128 to 130.

3.2.2. This section highlights (at 128) that policies and decisions should support the efficient use of land taking a variety of factors into account, including the need for different housing types, local need, infrastructure and services, local character and well-designed places.

3.2.3. Paragraph 129 goes on to highlight the tolls that can assist, and stresses that policies and decisions should avoid homes being built at low densities. It suggests this should be enshrined in local policy with minimum densities set out by local authorities and applications refused where they do not make effective use of land.

3.2.4. Paragraph 130 applies only to existing urban areas and identifies that where significant uplifts in average density may be inappropriate if it leads to built form being wholly out of character with the existing area.

3.2.5. Section 12 of the NPPF also considers this subject at paragraph 135 c) and e) to ensure that development is sympathetic to local character, while not preventing or discouraging innovation or change (such as increasing densities) whilst also optimising the potential of a site to sustain an appropriate amount and mix of development.

National Design Guide (NDG) – January 2021 CD20.11

3.2.6. The NDG addresses density in several locations. It states at paragraph 59 that where scale or density is very different to existing, a new identity might be more appropriate. Paragraph 65 states that well designed development optimizes density, at 66 that density should respond positively to its context. Paragraph 81 refers to higher densities being reliant on access to public transport.

Planning Practice Guidance (PPG) – July 2019 CD5.2

3.2.7. The PPG supports section 11 of the NPPF by explaining in greater detail 1. What tools are available to local planning authorities to help identify appropriate densities and 2. How can density be measured for planning purposes. I append these extracts of the PPG with highlights at my Appendix A.

3.2.8. The tools available include accessibility measures, characterization studies, environment and infrastructure assessments and assessments of market or viability. In respect of measuring density, 3 methods are identified with different emphasis, as follows:

3.2.9. Plot ratio measures help to indicate how a development will relate to its context, and the provision of open space by indicating the ratio of building cover to other uses. This method uses a simple measurement of building footprint set as a ratio to a given area and is a reasonably straightforward calculation but is verified where the measurements can be verified by planning application layout drawings.

3.2.10. Bedspaces per hectare indicates the density of potential residential occupation but is often very difficult to obtain accurate information for areas that have been built for a reasonable time.

3.2.11. Dwellings per hectare measures the number of homes within a given area. It is my experience that relying on this form of measurement only can lead to inaccurate assumptions regarding density, as it cannot consider the different sizes of the respective houses. This variable can lead to notably inaccurate conclusions when comparing modern development (with affordable provision that typically provides for starter homes and smaller properties to a greater degree) when compared with more historic building forms that can often have a much larger average house size.

3.2.12. In this regard, the PPG goes on to state:

Dwellings per hectare, used in isolation, can encourage particular building forms over others, in ways that may not fully address the range of local housing needs. For example, an apartment building containing one person studios could deliver significantly more dwellings per hectare, but significantly fewer bedspaces per hectare, than a terrace of

family-sized townhouses on a similarly sized site. It is therefore important to consider how housing needs, local character and appropriate building forms relate to the density measures being used.

3.3. LOCAL POLICY AND GUIDANCE

District Plan (DP) – October 2018 CD4.1

- 3.3.1. I consider below only the planning policies referred to in reason for refusal 3.
- 3.3.2. The District Plan addresses Housing Density at 14.3 on its page 180 culminating in policy HOU2. It clarifies that it refers to density based on dwellings per hectare (and in that respect it is not fully aligned with guidance within the PPG, although the DP pre-dated this guidance). It refers to higher and lower density but does not clarify what these terms relate to in density terms. It refers to higher density being usually associated with flats and taller buildings but makes no mention of how housing mix can affect densities.
- 3.3.3. Policy HOU2 sets out that housing development should make efficient use of land and that proposals are required to demonstrate how the density of new development is informed by local character and contributes to other policy design objectives, improving housing mix and providing adequate public open space. It goes on to say that density will vary with location – higher density on town centre sites, medium density in peripheral locations of settlements, and lower density applicable to villages. Without setting out what these densities terms mean, either specifically or via a range, the policy cannot be interpreted too literally.
- 3.3.4. Policy DES2, DES3 and GBR2 relates to landscape related aspects and are not considered further in my evidence.
- 3.3.5. Policy DES4 relates to the Design of Development and confirms that proposals will be expected to make the best possible use of the available land, considering a variety of factors relating to the character of the site and surrounding area. The written justification of this policy identifies the need (of major developments) to include a variety in density to reflect different parts of the site, with higher densities along major internal routes, at gateways and around local centres, with lower densities elsewhere.

Buntingford Neighbourhood Plan (NP) CD4.3

- 3.3.6. I consider below only the planning policies referred to in reason for refusal 3.
- 3.3.7. Policy ES1 refers to the Rib Valley (to the north and centre of Buntingford) and is a landscape related matter and is not considered further (the same is true of HD2). HD1 refers to

development within and beyond the settlement boundary and is not relevant to density or character. HD4 refers to the need to create sufficient space around dwellings to respect the rural/semi-rural context, with cross reference to Appendix 4 – Design Code.

3.3.8. The Design Code as set out at Appendix 4 provides guidance as to building separation – which for 2 storey is 23 metres with an extra metre separation for every half metre of finished floor level difference. It also requires minimum standards of garden area. Both of these matters have a relationship with density but is not so onerous that it will have a notable effect on delivering density and is principally a matter to be considered at reserved matters stages.

3.4. MEASURING DENSITY – APPROACH AND METHODOLOGY

3.4.1. I set out at my Appendix B a detailed assessment of the appeal site’s maximum density in combination with several housing parcels within Buntingford to enable a comparison. I set out a summary of findings below, but first explain the approach and methodology.

3.4.2. Firstly, considering the position of the PPG in respect of measuring density, and given my own experience of this subject, I have identified the need to measure both the amount of homes per hectare (dwellings per hectare) but due to how misleading this method can be when comparing different housing mixes, I have also carried out a plot ratio assessment – which provides a more appropriate comparable measurement of density across different parcels. Whilst the PPG identifies this as a gross development area calculation including open space, I have shown both gross and net assessments.

3.4.3. The next exercise was to identify appropriate contextual references. To enable an accurate assessment of footprint, this was limited to comparable residential areas (or immediately adjacent) where planning layout drawings are available to cross check the accuracy of footprints.

3.4.4. This led to the selection of 4 contextual locations, as follows and set out at Figure 1 (Appendix B), also reduced at **Inset 1** at page 11.

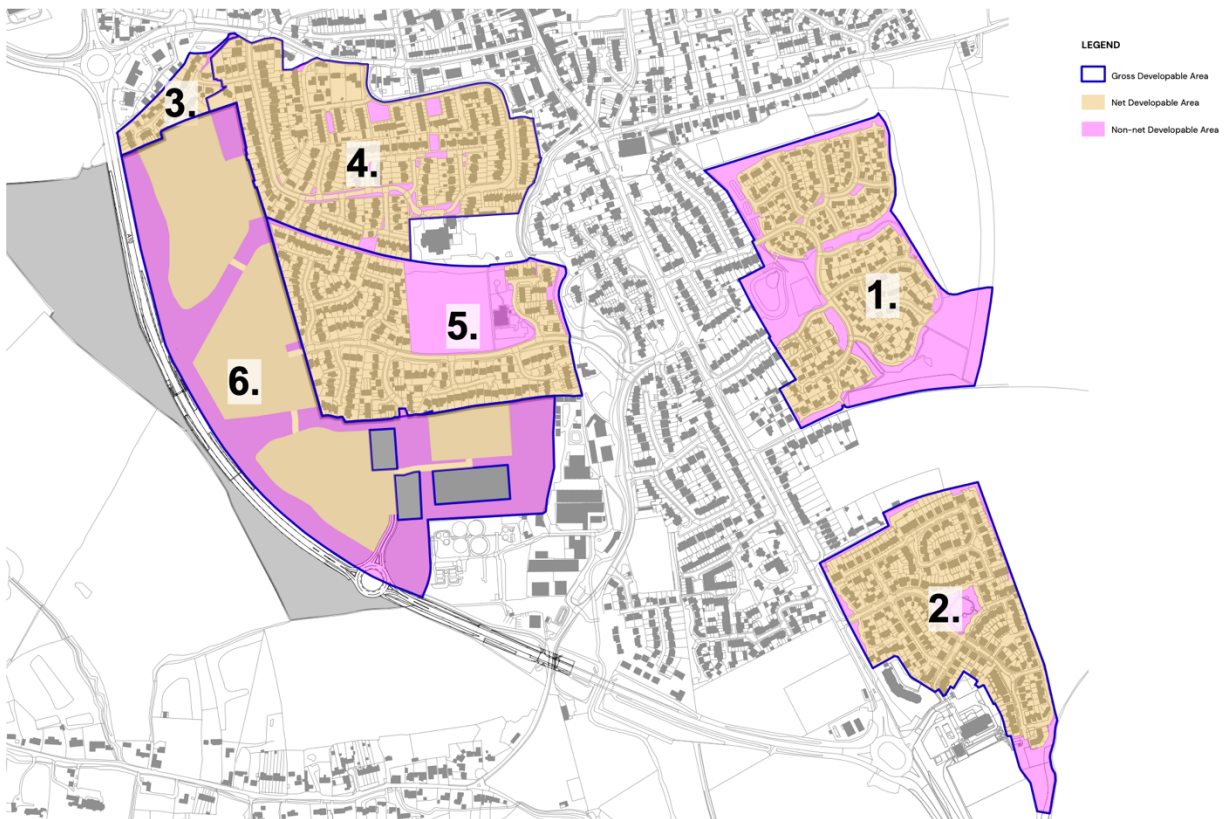
1. Land south of Hare Street Road – 200 dwellings over 2 applications (a third application is permitted but the footprint is not yet available on Mastermap) to the east of the settlement, which has a similar relationship to the appeal site regarding the settlement edge.
2. Former Sainsburys distribution depot to the south east of the settlement – 217 homes (and separately employment and primary school).
3. Land off Longmead – 26 dwellings to the immediate north of the appeal site.

4. Monks Walk – ~ 296 dwellings to the immediate north east of the appeal site, south of Baldock Road built in a wide variety of phases almost entirely over the 20th century.
 5. Watermill Meadows – 217 dwellings to the immediate east of the site, built in the early 1990s.
- 3.4.5. These locations (as well as the appeal site) are set out on **Figure 1** with the gross development area shown in blue and the net developable areas shown in light brown (the difference between these areas are shown in a light purple fill).
- 3.4.6. Each of these locations has the total number of houses identified by analysing the planning drawings and cross checking with OS MasterMap and Google StreetMaps. Area 4 is an exception to this process, as this area was built in several phases prior to planning drawings becoming available. For this area the process is the same as others, except for not being cross referenced against planning drawings to check footprint accuracy and total number of homes. Also, due to the delivery of this area in several phases less clarity exists regarding the total number of properties and how they may have been converted. Where a lack of clarity over housing numbers exists, areas have been excluded from the analysis, but overall the analysis of this specific area's housing numbers is less accurate than other areas.
- 3.4.7. The built footprint measurements (house and garage) within each of these existing housing areas are carried out digitally using Ordnance Survey MasterMap, which is the most accurate OS product, with a 99% confidence level of being within 0.9m of the British National Grid reference system, and within 0.5m of the root mean squared error. We only use parcels of land where we can check the accuracy of the footprint by comparing in CAD software with the permitted planning drawings.
- 3.4.8. This approach therefore generates a highly accurate comparable measurement of total footprint within each of the existing housing parcels identified above. In respect of the appeal scheme, we must use a different approach as the buildings are not yet built. Instead, we use the proposed housing mix, split into private and affordable breakdowns, using their gross internal areas (GIA) with a standard conversion to gross external area / footprint based on test measurements of comparable house and apartment types.
- 3.4.9. House footprints are typically 15% larger than their GIA and apartments (with greater shared space) is typically 20% larger. This figures are the product of actual measurements of house and apartment types, but there is some variation depending on the actual design. This calculation is set out on **Table 1** at page 12.
- 3.4.10. This assessment assumes that all housing is 2 storey in height (and therefore divided the GIA by 50% in the calculation to identify a comparable footprint). However, it is recognised that

the Height/Density Parameter Plan 4 (CD1.15) identifies a maximum height of up to 13.5 metre to ridge close to the local centre, with the remainder of the housing areas up to 10.5 metres height to ridge. These parameters are expressed as 'up to' and there is no guarantee that buildings above 2 storey in height will be permitted at reserved matters stage, but it is likely that there will be some (as encouraged by DP policy HOU2)¹. I have therefore assumed a very prudent position of basing footprint on all buildings being 2 storey in height.

3.4.11. However, it is reasonable to expect around 10% of the total number of properties being 2.5 or 3 storey. If this was the case, it would lead to the total footprint identified being around 3% less than calculated. I consider the effect of this potential future scenario within my assessment below, although the effect of this is modest.

Inset 1 – Appeal Scheme and Comparable Density Areas



3.5. DENSITY ANALYSIS

3.5.1. I set out at Table 2, at page 14, a summary table of density analysis considering both dwellings per hectare and plot ratio for gross and net developable areas (the appeal scheme gross area

¹ Also reference page 76 of the submitted DAS (CD1.9)

excludes land west of the A10). The box highlighted in yellow cross references with Table 1 to show how the appeal footprint analysis is used in Table 2.

3.5.2. Whilst this analysis necessarily goes into significant detail and detailed measurement to be robust, it should be used as a broad tool, and with this purpose in mind, this analysis confirms the following:

1. When considering dwellings per hectare measurements the appeal scheme contributes a significant amount of public open space to a much higher degree than seen in most locations of Buntingford, except for location 1, to the east of the settlement which is very similar. This is evident by the very low gross density figure (dph) and importantly the biggest difference between gross and net densities (dph) of all those assessed – see box coloured orange for cross reference.

Table 1 – Appeal Scheme Housing and Garage Footprint Calculation

Affordable							
House Type	Garage	Type	Average GIA (sq ft)	Average GIA (sqm)	Average Footprint (sqm)**	No.	Total Footprint (sqm)
1 bed	No	Apartment	581	54	32	28	907
2 bed	No	Apartment	763	71	43	19	808
2 bed	No	House	851	79	45	37	1,682
3 bed	No	House	1007	94	54	44	2,367
4 bed	No	House	1143	106	61	12	733
Total						140	6,496

Private										
House Type	Garage	Garage Footprint (sqm)*	Type	Average GIA (sq ft)	Average GIA (sqm)	Average Footprint (sqm)**	Average Footprint + Garage (sqm)	No.	Total Footprint (sqm)	
2 bed	No	0	Apartment	765	71	41		10	409	
2 bed	No	0	House	853	79	46		31	1,413	
3 bed	Single	18	House	1047	97	56	74	123	9,093	
4 bed	Single	18	House	1234	115	66	84	39	3,273	
5 bed	Double	30	House	1815	169	97	127	7	889	
Total								210	15,076	
Total	(Private + Affordable)									21,573

* single garage is based on a 6 x 3 metre external footprint and a double garage is based on a 6 x 5 metre footprint

** a 15% for houses and 20% for apartments conversion is applied to translate GIA to GEA (footprint). This is calculated by measuring actual house types GIA and footprint to identify an average percentage increase. This calculation is based on all buildings being 2 storeys in height (and is therefore the total GIA x 120% or 115%/2).

2. When considering the plot ratio density method, which is recommended by the PPG for a comparative exercise the gross development area (which the PPG recommends is used) delivers the lowest density of 11% footprint of those assessed (cyan fill) and significantly less than the average gross plot ratio of those sites assessed. A point of note is that a reasonable amount of the proposed public open space relates to the countryside edge and wide green 'fingers' that provide accessibility for public from the settlement to the countryside.
3. Moreover, even when discounting the public open space provision and relying instead on the plot ratio of the net developable areas, the appeal scheme creates a plot ratio of 21% (blue fill). This almost exactly matches the net plot ratio of the immediately adjacent Watermill Meadows (location 5), and slightly below Monks Walk (location 4) and matches the average net density of those assessed.
4. If 10% of the proposed development is 2.5 – 3 storey, particularly around the Local Centre as encouraged by policy HOU2 this would lead to around a 3% reduction in footprint, with a corresponding reduction in gross and net plot ratio of 1%, which would lead to the appeal scheme having the lowest gross plot ratio of all those assessed and the second lowest net plot ratio.

3.5.3. The commonsense conclusion arising from this analysis is that the appeal scheme promoted 40% affordable housing with a consequential smaller average house size when compared with other comparable / close by housing parcels within the settlement.

3.5.4. This (smaller) housing mix directly increases the net density when measured in dwellings per hectare terms, but this is misleading when compared to existing (larger) housing mixes. When compared based on an equivalent housing footprint the (maximum) amount of development proposed is of a much lower density to recent and local examples in gross terms and comparable with the average of these examples in net terms.

Table 2 – Comparable Density Analysis

							Density (dwellings per hectare)		Density (plot ratio)			
Ref	Location	Application Reference	Gross Area (Ha)	Net Area (Ha)	Number of homes (no)	Footprint (m2)	Gross dph	Net dph	Gross plot ratio*	Gross plot ratio**	Net plot ratio***	Net plot ratio****
1	Land South Of Hare Street Road	3/14/0970/ RP / 3/17/0073/	12.62	7.92	200	15,318	39.6	25.3	1,214	12%	1,934	19%
2	Former Sainsburys Distribution	3/15/0300/ OUT	8.99	7.76	316	17,806	35.2	40.7	1,981	20%	2,295	23%
3	Land Off Longmead Buntingford	3/12/1417/RP	1.17	1.08	26	2,378	22.2	24.1	2,032	20%	2,202	22%
4	Monks Walk	No Planning Ref Available	11.46	10.92	296	23556	25.8	27.1	2,056	21%	2,157	22%
5	Watermill Meadows, Buntingford	2/1858-89ZA	10.90	8.08	217	16,639	19.9	26.9	1,527	15%	2,059	21%
6	Appeal Scheme	3/23/1447/ OUT	18.82	10.35	350	21,573	18.6	33.8	1,146	11%	2,084	21%
7	Average (excluding appeal scheme)						23.8	28.8	1761.7	17.6%	2129.3	21.3%

* the gross plot ratio identifies how dense the building footprint is relative to open space, streets and gardens and is expressed here as footprint in m2 over 1 hectare. Gross areas are shown in blue on the associated plans.

** the gross plot ratio identifies how dense the building footprint is relative to open space, streets and gardens and is expressed here as the percentage of the site (excluding land west of the A10) that is taken up by building footprint. Gross areas are shown in blue on the associated plans.

*** the net plot ratio identifies how dense the building footprint is relative to only the built parts of the respective area (shown in brown on the associated plans) and is expressed here as footprint in m2 over 1 hectare.

**** the net plot ratio identifies how dense the building footprint is relative only the built parts of the respective area (shown in brown on the associated plans) and is expressed here as percentage of this site that is occupied by building footprint.

3.7. DOES THE APPEAL SCHEME PROPOSE AN APPROPRIATE MAXIMUM DENSITY?

3.7.1. As a consequence of the density analysis carried out above and at Appendix B, I have no concern regarding the appropriateness of the maximum amount of development being applied for. Any assessment of this maximum quantum of development must be cognisant of the housing mix this amount will be made up of and not rely on a dwelling per hectare measurement.

- 3.7.2. The appeal site (if built) will be understood and experienced by local people in its entirety, and as such the gross density figure is the most relevant to consider the impact on transition and character.
- 3.7.3. At present the existing settlement terminates relatively abruptly into the appeal site boundary (and is described at the final paragraph of page 1 of the DRP Report (CD18.1) as being a ragged arrangement of back gardens with an ill formed boundary with the site). I find that a combination of the lower gross density of the appeal scheme and the fact that open space is concentrated towards the outer more rural edge and the 'green fingers' accommodating movement from the existing settlement to the wider rural area, that in design and density terms, I consider the appeal scheme to handle this transition positively and successfully.

3.8. CONCLUSION

- 3.8.1. National Planning Policy strongly encourages making efficient use of land, this resonates through the NPPF, National Design Guide with additional guidance contained within the Planning Practice Guidance (PPG). The PPG encourages the analytical use of plot ratio measurements to understand how a site will relate to its surroundings.
- 3.8.2. Local policies also promote optimizing the use of land, sensibly identifying that density ranges should vary to respond to location – medium density on peripheral sites and higher density along main streets and local centres².
- 3.8.3. When investigating the density of the appeal scheme and several comparable and / or local existing examples in the settlement, using dwellings per hectare and plot ratio measurements to both gross and net developable areas a clear picture emerges.
- 3.8.4. Due to the policy compliant affordable housing mix being proposed, the average footprint size of each individual house within the appeal scheme is naturally much smaller than other comparable sites. This is not a phenomenon only found at Buntingford – we are seeing this analysis emerge across England in recent years where affordable housing provision is increasing.
- 3.8.5. When this approach is taken, the appeal site has the joint lowest gross density in plot ratio terms of the sites assessed, and is of a lower density than Watermill Meadows, the closest part of the settlement that public would walk through to access the proposed

² District Plan policies HOU2 and DES4

development. This gross measurement is the most important measurement for how local people will experience and understand the proposed development.

- 3.8.6. When net developable area is considered the appeal scheme matches the average identified within the settlement and is almost the same as Watermill Meadows (location 5) and less than Monks Walk (location 4).
- 3.8.7. This analysis should also have in mind the fact that this assessment does assess the maximum quantum applied for – there could be reasons that emerge through the detailed design process that led to this number not being reached. Equally, it assumes the appeal scheme is 2 storey in height – should 10% of the net developable area be 2.5 or 3 storey (which would be promoted by policy DES4) the plot ratio density figures would reduce further.
- 3.8.8. In conclusion, I see no evidence at all for concern that the maximum quantum being proposed is inappropriate or excessive. I find that the approach taken, when the site is considered as a whole would lead to a reduced density when compared to the adjacent settlement, and the structure of open space to the rural edge and along wide green fingers that frame the movement routes from the existing settlement, would act responsibly to enable a transition in density and urbanity from the existing settlement to the wider urban edge (when passing beyond the striking urban feature of the A10).

4. CHARACTER AND APPEARANCE GUIDANCE

4.1. INTRODUCTION

4.1.1. This chapter of my evidence considers whether the maximum density / number of dwellings applied for would:

1. Lead to a dense and urban appearance, and;
2. Conflict with the existing character and appearance of the settlement.

4.2. SCHEME CHARACTER AND APPEARANCE

4.2.1. The approach taken in the application to character and appearance is largely as set out from page 66 of the Design and Access Statement (CD1.9) which addresses 'Placemaking'. This approach has been shaped by an involved consultation process, which included an external Design Review in April 2022 (CD18.1) at an early stage in the scheme's evolution (albeit at that time this was informing a separate hybrid application for up to 400 dwellings).

4.2.2. I identify below four principal factors that will shape the character and appearance of the proposed scheme.

1. The hierarchy of access and streets

4.2.3. The proposed development has a notable new access roundabout leading from the A10 that leads to the local centre and employment area, but also establishes a principal street typology (names the 'boulevard') that continues westwards through the residential parcels to the north. This creates a strong 'spine' to the scheme that greatly aids legibility. From this spine leads a network of streets, lanes and private drives to reduce the formality and strength of these streets towards the edges of the scheme, either where it leads to the countryside edge or green corridor (DAS page 73 CD1.9). This approach also co-ordinates with the pedestrian and cycle network, which is partly contained within open space and partly within streets (DAS page 69 CD1.9).

4.2.4. I consider this approach appropriate in good urban design practice and appropriate to the site's context.

2. The positioning of land-use and its associated scale

4.2.5. The promotion of small-scale employment land (up to 4,400sqm Class E and B8) (see Height/Density Parameter Plan 4 CD1.15) to the eastern part of the site adjacent to the site's

access from the A10 and within the Local Centre is a positive feature. It creates structure, hierarchy and function within the residential area and provides a meaningful wider role for the settlement and immediately adjacent areas. This benefit was also welcomed by the Design Review Panel (paragraph 3, page 6 CD18.1).

4.2.6. The Height/Density Parameter Plan 4 (CD1.15) also promotes a higher density for residential land around the local centre (up to 40dph) – see also page 76/77 of the DAS CD1.9) although the approach taken stops short of forcing a minimum density to avoid constraining design development at reserved matters stage. Incorporating taller elements around the local centre was encouraged by the Design Review (paragraph 2 page 4 CD18.1) to reinforce the idea of a nodal centre.

4.2.7. I agree with this position – it is necessary within this higher density area to reinforce the role of the local centre in the wider settlement, but also to transition appropriately to where proposed housing meets the existing settlement edge (hence why an ‘up to 40dph’ approach is the right one in my view). Following the Design Review the local centre as stepped father away from the existing settlement edge and increased open space widens the transition (see 4.4.8 item 4 below).

5. The arrangement and character of open space.

5.1.1. The Design and Access Statement (CD1.9) considers landscape and green infrastructure from page 80 (see also Green Infrastructure Parameter Plan 3 – CD1.14). The overarching open space arrangement strategy can be simply described as:

1. Placing retained agriculture and biodiversity enhancement to the west of the A10.
2. Creating a wide buffer to the east of the A10.
3. Aligning multi-functional green corridors with public footpaths and hedgerows.
4. Positioning multi-functional green and blue infrastructure to the east.
5. Placing allotments to the north.

5.1.2. The design approach to open space has evolved to promote natural open space to the development’s western edge, adjacent to the A10 – which assists with the principle of transition to rural as considered further by Jon Etchells. The approach also concentrates on making the green corridors within the residential areas sinuous and active spaces for people with amenity green space and play areas concentrated within the locations (see pages 84/85 of the DAS – CD1.9). The more flowing, sinuous form of these spaces was a reaction to the Design Review Panel report (see 4.4.8 item 2 below).

- 5.1.3. In respect of the green corridors within the scheme, pages 82, 86 and 87 of the DAS (CD1.9) illustrate dimensions of these corridors, identifying:
1. The northern green corridor is ~27m wide to the edge lanes (wider between properties and it widens to the south – see page 83 of the DAS (CD1.9).
 2. The green corridor between the northern and southern parcels is ~42 metres between the edge lanes – see top section on page 87 of the DAS (CD1.9).
 3. A back-to-back separation between proposed and existing properties on Knights Close of ~ 32.5 metres and on Monks Walk of ~28 metres – see middle and bottom sections on page 87 of the DAS (CD1.9).
- 5.1.4. These sections also demonstrate that the Neighbourhood Plan (CD4.3) Appendix 4 Design Code requirements regarding back-to-back distances have been taken into consideration regarding existing levels.
- 5.1.5. I consider this approach to open space to be appropriate, highly responsive to the site's features whilst delivering over 185% of the local open space policy requirements (7.8Ha open space provided / 4.18Ha required – see page 84 of the DAS CD1.9).

4. The appearance of buildings and streets

- 5.1.6. Pages 78 and 79 of the Design and Access Statement (CD1.9) considers appearance, stating (in the first paragraph of page 78) the approach taken is:
- “not to be rigid or prescriptive in terms of the development’s architecture, but to provide some guiding principles on the development’s appearance. It is not just about the design and architecture of individual buildings, but also the way the streets, plots and the landscape is designed that is important to the appearance of the place. ”*
- 5.1.7. The Design and Access Statement (CD1.9) goes on to say in the final two paragraphs of page 78 that to assist in creating a sense of place some variety in materials is suggested. It goes on to identify three different residential character areas, as set out on page 79 (the ‘Boulevard’, ‘Street’ and ‘Green Edge’).
- 5.1.8. The DAS (CD1.9) goes on to set out at page 79 an ‘Illustrative Character Areas’ plan that illustrates the locations of the residential areas of character and appearance differentiation (along with the Local Centre / Employment areas).

- 5.1.9. My evidence contains additional information (at Appendix C) that sets out how the Illustrative Character Areas could, for the residential areas, be used as a code to help structure reserved matters design discussion in this regard. If this is deemed useful, we would expect a planning condition with a general accordancy requirement to ensure this further detailed guidance is used effectively and consistently (see draft planning condition 5).
- 5.1.10. I consider the approach taken to be appropriate for an outline application in varying the principles of character and appearance of the proposed development in response to its context. I also consider the additional focused design code information to reflect good practice in forming a mechanism to ensure these principles are consistently applied at reserved matters stage.

5.2. HOW DENSITY RELATES TO CHARACTER AND APPEARANCE

- 5.2.1. I have considered the subject of density, and how to measure and compare this appropriately at Section 3 of my evidence. However, it is not unreasonable to expect the question “does the difference in net dwellings per hectare between the appeal site and its immediate context translate to a notable character effect” to be answered; which I set out below.
- 5.2.2. We know that the amount of built footprint over any given area (gross or net plot ratio density) does not differ to any notable degree between the appeal scheme and the adjacent Buntingford Meadows or Monks Walk. The only potential relevance is therefore the difference between the appeal scheme and its context in respect of dwellings per hectare.
- 5.2.3. In respect of net dwellings per hectare, the appeal scheme averages slightly below 34 dwellings per hectare whilst the adjacent Buntingford Meadows and Monks Walk net average is around 27 dwellings per hectare. When considering the gross densities in average dwellings per hectare, the position is reversed with the appeal scheme being 18.6dph, Buntingford Meadows being 19.9dph and Monks Walk being 25.8dph. The net measure affects only the built-up areas, the gross affects the perception of density across the site.
- 5.2.4. However, there are also more nuanced points to consider in answering this question:
- 5.2.5. The density of the scheme will vary considerably across the scheme in response to its context and good placemaking – the parameter plans set out a basic guide of around 30dph to the north and up to 40dph to the south/east. I would expect the highest density built form to be located around the local centre, but only where it is set away from the existing settlement edge (for the benefit of reinforcing the hierarchy and legibility of the local centre (as

discussed at paragraph 4.2.6 above). It is also expected that density will be reduced around its western, more rural edge.

- 5.2.6. I would also expect the residential north of the employment land to be of a lower scale and density to enable a transition from the existing settlement. This expectation is reflected in the Illustrative Character Areas that identify this residential location as being 'Green Edge' and 'Streets' (see DAS CD1.9 page 79).
- 5.2.7. Furthermore, the 'principal factors' of character that I introduce at 4.2.2 are not affected by a modest difference in net dwellings per hectare density (27dph to 34dph net is a maximum 25% increase in net density). This is partly due to the PPG (CD5.2/Appendix A) setting out that the correct way to measure density for the purpose of indicating how a development will relate to its surroundings is the plot ratio method. In this regard the appeal scheme matches its immediate context in density terms.
- 5.2.8. However, in more practical terms, when considering dwellings per hectare, the relevant question is "would 25% more houses and front doors of an average smaller average house size notably alter the character of a street with 25% fewer larger properties?".
- 5.2.9. My response is that if the major character factors (such as the street geometry, the built form character, the sharing of driveways...etc) are unchanged there would be very little difference with 25% more smaller properties in any given street. Smaller properties would attract fewer people and less cars (as it would lead to a reduced average number of bedspaces), and whilst there is no fixed gradient of people or cars per household size, this would undoubtedly be the effect.
- 5.2.10. When considering how the number of gross average dwellings per hectare across the whole site, the appeal scheme is slightly lower than Buntingford Meadows (and notably less than Monks Walk) and this suggests that for someone moving through the existing adjacent settlement and through the appeal scheme, the perception will be that the proposed development is provided with more breathing space along green corridors and set back from the A10.
- 5.2.11. In conclusion, dwellings per hectare is not the right measure of comparison between existing and new dwellings, but if you only considered that measurement as the net average and compared the appeal scheme with the adjacent Buntingford Meadows/Monks Walk, the principal factors in creating character would not be notably altered.
- 5.2.12. By way of comparison, the (positive) modern requirement set out in the NPPF (CD5.1 para 136) to provide street trees, would lead to a more noticeable (positive) difference in character with

these areas than having more smaller houses in a street, as the adjacent part of the town was developed at a point in time where street trees were not strongly promoted, and consequently do not feature in Oak End, Luynes Rise or Monks Walk to the appeal site's immediate east.

5.3. DESIGN REVIEW PANEL

5.3.1. When considering matters such as the character and appearance of built form, it is important to understand what investigations have been carried out to discuss and agree an approach to this matter.

5.3.2. The NPPF (CD5.1 para 138 page 41) describes Local Planning Authorities having access to and making use of tools and processes for this purpose, which could include design review panels and design codes. In respect of the former, they should be used early in the evolution of schemes and local planning authorities should have regard to the outcome from these processes.

5.3.3. A design review panel process was carried out in April 2022 during the evolution of a hybrid application for the appeal site (3/22/1551/FUL) which was subsequently refused. However, this appeal scheme is consistent with the scheme advanced at the design review (aside from at that stage the scheme was for up to 400 dwellings not 350) and does directly relate to the appeal scheme.

5.3.4. The Officer's report for the appeal scheme refers to the DRP Report (CD18.1 PDF page 18, 2nd paragraph) but it appears to have not been provided or considered further.

5.3.5. The Design Panel submission (CD18.2) and Report (CD18.1) are contained within Core Documents. This design review report was, as advised by the NPPF, carried out at an early stage (see CD18.1 paragraph 5, page 1) and covers a wide range of topics.

5.3.6. The DRP Report (CD18.1) assesses the character of the Buntingford at the 2nd paragraph of page 2, stating:

It is noted that Buntingford incorporates a classic historic town centre that is characterized by more intense historical development. The town also comprises a number of 20th and early 21st century estates that appear bolted on to the town that incorporate a distinct character representative of their time.

5.3.7. The DRP Report (CD18.1) goes on in the same paragraph to encourage not following this local character / car dependent approach. It questions the need to reflect local character in the 4th paragraph of page 2, due to this approach not being innovative. It also suggests (in the 2nd

paragraph of page 4) it might be appropriate to incorporate taller elements around the local centre as this reinforces the idea of a nodal centre.

5.3.8. Several high-level scheme changes were made from this DRP report that reflected the comments made, these include aspects such as:

1. The development set back from the A10 was increased, and the edge was more sinuous / less regular, leading to an increased amount of open space between the A10 and the development.
2. The northern public footpath green corridor, and the green corridor between north and south land parcels were increased in width, and made more sinuous / less regular in form, with play areas similarly made more organic / less regular in shape.
3. The allotments were positioned more northwards to allow built form to relate to the existing settlement edge more closely.
4. More open space is provided to create increased separation between the proposed local centre and existing settlement edge, to allow users of the existing footpath when moving beyond the existing urban edge to arrive at an open space prior to meeting the proposed local centre. Increased open space is also provided around the main vehicular entrance.

5.3.9. It is evident from the DRP process that the scheme has evolved notably in response and that these changes are relevant to the claimed harm identified within the third reason for refusal. The changes have created more internal space to ease a transition through the appeal site, with greater set back from the A10 and rural character beyond this urbanising feature. Increased open space also assists in the transition between the existing settlement and the new local centre.

5.4. FUTURE DESIGN CONTROL MECHANISMS

5.4.1. The appeal scheme is in outline, and therefore how the scheme is realised is subject to Reserved Matters applications. Planning conditions typically (and indeed in this case) bind outline planning permissions to the respective applications and occasionally also refer to prepared design codes, or design codes to be prepared.

5.4.2. With this in mind, I have instigated the preparation of more detailed coding information to be provided for the three residential character areas as set out in the Design and Access Statement (CD1.9 page 78/79).

- 5.4.3. This material is contained at Appendix C and is considered appropriate to either control by an appropriate planning condition at this stage (see draft condition 5), or for this to form the basis of a separate agreement of coding information during the reserved matters stage.
- 5.4.4. This approach would fix and give reassurance regarding the final principal factor³ that will shape the character and appearance of the proposed development, as set out from paragraph 4.2.2 above.
- 5.4.5. I consider this approach to be both appropriate and aligned with national policy, specifically the National Planning Policy Framework (CD5.1 para 138 page 41).

5.5. CONCLUSION

- 5.5.1. The appeal scheme (at its maximum density) does not lead to a dense and urban appearance. This is partly due to the coverage of built form (plot ratio density) being very similar to the existing and adjacent parts of the town, but it is also influenced by the key design decisions that affects how buildings are arranged and positioned.
- 5.5.2. I consider the appeal scheme to have several high-level factors that principally influence its character, these being:
1. The hierarchy of access and streets
 2. The positioning of land-use and its associated scale
 3. The arrangement and character of open space.
 4. The appearance of buildings and streets
- 5.5.3. As a result of these high level factors, the fact that the plot ratio density is similar to existing and dwellings per hectare is around 25% more would not lead to a dense and urban appearance.
- 5.5.4. Having a modest increase in the number of properties that are smaller than those found locally is a helpful cross check to understand that the maximum amount applied for would not lead to a dense and urban appearance.
- 5.5.5. The appeal scheme has evolved through a consultative process including an external Design Review panel process (which has directly shaped the appeal scheme). The outline application sets out development parameters (in the form of parameter plans – CD1.12-1.15 –that would be

³ Paragraph 4.2.13 – the appearance of streets and buildings.

fixed via condition) and design principles (expressed through the Design and Access Statement – CD1.9).

- 5.5.6. My evidence creates design coding information for the residential character areas that could be fixed by condition (see draft condition no. 5).
- 5.5.7. I therefore consider the appeal scheme at its maximum density to not create a dense and urban appearance, it would not be out of character with its immediate context. The appeal scheme has followed a robust design process that could / will have onward design controls to ensure the reserved matters applications reflect the design principles identified.

6. POLICY ASSESSMENT

6.1. INTRODUCTION

6.1.1. I assess below how the appeal scheme performs relative to the national and local planning policies and guidance relating to density and character matters as identified in the third reason for refusal.

6.2. NATIONAL PLANNING POLICY

6.2.1. I consider the appeal scheme to carefully balance its responsibilities in respect of making effective use of land whilst responding positively to its context. For the reasons I set out in more detail at section 3 of my evidence, I consider the appeal scheme does make efficient use of land, it matches the average density in net terms for those parcels assessed within the settlement, and in gross terms it is reduced due to the provision of open space. This is essentially the test set out at 128-130 and 135 c) and e) which I consider the appeal scheme to be in accordance with.

6.2.2. In respect of character and appearance, as set out at my section 4, I find that the appeal scheme will function well and add to the overall quality of the areas, as a result of its high level design decisions and is sympathetic to the surrounding built environment and landscape setting for the same reason.

6.3. LOCAL AND NEIGHBOURHOOD PLANNING POLICY

6.3.1. For similar reasons to that given above, I find the appeal scheme to be in accordance with District Plan policies HOU2 and DES4.

6.3.2. I consider the appeal scheme, appreciating its context, to be no higher than medium density and this is aligned with the description in HOU2 (medium density at edge of town/settlement location).

6.3.3. The suggestions in DES4 for density to respond to context I consider to be sensible and reflect good practice. The appeal scheme is aligned with this guidance by raising density around the local centre and (notably in gross density terms) reducing densities to the site's outer edges.

6.3.4. As an outline application, there are significant stages to go to understand in detail how the scheme can be realised, and of course detailed discussions with the Local Authority will inevitably follow if the scheme is permitted to allow this detailed to evolve in a positive direction. Such design development will be guided by the DAS and through engagement and I

suggest should be further supplemented by design guidance material contained at Appendix C (for which a general accordance planning condition could be created – see draft planning condition no. 5).

- 6.3.5. In respect of the Neighborhood Plan, policy HD 4 requires development to accord with the Design Code contained at Appendix D that is largely concerned with space between dwellings. This is largely a matter for detailed design and reserved matters, and it is evident from the density analysis contained in section 3 of my evidence that the net footprint plot ratio matches the average of comparable sites and is broadly the same as the adjacent Watermill Meadows, and this should give reassurance as to appeal scheme's ability at the maximum density to meet these requirements.

6.4. CONCLUSION

- 6.4.1. My evidence considers the third reason for refusal and second main issue insofar as the density of the proposed development would harm the character and appearance of the area.

- 6.4.2. Having followed a detailed analysis of the density of the appeal scheme at its maximum quantum, and compared to similar or adjacent parcels of residential land, I find the density of the appeal scheme to:

1. Be appropriate to the site's context and makes effective use of land thereby reflecting national planning policy.
2. Reflect local planning policy insofar as being no higher than medium density for a settlement's peripheral location and it encourages a range of densities within the site to respond to context (gateway / local centre is higher, edges are lower).
3. Provide reassurance that the footprint plot ratio density is no higher than the average found locally (and lower than other recent examples) which gives confidence that the very detailed plot requirements regarding garden sizes and separation standards set out in neighbourhood plan policy (HD4) can be met at the detailed design stage.

- 6.4.3. My evidence considers how the maximum density of the appeal scheme relates to the character and appearance of the area, concluding it does not create a dense and urban appearance and would not be out of character with its immediate context.

7. CONCLUSION AND SUMMARY PROOF OF EVIDENCE

7.1. REASON FOR REFUSAL 3

7.1.1. The third reason for refusal claims that it has not been demonstrated that the application site can accommodate the maximum quantum of development applied for. It goes on to claim that (only) at the maximum level applied for, a dense and urban appearance would be created. This appearance would not respect the rural and landscape character of the site and would fail to enable a transition between the urban settlement boundary and the countryside beyond.

7.2. ANALYSING DENSITY

7.2.1. National Planning Policy strongly encourages making efficient use of land, this resonates through the NPPF, National Design Guide with additional guidance contained within the Planning Practice Guidance (PPG). The PPG encourages the analytical use of plot ratio measurements to understand how a site will relate to its surroundings.

7.2.2. Local policies also promote optimizing the use of land, sensibly identifying that density ranges should vary to respond to location – medium density on peripheral sites and higher density along main streets and local centres⁴.

7.2.3. When investigating the density of the appeal scheme and several comparable and / or local existing examples in the settlement, using dwellings per hectare and plot ratio measurements to both gross and net developable areas a clear picture emerges.

7.2.4. Due to the policy compliant affordable housing mix being proposed, the average footprint size of each individual house within the appeal scheme is naturally much smaller than other comparable sites. This is not a phenomenon only found at Buntingford – we are seeing this analysis emerge across England in recent years where affordable housing provision is increasing.

7.2.5. When this approach is taken, the appeal site has the joint lowest gross density in plot ratio terms of the sites assessed, and is of a lower density than Watermill Meadows, the closest part of the settlement that public would walk through to access the proposed development. This gross measurement is the most important measurement for how local people will experience and understand the proposed development.

⁴ District Plan policies HOU2 and DES4

- 7.2.6. When net developable area is considered the appeal scheme matches the average identified within the settlement and is almost the same as Watermill Meadows (location 5) and less than Monks Walk (location 4).
- 7.2.7. This analysis should also have in mind the fact that this assessment does assess the maximum quantum applied for – there could be reasons that emerge through the detailed design process that led to this number not being reached. Equally, it assumes the appeal scheme is 2 storey in height – should 10% of the net developable area be 2.5 or 3 storey (which would be promoted by policy DES4) the plot ratio density figures would reduce further.
- 7.2.8. In conclusion, I see no evidence at all for concern that the maximum quantum being proposed is inappropriate or excessive. I find that the approach taken, when the site is considered as a whole would lead to a reduced density when compared to the adjacent settlement, and the structure of open space to the rural edge and along wide green fingers that frame the movement routes from the existing settlement, would act responsibly to enable a transition in density and urbanity from the existing settlement to the wider urban edge (when passing beyond the stroking urban feature of the A10).

7.3. CHARACTER AND APPEARANCE

- 7.3.1. My evidence considers the third reason for refusal and second main issue insofar as the density of the proposed development would harm the character and appearance of the area.
- 7.3.2. Having followed a detailed analysis of the density of the appeal scheme at its maximum quantum, and compared to similar or adjacent parcels of residential land, I find the density of the appeal scheme to:
1. Be appropriate to the site's context and makes effective use of land thereby reflecting national planning policy.
 2. Reflect local planning policy insofar as being no higher than medium density for a settlement's peripheral location and it encourages a range of densities within the site to respond to context (gateway / local centre is higher, edges are lower).
 3. Provide reassurance that the footprint plot ratio density is no higher than the average found locally (and lower than other recent examples) which gives confidence that the very detailed plot requirements regarding garden sizes and separation standards set out in neighbourhood plan policy (HD4) can be met at the detailed design stage.

7.3.3. My evidence considers how the maximum density of the appeal scheme relates to the character and appearance of the area, concluding it does not create a dense and urban appearance and would not be out of character with its immediate context.

7.4. POLICY ASSESSMENT

7.4.1. My evidence considers the third reason for refusal and second main issue insofar as the density of the proposed development would harm the character and appearance of the area.

7.4.2. Having followed a detailed analysis of the density of the appeal scheme at its maximum quantum, and compared to similar or adjacent parcels of residential land, I find the density of the appeal scheme to:

1. Be appropriate to the site's context and makes effective use of land thereby reflecting national planning policy.
2. Reflect local planning policy insofar as being no higher than medium density for a settlement's peripheral location and it encourages a range of densities within the site to respond to context (gateway / local centre is higher, edges are lower).
3. Provide reassurance that the footprint plot ratio density is no higher than the average found locally (and lower than other recent examples) which gives confidence that the very detailed plot requirements regarding garden sizes and separation standards set out in neighbourhood plan policy (HD4) can be met at the detailed design stage.

7.4.3. My evidence considers how the maximum density of the appeal scheme relates to the character and appearance of the area, concluding it does not create a dense and urban appearance and would not be out of character with its immediate context.

7.5. OVERALL CONCLUSION

7.5.1. When considering that the appeal scheme is 40% affordable and with a relatively small average house size, the maximum average density being proposed (33.8 dph) should not on the face of it give rise to any cause for concern. This is particularly at a time of applications and local plans promoting much higher density than this for comparable sites across the country.

7.5.2. This was my immediate impression, both on my initial assessment of the appeal scheme submission material, and on visiting the site. Having now had the benefit of assessing the density of the maximum quantum of development in more detail, and having carried out a

density assessment that provides a like for like analysis of the appeal scheme and its context, the detailed facts support this initial impression.

- 7.5.3. The appeal site is contained to the west by a major road (A10) which forms a tight urban edge but has public rights of way across it to the wider countryside. The urban area is mixed in character and has evolved over the latter half of the 20th century and the early 2000's.
- 7.5.4. The appeal scheme would be highly comparable to the adjacent part of the existing settlement in net density terms (using plot ratio) but in real terms, as experienced by local people, the gross density would be much less. This is due to the open space arranged around the outer edge of the proposed development, and along generous green 'fingers' which align with footpath routes into / form the existing settlement.
- 7.5.5. I see no reason why the maximum amount of accommodation could not be successfully positioned within the site, certainly the density figures give no cause for concern – numerous examples across the country are delivering successful schemes in similar locations to a higher density than proposed as a maximum.
- 7.5.6. Similarly, my evidence makes it clear that the maximum density applied for should not give rise to character concerns and would not create an excessively dense or urban appearance.