

Land East of the A10 Buntingford, Hertfordshire Proof of Evidence – Effects on Landscape Character and Appearance

Appeal by Countryside Partnerships Ltd and
Wattsdown Developments Ltd

LPA Reference: 3/23/1447/OUT

PINS Reference: APP/J1915/W/24/3340497

Robert Browne, BSc (Hons), MA, CMLI

June 2024

wynne-williams associates
landscape architects & arboricultural consultants

Robert Browne Proof of Evidence

Contents

1	Introduction	3
1.1	Qualifications and Experience.....	3
1.2	Scope of my Evidence.....	3
1.3	Guidance Used in Compiling my Evidence.....	4
1.4	Structure of my Evidence.....	5
2	Planning Policy Context.....	5
2.1	Introduction.....	5
2.2	National Planning Policy Framework (NPPF).....	5
2.3	Local Planning Policies.....	5
2.3.2	East Herts District Plan 2018.....	5
2.3.3	Buntingford Community Area Neighbourhood Plan 2014-2031	6
3	Methodology	6
4	Existing Landscape Character	8
4.1	Introduction.....	8
4.2	Landscape Character Baseline Assessments	8
4.3	Observed Landscape Character	13
4.4	Landscape Receptors	14
4.5	My Assessment of Landscape Value	15
4.6	Susceptibility to Change and Character Sensitivity.....	19
5	Landscape Effects of the Proposals.....	21
5.1	Introduction.....	21
5.2	Magnitude of Landscape Effects	21
5.3	Significance of Landscape Effects.....	24
6	Visual Effects of the Proposals.....	26
6.1	Introduction.....	26
6.2	Receptors and Visual Sensitivity.....	26
6.3	Magnitude and Significance of Visual Effects	27
7	Proposed Housing Density.....	32
8	Conclusion and Summary	33

1 Introduction

1.1 Qualifications and Experience

- 1.1.1 This evidence has been compiled by Robert Browne, Director at Wynne-Williams Associates, a firm of Chartered Landscape Architects, registered with the Landscape Institute.
- 1.1.2 I hold a BSc (Honours) degree in Geography, an MA in Landscape Architecture, and I am also a Chartered Member of the Landscape Institute (CMLI). I have 8 years' experience in both planning and design projects across the commercial, residential, education, and care sectors. I specialise in landscape planning work and regularly produce landscape and visual impact assessments (LVIAs), townscape and visual impact assessments (TVIAs), landscape character assessments (LCAs), site appraisals including Green Belt Assessments, and provide expert evidence for planning appeals on behalf of both appellants and Local Authorities. My work covers a range of scales varying from sites including a single proposed dwelling to advising on the effects of Nationally Significant Infrastructure Projects (NSIPs).
- 1.1.3 I understand my duty to the Inquiry and have complied with and will continue to comply with that duty. The evidence that I have prepared and provide for this Inquiry is true. My evidence has been prepared and is given in accordance with the guidance and code of practice of the Landscape Institute. I confirm that the opinions given are my true and professional opinions.

1.2 Scope of my Evidence

- 1.2.1 In May 2024, I was appointed by East Hertfordshire District Council (EHDC), to prepare evidence for this Inquiry.
- 1.2.2 In a decision notice dated 15th February 2024, EHDC refused permission for "Outline planning application (with all matters reserved except for access) for up to 350 dwellings, up to 4,400 sqm of commercial and services floorspace (Use Class E and B8), and up to 500 sqm of retail floorspace (Use Classes E) and other associated works including drainage, access into the site from the A10 and Luyes Rise (but not access within the site), allotments, public open space and landscaping" on Land East off the A10 Buntingford, Hertfordshire.

- 1.2.3 The Decision Notice sets down five reasons for refusal of the application. My evidence relates to Reason 1 and Reason 3 only:
- 1.2.4 **Reason for Refusal 1** – “The proposal comprises a substantial urban extension of Buntingford which would encroach into the rural area beyond the Green Belt, beyond the settlement boundary, to the detriment of the landscape character, rural appearance, and distinctiveness of the area contrary to Policies DES2, DES3, DES4, GBR2 of the East Herts District Plan (2018), Policies ES1, HD1, HD2, HD4 and BE2 of the Buntingford Community Area Neighbourhood Plan and the National Planning Policy Framework”.
- 1.2.5 **Reason for Refusal 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”.
- 1.2.6 I have reviewed the relevant application documents and applicable policy documents, and I have made multiple site visits to appraise the appeal site and its environs in terms of landscape character and visual impact. My evidence provides my professional opinion on the potential effects of the appeal scheme on the existing landscape character and appearance.

1.3 Guidance Used in Compiling my Evidence

- 1.3.1 I have used the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) published by the Landscape Institute and the Institute of Environmental Management and Assessment (C.D 15.4) in the preparation of my evidence.
- 1.3.2 I have also used Landscape Institute Technical Guidance Note TGN 02-21: ‘Assessing Landscape Value Outside National Designations’ (C.D 15.1) to inform my assessment of landscape value for the site and surroundings.

1.4 Structure of my Evidence

1.4.1 My evidence is structured as follows.

Section 2 considers the planning policy context in relation to landscape issues.

Section 3 explains the methodology used for assessing the impact of the development.

Section 4 presents the existing landscape setting to the site and its character.

Section 5 sets down the effects of the proposals on landscape as a resource and character.

Section 6 considers the visual effects of the proposals.

Section 7 is a summary and conclusion to my evidence.

2 Planning Policy Context

2.1 Introduction

2.1.1 In this section I consider the relevant landscape related policies at national and local level.

2.2 National Planning Policy Framework (NPPF)

2.2.1 The areas of the NPPF (December 2023) relevant to landscape, character, and appearance with regards to this appeal are listed below:

2.2.2 Paragraph 135

2.2.3 Paragraph 180(b)

2.3 Local Planning Policies

2.3.1 Local planning policies relevant to this appeal related to landscape character and appearance, are listed below.

2.3.2 East Herts District Plan 2018

Policy DES2 – Landscape Character

Policy DES3 – Landscaping

Policy DES4 – Design of Development

Policy HOU2 – Housing Density

2.3.3 Buntingford Community Area Neighbourhood Plan 2014-2031

Policy ES1 - Development proposals should be appropriate to and maintain the Rib Valley setting of the Buntingford Community Area (BCA).

Policy HD2 - All new housing developments should be sensitive to the landscape and be of a height that does not impact adversely on views from the surrounding countryside. All development proposals should demonstrate how they conserve, enhance or strengthen the character and distinctive features of the BCA landscape.

Policy HD4 - New housing design should respect the rural/semi-rural character of the Buntingford Community Area and its immediate context having appropriate regard to the standards set out in the BCA Design Code.

Policy BE2 – Proposals to extend industrial sites must contribute to the character and vitality of the local area and not adversely affect the attractiveness of the local countryside.

3 Methodology

- 3.1.1 'Development' is defined in the GVLIA3 as 'any proposal that results in a change to the landscape and/or the visual environment'. My evidence considers both the landscape character and the visual environment and the impact that the proposed development would have on both.
- 3.1.2 The GLVIA3 methodology requires 'establishing the baseline landscape and visual conditions (which) will, when reviewed alongside the description of the development, form the basis for the identification and description of the landscape and visual effects of the proposal' (para 3.15 page 32).
- 3.1.3 The landscape baseline is defined with the aim to 'provide an understanding of the landscape in the area that may be affected – its constituent elements, its character and the way that this varies spatially, its geographic extent, its history, its condition, the way the landscape is experienced, and the value attached to it' (para 3.15 page 32).
- 3.1.4 I have reviewed the existing studies which seek to establish the baseline landscape character and sensitivities for the site and the surrounding area. I have also undertaken site visits to verify the extent to which the site is typical of these studies and the degree to which the

development would impact on the existing landscape. This evidence sets out the results of these reviews in Section 4.

3.1.5 The visual baseline study has the 'aim to establish the area in which the development may be visible, the different groups of people who may experience views of the development, the places where they will be affected and the nature of the views and visual amenity at those points.' (para 3.15 page 32).

3.1.6 GLVIA3 defines the value of a given landscape as 'The relative value that is attached to different landscapes by society' (para 5.19 page 80) and provides a range of factors that can help in the identification of valued landscapes. However, the Landscape Institute have subsequently published a detailed Technical Guidance Note on Assessing Landscape Value Outside of National Designations (TGN 02/21) in February 2021. This guides my methodology for assessing the landscape value of the site, which in turn forms part of my landscape sensitivity opinion of the site. Landscape value is considered in Section 4.

3.1.7 GLVIA3 also provides guidance on assessing the significance of landscape effects. This requires the consideration of the sensitivity of landscape receptors (defined aspects of the landscape that have the potential to be affected by the proposal).

The sensitivity of a landscape is defined in GLVIA3 as the combination of the site and its surroundings' susceptibility and value. Susceptibility is the 'ability of the landscape receptor to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and /or the achievement of landscape planning policies and strategies' (pages 88 and 89 para 5.40). I consider the susceptibility and sensitivity of the site and its surroundings in Section 4.

3.1.8 Where possible, my assessments of potential landscape and visual effects have been determined using the criteria and definitions from the methodology provided within the Appellant's submitted LVIA. The aim of basing my assessments on this methodology is to provide consistency in the terminology and scales of effects used within the Inquiry. This is intended to aid the Inspector in their consideration of the evidence.

4 Existing Landscape Character

4.1 Introduction

4.1.1 In this section I consider the existing baseline studies which have been undertaken for the site and surrounding area, the extent to which the site is typical of those studies, as well as the value and susceptibility of the landscape of the appeal site and its surroundings.

4.2 Landscape Character Baseline Assessments

4.2.1 The site is located within the study area of several landscape character assessments ranging from a national to local scale. Each study provides baseline descriptions of the landscape character.

4.2.2 **Natural England National Character Area (NCA) 86 South Suffolk and North Essex Clayland (C.D. 15.3)**

At a national scale, the appeal site lies within NCA South Suffolk and North Essex Clayland. This overview assessment covers a broad area from Stevenage in the west to Ipswich in the east.

4.2.3 Due to the broad scale of this assessment, not all of the key characteristics and descriptive narrative can be observed in the area immediately surrounding the site. However, it is still useful for understanding the wider context of the appeal site. The Appellant's LVIA includes relevant extracts from the key characteristics listed within the NCA document. However, the LVIA does not refer to the Statements of Environmental Opportunity (SEO) identified for the area. These are listed below:

- SEO 1: Maintain and enhance the character of this gently undulating, rural landscape by maintaining agricultural productivity and encouraging sustainable land management practices that protect and enhance the landscape, geodiversity and biodiversity assets and benefit carbon storage and water quality, as well as the overriding sense of place.
- SEO 3: Enhance the slow-flowing, winding rivers and their pastoral valley flood plains that provide linkages through the landscape, including redundant sand and gravel

extraction sites, for their ecological, historical and recreational importance. This will support the operation of natural processes and their contribution to biodiversity, geodiversity, soil quality, water availability, regulating water flow and the character of the area.

4.2.4 East Herts District Landscape Character Assessment 2007 (C.D. 15.2)

This local character assessment builds upon initial work produced for a county-scale assessment, commissioned by Hertfordshire County Council. The original report, 'A Landscape Strategy for Hertfordshire', provided a strategic level study of six existing landscape character regions across the county. The Landscape Partnership then expanded upon this work in phases to provide more detailed assessments of local character areas.

4.2.5 In 2007, information was compiled into the EHDC Supplementary Planning Document (SPD) 'Landscape Character Assessment'. Within this report, the site sits within two identified character areas. The northern section is shown within Area 141, the Cherry Green Arable Plateau, and the southern section is within Area 142 the High Rib Valley.

4.2.6 Area 141 Cherry Green Arable Plateau

With regards to Area 141, the Appellant's LVIA includes all of the relevant key characteristics listed in the LCA. The LVIA is also correct to highlight an extract from the 'Visual Impact' section of the LCA, "The major visual impact on the area comes from the perimeter of Buntingford with significant impact arising from both industrial and residential developments on the upper slopes of the Rib Valley".

4.2.7 However, the LVIA does not draw attention to description under the subtitle 'Visual and Sensory Perception' which states, "The plateau landscape is visible from both the neighbouring plateaux and the upper slopes of the Rib Valley. There are extensive views within the area and the scale of the area is large with exposed views. As a result it is visually sensitive to changes in built form. The area mainly has a quiet and remote feel apart from where locally closer to the A507 and the A10 corridor" (Page 206).

4.2.8 The submitted LVIA correctly references the stated condition of the Cherry Green Arable Plateau to be 'poor', the strength of character to be 'moderate', and the and the overall

landscape strategy to be 'improve and restore'. Whilst the LVIA includes most of the relevant strategy and guidelines for managing change, it omits the following point:

- Ensure that the surroundings of converted and new buildings are designed and maintained to be in keeping with their agricultural surroundings by ensuring that hard landscape and Garden details are screened from view where possible and native species are used for hedging and tree planting to the perimeter.

4.2.9 Area 142 High Rib Valley

The general description of landscape character in the High Rib Valley states that "The area is effectively divided into two sub areas by Buntingford which initially developed along the Ermine Street corridor, but in the 20th century has spread up the valley sides" (Page 208). The Appellant's LVIA references some of the key characteristics from the study with the following notable omissions that are relevant to the appeal site and surroundings:

- mixed land use including arable and pasture
- historic villages to valley edge at Westmill and Aspenden (Page 208)

4.2.10 The LVIA is right to note the landscape condition was stated to be 'moderate', with the strength of character also given a rating of 'moderate'. The overall landscape strategy for the character area is 'improve and restore'.

4.2.11 Relevant extracts not referenced within the LVIA include:

- To the fringes of Buntingford the land use is more fragmented and smaller in scale. There are limited areas of scrub, mainly around Buntingford (under the sub-heading of land cover and land use)
- The developing verges of the A10 bypass at Buntingford are becoming more important (under the sub-heading of vegetation and wildlife)
- The area is exceptional for its well preserved field systems and parklands. There are a few small blocks of pre-18th century common arable and meadow pasture, now superseded by 19th century enclosure, and later 20th century prairie fields, particularly around the bypass. However the greater part of the area comprises the

post-medieval or earlier informal parklands surrounding Corney Bury and Aspenden Hall (under the sub-heading of field patterns).

- Aspenden nestles in a tributary valley to the Rib and is largely contained by mature trees and hedges. Aspenden Brook runs through the village and a number of properties are accessed by bridges across the stream (under the sub-heading settlements and built form)
- This valley area is dominated by the urban settlement of Buntingford (under the sub-heading of historical and cultural influences)
- The valley landscape is locally visible from outside the area from the adjacent plateaux edges. Within the area there is a small to medium scale with contained views and a coherent though at times diverse character. Riverside vegetation and the presence of livestock grazing helps to highlight the line of the watercourses and meadows. The A10 follows and cuts through the area and brings visual and audible distraction (under the sub-heading of visual and sensory perception)
- The valley landscape is fairly unusual in the county. The villages of Westmill and Aspenden and the riverside parkland at Corney Bury are the most distinctive features (under the sub-heading of rarity and distinctiveness)
- There are a number of visual impacts on the area. These originate from the fact the river valley has also developed as a transport corridor. The most extensive visual impact comes from the adjacent residential developments, which in some cases lie adjacent and unscreened e.g. northern edge of Buntingford overlooking Corney Bury. The A10 is also locally intrusive, but contains sections in cutting. The slab detailing to the eastern verge south of the town is visually jarring (under the sub-heading of visual impact)

4.2.12 The Appellant's LVIA includes some extracts of the strategy and guidelines for managing change. However, one relevant extract is missing:

- Traffic calming measures, where considered necessary, must be of a scale and design that relates to the local the landscape character of the settlement. The use of

unsympathetic materials, such as concrete paviers, coloured concrete and brightly coloured road markings should be avoided and kerbing should be kept to a minimum.

4.2.13 Buntingford Community Area Neighbourhood Plan 2014-2031 (C.D 4.3)

Appendix 1 of the Buntingford Community Area Neighbourhood Plan (BCANP) provides an overview of the landscape setting to Buntingford and highlights potential sensitivity to expansion of the existing settlement. The document states, "This appendix aims to illustrate, by reproducing a series of wide angle views, the extent to which Buntingford sits within the Rib Valley and has impinged very little on the highly valued local landscape - to the benefit of all" (Page 65).

4.2.14 In a section titled 'Views of Buntingford from the Surrounding Countryside', the BCANP provides nine illustrative photo viewpoints labelled A to I. Each photo shows a view towards the main settlement area from the wider countryside. The report refers to the appeal site as the 'Proposed Bovis Development' and identifies potential visibility from viewpoints D, high ground to the east of Buntingford, and E, along the A10 road to the south. The accompanying discussion states, "The views from sites D and E in particular show the area between Buntingford and the A10 bypass that is being proposed by Bovis for further housing. It is quite clear from these views that such housing, which would be on land that rises to above 115 metres above sea level, would impinge significantly on the landscape to the detriment of the local area's natural beauty. Such development would be on land rising several metres higher in places than that on which the highest level of development at Longmead" (Page 71).

4.2.15 The Appellant's LVIA correctly references appropriate sections from the BCANP. Visibility of the appeal site within the wider countryside is further discussed in Section 6 of this proof.

4.2.16 East Herts Strategic Land Availability Assessment 2017 (C.D 5.5)

The appeal site is identified as site 02/005 within the Strategic Land Availability Assessment (SLAA). In the methodology section, the report explains that impact on landscape and character are taken into account when considering the suitability of a site for potential development. The methodology section also emphasises, "It is important to note that the

SLAA assesses whether a site **could** come forward for development, not whether it **should**" (Para 2.5, emphasis from original report).

- 4.2.17 Site 02/005 was judged to not be suitable for up to 400 dwellings, with the reasoning stating, "This large greenfield site is located within the Rural Area Beyond the Green Belt, between the existing urban area and the A10. The site is well related to the existing settlement and any incursion into the countryside would be limited by the presence of the A10 which would form the western boundary of the site. While the site could be considered developable subject to a review of the settlement boundary, the impact of a development of this size on existing infrastructure, and the ability to provide new services and facilities as part of the development, would need to be carefully considered. A planning application for 400 homes has been submitted" (Digital page 12).
- 4.2.18 It is not clear from the methodology how potential landscape and visual effects were considered when making this recommendation and GLVIA3 is not referenced at any point in the document.

4.3 Observed Landscape Character

- 4.3.1 The baseline landscape character studies and policy documents provide useful contextual descriptions and guidelines for development, with the site and surroundings displaying many of the key characteristics highlighted. However, to fully appreciate the existing character, it is also important for me to outline the additional characteristics I have observed during my site visits.
- 4.3.2 The appeal site comprises five agricultural fields of varying size on land to the west of Buntingford, covering approximately 28.95ha in total. The land is severed by the A10 carriageway, with the three fields proposed for residential and commercial development (Fields A, B, and C) situated on the east of the road and two fields retained for agriculture and ecological enhancement located to the west. Each of the five fields are in use for arable production, with topography varying from c.125m to 90m AOD, generally sloping down from north-west to south-east.

- 4.3.3 The predominantly undeveloped nature of the site itself contrasts with the adjacent Buntingford settlement edge. Field A has an elongated rectangular shape and is bound to the west by an established tree line adjacent to the A10. The arable land has an open character, which can be experienced from Footpath 029 as it diagonally crosses the field. Valuable views to the wider countryside south of the site are possible from higher ground towards the west of Field A, with the footpath providing a pleasant transition from the settlement edge out into the landscape to the west.
- 4.3.4 Field B is also open arable land bound by established vegetation along the A10 to the west. A small portion of the southern area of the field is in use for the storage of materials and machinery. This has an element of hardstanding and is generally triangular in shape. Whilst not representing a land use that is incongruous with agriculture, this part of the site does not add to the visual attractiveness of the area. However, as the planning permission for this part of the site is temporary, there is potential for the area to be returned to arable production. Footpath 026 also crosses Field B, providing a link to the wider public right of way (PRoW) network south of the site.
- 4.3.5 Field C is broadly square in shape, bound by housing along Knights Close and Barleycroft to the north, with the Watermill Industrial Estate to the east and sewage works to the south. Varying levels of existing boundary vegetation separate arable land in the field from surrounding built form, but the character is slightly less open than Fields A and B.
- 4.3.6 The two irregular shaped fields on the western side of the A10 seem isolated from the appeal site due to the separation afforded by the busy road. Both fields are in use for arable production and have a consistent tree and hedgerow boundary. West of this, the landscape is overwhelmingly rural, with attractive views across parkland sloping down to Aspenden Hall. A triangular woodland, known as The Thicket, is locally prominent on raised topography.

4.4 Landscape Receptors

- 4.4.1 GLVIA3 defines landscape receptors as components of the landscape that are likely to be affected by the proposed development, such as “overall character and key characteristics, individual elements or features, and specific aesthetic or perceptual aspects” (Page 86, paragraph 5.34).

4.4.2 Relating to this appeal, I consider the landscape receptors to be:

- The character of the site itself
- The character of the Buntingford settlement edge
- The character of LCA Area 141 Cherry Green Arable Plateau
- The character of LCA Area 142 High Rib Valley

4.4.3 The Appellant's LVIA identifies a similar list of landscape receptors. The main difference being that the LVIA does not identify the Buntingford settlement edge as a distinct receptor, but instead combines the 'site itself and immediate surroundings' to form one receptor. This is defined as the area within the visual envelope as shown on Figure 3 of the LVIA (between pages 59-60). I disagree with this approach, as it suggests that an area measuring approximately 4km from east to west and 5km from north to south has a similar character and would experience landscape change in the same way as a result of the proposals. This offers a less thorough approach and makes it difficult to directly compare findings.

4.4.4 However, I do agree with the LVIA that any change to National Character Area 86 would be negligible in the context of such a large area. I have therefore not included the South Suffolk and North Essex Clayland as a landscape receptor.

4.5 My Assessment of Landscape Value

4.5.1 To assess the value of the appeal site and surrounding landscape, I have used the latest guidance from the Landscape Institute, TGN 02-21: Assessing Landscape Value Outside National Designations (C.D 15.1).

4.5.2 The technical note stresses that: "When assessing landscape value of a site as part of a planning application or appeal it is important to consider not only the site itself and its features/elements/characteristics/qualities, but also their relationship with, and the role they play within, the site's context" (paragraph 2.4.5 Table 1 notes).

4.5.3 Below I have assessed the site and surroundings against the indicators of landscape value identified in TGN 02-21:

4.5.4 Natural Heritage

The site itself does not display clear evidence of ecological, geological, geomorphological, or physiographic interest. However, the River Rib stream corridor will have local natural capital value away from the channelised section that runs through Buntingford, contributing to a wider green infrastructure network. The same is true of the Thistley Vale Brook and adjacent Westminster Pond, situated close to Aspenden.

4.5.5 Cultural Heritage

The settlement of Buntingford displays clear evidence of historical interest including many listed buildings within its Conservation Area, situated approximately 160m from the appeal site boundary at the closest point. Grade II Listed Aspenden Hall lies 500m west of the appeal site, with its listing describing it as an “important landscape feature and part of setting of parish church”. This refers to the Grade I Listed Parish Church of St Mary located nearby. The expansive parkland associated with Aspenden Hall and the hall itself act to provide a sense of time depth in the landscape.

4.5.6 Landscape Condition

The appeal site is in moderate physical condition, with some areas showing signs of active landscape management. Existing hedgerows across the site are gappy in places, but are mostly intact. The wider rural landscape to the west of the A10 is generally in good condition. Some of the back garden boundaries along the eastern boundary of the site are in poor condition, showing signs of damaged fencing and minimal vegetation management.

4.5.7 Associations

Aspenden Hall was home to Ralph Freman, the MP for Hertfordshire from 1697 to 1727. I can find no other evidence of associations between notable people, events, or the arts and the appeal site or surroundings.

4.5.8 Distinctiveness

As outlined previously, the site and surroundings display multiple elements of the characteristics highlighted in the local and regional landscape character assessments. In

addition, the site makes a contribution to the rural setting and distinctive character of Buntingford.

4.5.9 Recreational

There is direct public access across the appeal site in the form of two public footpath routes. Buntingford Footpath 029 passes through existing properties along Monks Walk east of the appeal site, then crosses diagonally through Field A and over a raised footbridge into parkland close to Aspenden Hall in the west. The route becomes Aspenden Footpath 001 for a short section in the retained northern field west of the A10.

4.5.10 Buntingford Footpath 026 provides access to the appeal site from Knights Close, entering the north-eastern corner of Field B and traversing diagonally to the A10 boundary. There is a gap in boundary vegetation that allows walkers to cross both lanes of the single carriageway and into the retained southern field west of the A10. After crossing the road, the route becomes Aspenden Footpath 002 and links to the wider PRow network south-west of the appeal site.

4.5.11 Each route shows signs of regular use, offering instant access from existing suburban areas out into the surrounding rural landscape and are considered to be a valuable recreational asset.

4.5.12 Perceptual (Scenic)

The site itself has many pleasant aesthetic elements that can be experienced from the footpaths traversing the land. The route through Field A offers longer distance views from raised topography to the rural areas surrounding Buntingford. Views from Footpath 001, at the western edge of the site, are particularly scenic through parkland towards Aspenden Hall.

4.5.13 Perceptual (Wildness and Tranquillity)

The rural landscape of the appeal site and surroundings displays many signs of human management in the form of agriculture and parkland maintenance, it therefore cannot be described as wild. However, many of the PRowS in the area offer a strong sense of tranquillity. This is intruded upon in places by traffic noise from the A10.

4.5.14 Functional

Woodland clusters, boundary trees, and existing hedgerows make a contribution to the healthy functioning of the landscape, offering considerable green infrastructure and visual amenity. Much of the appeal site also provides an important function as productive arable land.

- 4.5.15 The appeal site also provides a buffering function between the suburban settlement area of Buntingford and the more sensitive parkland landscape around Aspenden Hall to the west. The arable land also buffers the settlement from the intrusive A10.

4.5.16 Summary assessment of landscape value

The Appellant's LVIA references TGN 02-21: Assessing Landscape Value Outside National Designations, the latest guidance on assessing landscape value. However, the report mainly relies on factors outlined in Box 5.1 of GLVIA3. Whilst this approach is somewhat outdated, it can still provide some useful considerations of value. Nevertheless, the LVIA methodology does provide an acceptable descriptive scale for assessing landscape value in Table 3 of its methodology.

- 4.5.17 Considering the elements of value outlined above and using the descriptive scale included within the Appellant's LVIA methodology, I assess the site itself to hold medium landscape value. Although the site itself does not hold any national landscape designations, it forms an important part of the character setting to Buntingford and a functional buffer between the settlement, the A10, and sensitive parkland to the west.

- 4.5.18 I do not consider it as a 'valued landscape' for the purpose of NPPF Paragraph 180(a). However, it is important to stress the value that local people place on the appeal site. This is illustrated by the considerable number of objections raised by local residents.

- 4.5.19 The Buntingford settlement edge along the eastern boundary of the site displays fewer elements of landscape value and is generally in poorer condition than the appeal site or other landscape receptors. I therefore assess the character of the settlement edge to hold medium to low landscape value.

4.5.20 There are many strong elements of landscape character identified within the separate baseline studies for LCA areas 141 (Cherry Green Arable Plateau) and 142 (High Rib Valley), as well as more local elements highlighted in my appraisal. However, the condition of LCA 141 is stated to be lower than LCA 142. I therefore assess LCA Area 141 to hold medium landscape value, with LCA Area 142 holding medium to high landscape value.

4.5.21 Despite not fully utilising TGN 02-21, the Appellant's LVIA assesses landscape value of the site and surroundings to be low to medium. There are no other comparable value assessments offered for the two landscape character areas and, as previously explained, the LVIA does not identify the Buntingford settlement edge as a separate landscape receptor.

4.6 Susceptibility to Change and Character Sensitivity

4.6.1 GLVIA3 defines susceptibility to change as 'ability of the landscape receptor to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies' (pages 88 and 89 para 5.40).

4.6.2 From review of the baseline landscape character assessments and my own fieldwork observations, I consider the susceptibility of identified landscape receptors to the appeal scheme below. Each rating uses the definitions from Table 4 of the Appellant's LVIA methodology:

- The site itself – medium susceptibility
- The Buntingford settlement edge – medium susceptibility
- LCA Area 141 Cherry Green Arable Plateau – medium to high susceptibility
- LCA Area 142 High Rib Valley – medium to high susceptibility

4.6.3 The character susceptibility of the appeal site is affected by its proximity to existing residential development along the eastern boundary and the Watermill Industrial Estate to the south-east. This does introduce a degree of suburban character influence to a portion of the site. The A10 corridor also intrudes to a degree. However, the agricultural land use, considerable change in topography, prominent boundary tree line, and general lack of built development on the site itself give the land a rural character. This is particularly apparent in

the two fields west of the A10. I have also highlighted the role that the site performs as a countryside buffer between Buntingford and more sensitive parkland towards the west. These finely balanced elements are vulnerable to the introduction of development on the scale proposed by the appeal scheme, which would cause a considerable change in the landscape baseline. With this in mind, it is necessary to assess the susceptibility of the site itself as medium.

- 4.6.4 The general poorer condition of the Buntingford settlement edge and prominence of existing suburban development are a consideration in the susceptibility of the settlement edge to the appeal proposals. However, the direct proximity of the appeal site and the current role it plays in providing a rural setting to the town must also be taken into account. I therefore assess the Buntingford settlement edge to hold medium susceptibility to character change.
- 4.6.5 Landscape character documents for LCA areas 141 and 142 afford slightly different assessments of landscape condition and highlight slightly different key characteristics. Nevertheless, it is my opinion that the wider character areas are similarly susceptible to the proposed development. The overwhelmingly rural character of the landscape west of the A10 is still considerably contrasting to the appeal proposals and the scheme has the potential to undermine this at a local level. Therefore, I assess the susceptibility of LCA areas 141 and 142 to be medium to high.
- 4.6.6 GLVIA3 explains that the process for assessing landscape sensitivity requires a combined judgement of susceptibility and value. I assessed the landscape value of each receptor in Section 4.5 of this proof. Below I have combined the value and susceptibility assessments for each receptor to give a sensitivity assessment. Using the descriptors in Table 5 of the Appellant's LVIA, I have also applied professional judgement to determine the correct sensitivity rating for each receptor:
- The site itself – medium sensitivity
 - The Buntingford settlement edge – medium sensitivity
 - LCA Area 141 Cherry Green Arable Plateau – medium to high sensitivity
 - LCA Area 142 High Rib Valley – medium to high sensitivity

- 4.6.7 The Appellant's LVIA assesses the site and surroundings to hold medium landscape susceptibility. When combined with a previous assessment of low to medium landscape value, the LVIA judges the area to hold medium sensitivity. This represents a good level of agreement between the parties. I also agree with the justification provided within the LVIA which states, "there would be some loss of landscape features (chiefly the open fields which make up the site, though some new landscape features would be provided), and the development would represent a significant change to what is at the moment a largely open, agricultural landscape" (Page 40, para 2.4.6).
- 4.6.8 The LVIA does not comment specifically on the susceptibility and sensitivity of the wider landscape character areas.

5 Landscape Effects of the Proposals

5.1 Introduction

- 5.1.1 In this section, I consider the landscape character effects of the appeal proposals on the site and surrounding area.

5.2 Magnitude of Landscape Effects

- 5.2.1 I have reviewed the relevant submitted drawings, statements, and strategies that detail the proposed appeal scheme. Outlined below are predicted key changes to the landscape as a resource and also elements of identified landscape character.
- 5.2.2 The proposals represent a considerable reduction in the agricultural land which forms a rural setting to the western edge of Buntingford, with largely undeveloped arable fields replaced by intrusive built form and associated infrastructure. This would equate to the local loss of a key landscape characteristic and would be detrimental to the character of the settlement edge. The introduction of hundreds of dwellings, commercial buildings and associated infrastructure would considerably expand the suburban built influence on the area. This will be directly perceived from the two public footpaths crossing Fields A and B. Whilst the proposals indicate an approximate 13m offset either side of Footpath 029, running through Field A, there is little to no offset shown from Footpath 026 in Field B. In either case, the

perceptual and aesthetic experience of recreational footpath users will be adversely affected. The character buffer function that the site currently performs will also be compromised.

- 5.2.3 Considering the amount of topographic change present across the site, the proposals will require a substantial amount of modification to existing site levels to make the development viable. In addition to this, a bund is also proposed along the western boundary of the site. This represents another sizable change to the landform of the site itself. Whilst the specific details of level changes would not be known until later design stages, it is possible to conclude that the proposals will not be possible without a large amount of land movement and retaining features. It is difficult to assess this further due to the surprising omission of a topographic survey within the original application or appeal submission.
- 5.2.4 The appeal scheme indicates the requirement for a new roundabout to be built in order to facilitate access from the A10. This will lead to the removal of sections of existing boundary vegetation on both sides of the A10 and the requirement for vision splays may limit replacement planting in that part of the site. The new opening in boundary vegetation will allow road users to further perceive the change in baseline character and appreciate the extension of suburban land use into the countryside.
- 5.2.5 A separate temporary access to the site from the A10 is also likely to be needed away from the proposed roundabout, facilitating access for construction vehicles. This will require localised boundary vegetation removal leading to an element of short-term character erosion whilst replacement planting establishes.
- 5.2.6 The submitted LVIA and DAS outline the attempts that have been made to retain existing hedgerows and trees across the site where possible. The main vegetation removal will be from the A10 boundary to facilitate the new roundabout and vision splays, but also a short section of hedgerow between Fields A and B, as well as B and C, will be required to make way for estate roads. The illustrative layout shows a series of 'green corridors' which contain a mixture of retained vegetation as well as proposed tree and hedgerow planting. A linear park is proposed along the corridor of Footpath 029 in Field A, with a neighbourhood equipped area of play (NEAP) indicated close to a new Local Centre in Field B. There is also

provision for allotments in the north-eastern corner of Field A and multiple areas of wildflower meadow. These features represent a beneficial landscape effect in places.

5.2.7 When considering the magnitude of landscape effects, GLVIA3 states that effects should be assessed in terms of size or scale, the geographical extent of the area influenced, and its duration and reversibility (para 5.48, page 90). Each element is considered below.

5.2.8 Size or scale

The overall application area of the site is stated to be 28.95ha in the submitted DAS. Excluding the 7.85ha of retained farmland to the west of the A10, the appeal scheme proposes that 21.1ha of land within Fields A, B, and C will change from agricultural use to residential development and associated green infrastructure. This will include significant change in the form of building footprints, hard surfacing, or as residential garden space, and represents a considerable alteration away from the baseline landscape elements of the site. Heights for residential buildings in Field A are indicated to be up to 10.5m, with residential buildings in Fields B and C up to 13.5m. The Local Centre is also proposed to stand up to 13.5m tall, with employment buildings rising up to 15m in height.

5.2.9 Geographical extent

Within the site itself landscape effects will be significant, with a considerable alteration from the baseline characteristics across the full site. In terms of the immediate surroundings, there will be a notable change in the character of the Buntingford settlement edge, further eroding the rural setting to the west of the town. Landscape effects will be restricted to a local level, however, with limited effects on the wider Cherry Green Arable Plateau and High Rib Valley as a whole. I agree that there would be “no significant effects beyond the area of the visual envelope shown in Figure 3” within the submitted LVIA (between Pages 58 and 59).

5.2.10 Duration and reversibility

5.2.11 The predicted landscape effects will be permanent and irreversible. Effects will be amplified during construction due to the increase in activity and the temporary presence of uncharacteristic machinery and stockpiles of materials, as well as the temporary additional access point.

5.2.12 Using the descriptors from Table 1 the Appellant’s LVIA, I have summarised my predicted magnitude of landscape effects on each identified receptor below.

Table 1: Magnitude of Landscape Effects

		Assessment timeframe		
		During construction	At Year 1	15 Years following completion
Landscape Receptor	Site itself	High	High	High to Medium
	Buntingford settlement edge	High	High	High to Medium
	LCA Area 141 Cherry Green Arable Plateau	Medium	Low	Low
	LCA Area 142 High Rib Valley	Medium	Low	Low

5.2.13 The Appellant’s LVIA assesses the magnitude of landscape change to be medium for the site and surroundings. It is my opinion that this underestimates the widespread loss of key characteristics across the site. There is agreement that a low level of change is predicted for the wider Cherry Green Arable Plateau and High Rib Valley character areas at completion.

5.3 Significance of Landscape Effects

5.3.1 The table below summarises my significance of landscape effect assessments for identified receptors across varying temporal scales. This is based upon the descriptors given in Table 6 of the Appellant’s LVIA methodology. Assessments combine an understanding of the sensitivity of each receptor to the proposals with the predicted magnitude of change.

Table 2: Significance of Landscape Effects

		Landscape sensitivity	Assessment timeframe		
			During construction	At Year 1	15 Years following completion
Landscape Receptor	Site itself	Medium	High adverse	High adverse	High to Moderate adverse
	Buntingford settlement edge	Medium	High adverse	High adverse	High to Moderate adverse
	LCA Area 141 Cherry Green Arable Plateau	Medium to High	Moderate adverse	Slight adverse	Slight adverse
	LCA Area 142 High Rib Valley	Medium to High	Moderate adverse	Slight adverse	Slight adverse

5.3.2 For the site and surroundings, the Appellant’s LVIA assesses a moderate adverse effect at Year 1, with the prediction reducing to a slight to moderate adverse level by Year 10. It is my opinion that this underestimates the level of effect at Year 1 and overestimates the effect of mitigation measures by Year 15. A predicted level of slight adverse effects is agreed for the wider Cherry Green Arable Plateau and High Rib Valley by Year 15.

5.3.3 My colleague Vic Hester deals primarily with planning policy. However, when considering these assessments of landscape effects against the relevant planning policy, it is my opinion that the appeal scheme conflicts with both local and national policy. The proposals do not conserve, enhance or strengthen the character of the site and surrounding area, placing the scheme in conflict with Local Plan Policies DES2, DES4 and BCANP Policy HD4. The appeal scheme does not protect and enhance existing landscape features, nor does it maintain the Rib Valley setting of the Buntingford Community Area, placing it at odds with Local Plan Policy DES3 and BCANP Policy ES1. By failing to be sympathetic to the local character and landscape setting, the appeal scheme is in conflict with NPPF Paragraph 135, sub-section C,

and BCANP Policy HD2. In addition, the proposals do not recognise the intrinsic character and beauty of the countryside as required by NPPF Paragraph 180, sub-section B, as well as BCANP Policy BE2.

6 Visual Effects of the Proposals

6.1 Introduction

6.1.1 In this section, I examine the potential visual effects of the appeal proposals. I visited the site in May and June 2024 to make my own observations and carry out my own visual impact assessment in accordance with GLVIA3.

6.2 Receptors and Visual Sensitivity

6.2.1 When considering the sensitivity of visual receptors, GLVIA 3 states:

“It is important to remember at the outset that visual receptors are all people. Each visual receptor, meaning the particular person or group of people likely to be affected at a specific viewpoint, should be assessed in terms of both their susceptibility to change in views and visual amenity and also the value attached to particular views” (Page 113, paragraph 6.31).

6.2.2 It continues to identify visual receptors most sensitive to change as being:

- Residents at home
- People engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focused on the landscape
- Visitors to heritage assets where views of the surroundings are an important contributor to the experience
- Communities where views contribute to the landscape setting enjoyed by residents in the area

6.2.3 The guidance states that “travellers on road, rail or other transport routes tend to fall into an intermediate category”.

6.2.4 GLVIA3 identifies less sensitive receptors to be (para 6.34, page 114):

- People engaged in outdoor sport or recreation which does not involve or depend upon appreciation of views of the landscape
- People at work

6.2.5 Following my own site visits and using the descriptors in Table 8 of the Appellant's LVIA methodology, the receptors with high sensitivity to visual effects of the appeal scheme are:

- Residents at home along the boundary of the site
- People using Buntingford Footpath 029 crossing Field A
- People using Buntingford Footpath 026 crossing Field B
- People using PRow in the wider landscape

6.2.6 Receptors judged to hold low sensitivity to visual effects of the appeal scheme are:

- People in vehicles along the A10

6.2.7 There are no visual receptors identified in the medium sensitivity category.

6.2.8 I visited all 43no. viewpoints from the Appellant's LVIA, as well as some additional areas in the wider landscape where I considered there to be potential for visibility. I agree that the appropriate visual envelope has been identified and assessed by the LVIA. Although viewpoint photography in the LVIA is not presented in accordance with the latest Landscape Institute guidance, TGN 06/19 Visual Representation of development proposals, and some photos are more than four years old, I am generally satisfied that they represent the views that I experienced during my site visits.

6.3 Magnitude and Significance of Visual Effects

6.3.1 Using the descriptors included within Table 7 of the Appellant's LVIA methodology, I have assessed the magnitude of change to identified visual receptors. I have also used Table 9 in the same methodology to assess the significance of visual effects on each receptor during construction (winter), at Year 1 (winter), and at 15 years post completion (summer). Once again, I have exercised professional judgement where necessary when applying the descriptor tables. A summary of visual effects on each receptor group is provided below.

6.3.2 Note 2 under Table 8 in the LVIA methodology states “There is some discussion in the GLVIA as to whether private views from residential properties should be included within an LVIA, as they are a private (rather than a public) interest, but they have been included in this assessment on the basis that they are likely to matter most to local people. The appropriate weight to be applied to such views can then be determined by the decision maker” (digital page 87). I agree with this approach and have assessed visual effects on private views from residential properties accordingly.

6.3.3 Visual effects on residents at home along the boundary of the site

I note that the Appellant’s LVIA methodology allows residential receptors to be classified as either medium or high sensitivity depending on the type of view available from their properties. I do not agree with this approach. It is my opinion that all residential receptors close to the appeal site are high sensitivity and that the different nature of each view should be accounted for when subsequently considering visual change and significance of visual effect.

6.3.4 Residents living on Longmead, along the northern boundary of the appeal site, will have open views southwards across the site from upper floor windows. Existing views will include open arable land in Field A, framed by vegetation along the A10 to the west and back gardens of housing along Monks Walk and Oak End to the east. There will also be longer distance views to countryside in the Cherry Green Arable Plateau and High Rib Valley in the south. The appeal scheme indicates up to two-storey housing close to the northern boundary of the site. This will cause a dominant deterioration in views for existing residents as open arable land is replaced by short-distance views to residential development. Longer distance views to the south are also likely to be largely obscured. This represents a high magnitude of visual change and a high adverse significance of effect. Visual effects will be more prominent during construction due to the presence of large machinery, construction hoarding, and stockpiles of topsoil and materials. Although mitigation planting will slightly soften the appearance of the new built development over time, the proximity of receptors to the site will mean that the appeal scheme will be permanently prominent within the view. Planting will also not mitigate the loss of longer views to the south. Therefore, high adverse effects are predicted to remain at Year 1 and by Year 15.

6.3.5 For residents with houses backing on to the appeal site along Monks Walk, Oak End, and parts of Meadow View, a similar level of change is predicted. As described in the Appellant's LVIA, some of these properties have minimal boundary fencing or vegetation and can currently enjoy open views across the site from ground level. Views westwards are across arable land in Field A with trees along the A10 providing screening and a wooded backdrop. For many of these residents, there are minimal elements of built form currently visible. The proposals indicate residential dwellings along most of the eastern boundary to Field A, with an area of allotments in the north-eastern corner and a break for the entrance to the linear park. The proximity and indicated density of new housing would lead to a major deterioration in the existing rural view. Whilst the allotments will offer a small visual break for select properties towards the northern end of Monks Walk, they will still introduce more suburban visual elements to the view. I assess the magnitude of change for this group of residents to be high, leading to high adverse effects. It is my opinion that mitigation measures will not reduce the significance of effect at Year 1 or by Year 15. Views to undeveloped arable land forming the setting of the town will be permanently lost.

6.3.6 Views from selected properties along Meadow View, Peasmead, Knights Close, and Barleycroft back on to the northern boundary of Fields B and C. Existing views southwards, predominantly from upper floor windows, contain large arable fields as well as more intrusive elements including the Watermill Industrial Estate, the sewage works, and the triangular storage area in Field B. The proposals include some open space and play provision within the north of Field B, as well as an attenuation basin along the east of Field C. This will provide some breaks in the intrusion of new built form. However, the proposed residential, commercial, and community use buildings will still present a medium to high magnitude of change. Visual effects are predicted to hold high adverse significance for this group of residents during construction, reducing to moderate to high adverse by Year 1 and through to Year 15.

6.3.7 Visual effects on people using Buntingford Footpath 029 crossing Field A

Existing visual amenity experienced by recreational users along Footpath 029 crossing Field A derives from open views across arable land, with some raised views to wider countryside providing scenic value. Less attractive views to housing along Longmead, Monks Walk, and

Oak End form part of the visual experience, particularly when people are walking back towards Buntingford and get closer to the eastern boundary of the site. However, the appeal scheme would transform rural views along the route to a narrower visual corridor within the suburban linear park. New housing would appear slightly set back, but still readily apparent in short-distance views and obscuring longer views southwards to the wider countryside. This would lead to a high magnitude of visual change and high adverse visual effects. It is my opinion that maturing vegetation within the linear park would not reduce effects enough to reduce the significance of effects by Year 15.

6.3.8 Visual effects on people using Buntingford Footpath 026 crossing Field B

Footpath 026, crossing Field B, also provides an opportunity for recreational users to experience pleasant rural views. Travelling south-westwards, the route includes views across arable land in Field B towards the western boundary tree line. The triangular storage area does partially intrude on this view and houses along Meadow View and Peasmead are visible when walking north-eastwards towards the town. The proposals indicate a high level of change very close to the footpath. New housing, car parking, and roads will completely alter the baseline visual experience, imposing suburban elements into short-distance views. This would lead to a high adverse visual effect, not reduced by any attempted mitigation measures.

6.3.9 Visual effects on people using PRoW in the wider landscape

Having walked along public rights of way on raised ground in the wider landscape, there is likely to be some long-distance visibility to the appeal scheme. This includes glimpsed views from Footpath Cottered 040 to the north, Restricted Byway Aspenden 010 to the west, Bridleway Westmill 007 to the south, and Bridleway Buntingford 022 to the east. The distance of the views, presence of existing development within the view, and partial screening from intervening vegetation, buildings, and topography would limit visual change to a low to negligible level. The development would make up a small portion of each view and would be seen in the context of other residential areas around Buntingford. This would lead to a slight to insignificant adverse significance of effect.

6.3.10 Whilst the LVIA does not name the same PRoW specifically, it does identify “Filtered views from relatively short stretches of the bridleway near Owls Farm, and possibly parts of other routes further to the north, at distances of 1.9km or greater” (Summary of Visual Effects table on digital Page 94). It assesses effects on these receptors to be insignificant.

6.3.11 Visual effects on people in vehicles along the A10

Visual change for people in vehicles along the A10 adjacent to the appeal site will be restricted by existing boundary vegetation, as well as the fact that people experiencing the views will be moving at a reasonable speed. Aspects of construction activity may be seen from vehicles leading to a medium level of change in places where vegetation is gappy. This represents a moderate to slight adverse significance of effect. This will reduce to a slight adverse effect by Year 15 following the establishment of planting indicated along the western boundary of the site. Nevertheless, there will be fleeting and filtered views through vegetation in the winter months. It will also be difficult to mitigate visual effects for motorists close to the proposed roundabout junction. Restrictions on planting within visibility splays will cause some more open views to built form within Field B.

6.3.12 The assessment of effects on people in vehicles along the A10 in the LVIA is broadly in line with my findings.

6.3.13 Summary of visual effects

Although the proof of Vic Hester deals primarily with planning policy, I have considered my assessment of visual effects against the relevant local and national policy. The identified level of visual effects feeds directly into the aesthetic aspects of character harm discussed within Section 5. Direct visual effects further demonstrate the failure of the scheme to conserve, enhance or strengthen the character of the site and surrounding area, conflicting with Local Plan Policies DES2, DES4 and BCANP Policy HD4. Visual effects on residents and footpath users do not suggest a good illustrative layout or appropriate landscaping, placing the scheme at conflict with NPPF Paragraph 135, sub-section B, and Local Plan Policy HOU2, as well as BCANP Policy HD2. Visual effects arising from the extension of Watermill Industrial Estate would adversely affect the attractiveness of the local countryside contrary to BCANP Policy BE2.

7 Proposed Housing Density

- 7.1.1 Parameter Plan 4: Density & Building Heights included within the application indicates densities of up to 30 dwellings per hectare for Field A, with up to 40 dwellings per hectare proposed for Fields B and C. Page 26 of the Design & Access Statement also includes an assessment of existing housing densities on developments within the vicinity of the site. The general conclusion of the narrative is that the proposals are similar to existing densities and are therefore suitable for the site. I disagree with this assertion. One of the current functions of the site is to provide a gradual transition from the suburban edge of Buntingford out into the wider, distinctly rural, surrounding landscape. Replicating, or in places slightly increasing, densities to match adjacent developments does not reflect this transition and fails to respect the character of the site and surroundings.
- 7.1.2 The illustrative layout plan and parameter plans appear to rely on dense residential areas to achieve the quantum of development. Areas of proposed open space are restricted to linear parcels around the outside of large residential clusters and another linear park along the route of Footpath 029. There does not appear to be enough space to accommodate the buffers required along the A10 and the sheer volume of proposed development without relying on narrow areas of open space.
- 7.1.3 The creation of a series of very similar constricted spaces does not adhere to recommendations within the National Design Guide (C.D 20.11). Paragraph 92 states green open spaces should take into account “the balance between public and private” as well as “support a range of activities and provide amenity value” (Page 27). Paragraph 94 goes further to state that open spaces should have “a range of sizes and locations”. The proposed layout indicates open space that would support a limited range of recreational opportunities, without the room for activities requiring more expansive space such as ball games. The type of space proposed also lacks variety, with a considerable amount of repetitive design. In addition, confining open spaces to the edges of residential areas and a transitional linear park does not achieve a balance between public and private amenity. The illustrative layout represents a missed opportunity for open space to be integrated into residential areas, failing to achieve an important element of successful placemaking. Better integration of

open space could also act to improve the perceived transition from the suburban edge of Buntingford out into the surrounding countryside. However, the parameter plans have failed to demonstrate how this can be achieved whilst maintaining the quantum of proposed development.

- 7.1.4 It is therefore my opinion that the appeal scheme does not demonstrate how the proposed density of development has been informed by the character of the local area. Whilst the DAS concentrates on identifying the similarities between the proposed density and existing residential areas in the vicinity, the scheme does not reflect the necessary transition from suburban to rural landscape character. Failure to incorporate a more open character informed by the existing site and surroundings is a missed opportunity and places the scheme in conflict with Local Plan Policy HOU2.

8 Conclusion and Summary

- 8.1.1 The appeal is against refusal of planning permission for a "Outline planning application (with all matters reserved except for access) for up to 350 dwellings, up to 4,400 sqm of commercial and services floorspace (Use Class E and B8), and up to 500 sqm of retail floorspace (Use Classes E) and other associated works including drainage, access into the site from the A10 and Luyne Rise (but not access within the site), allotments, public open space and landscaping". The site is located on Land East off the A10 Buntingford, Hertfordshire, is currently undeveloped and is in use for agriculture. Planning permission for the scheme was refused for five reasons, with this evidence relating to Reasons 1 and 3 only.
- 8.1.2 I was appointed by East Hertfordshire District Council in May 2024 to prepare evidence for this Inquiry. I have reviewed the relevant application documents and applicable policy documents, and I have made multiple site visits to appraise the appeal site and its environs in terms of landscape character and visual impact. My evidence provides my professional opinion on the potential effects of the appeal scheme on the existing landscape character and appearance. My methodology adheres to guidance set out in GLVIA3, as well as Landscape Institute TGN 02-21.
- 8.1.3 I have established the planning context for the appeal by identifying the relevant national and local planning policies. My evidence also considers the relevant baseline landscape

character documents ranging from a national to a local scale, as well as character observations made on site. It is my opinion that the area displays many of the characteristics identified within the baseline studies, in particular the local landscape character assessment. I have identified the relevant landscape receptors to the appeal scheme and assess the site itself to hold medium susceptibility, the Buntingford settlement edge to hold medium susceptibility, and the wider local character areas 141 Cherry Garden Arable Plateau and 142 High Rib Valley to hold a medium to high susceptibility to change.

8.1.4 Using Landscape Institute TGN 02-21, I have assessed the landscape value of the site and surroundings. Although the site itself does not hold any national landscape designations, it forms an important part of the character setting to Buntingford and a functional buffer between the settlement, the A10, and sensitive parkland to the west. However, I do not consider it as a 'valued landscape' for the purpose of NPPF Paragraph 180(a).

8.1.5 For each receptor I have assessed the sensitivity to the appeal proposals by combining the identified landscape value and susceptibility. The site itself and Buntingford settlement edge were assessed to hold medium sensitivity, with medium to high sensitivity assessed for the two adjacent local character areas.

8.1.6 I have considered the predicted magnitude and significance of landscape change that would result from the appeal scheme. The proposals represent a considerable reduction in the agricultural land which forms a rural setting to the western edge of Buntingford, with largely undeveloped arable fields replaced by intrusive built form and associated infrastructure. This would equate to the local loss of a key landscape characteristic and would be detrimental to the character of the settlement edge. The introduction of hundreds of dwellings, commercial buildings and associated infrastructure would considerably expand the suburban built influence on the area. Within the site itself landscape effects will be significant, with a considerable alteration from the baseline characteristics across the full site. In terms of the immediate surroundings, there will be a notable change in the character of the Buntingford settlement edge, further eroding the rural setting to the west of the town. Landscape effects will be restricted to a local level, however, with limited effects on the wider Cherry Green Arable Plateau and High Rib Valley as a whole. The predicted landscape effects will be permanent and irreversible. Effects will be amplified during construction due to the

increase in activity and the temporary presence of uncharacteristic machinery and stockpiles of materials, as well as the temporary additional access point.

- 8.1.7 By Year 15, the significance of landscape effects was assessed to be high to moderate adverse for the site itself and Buntingford settlement edge, with slight adverse effects assessed for Area 141 Cherry Garden Arable Plateau and Area 142 High Rib Valley.
- 8.1.8 When considering visual effects of the appeal scheme, there is disagreement on the level and significance of visual effect to receptors. It is my opinion that the Appellant's LVIA underestimates the predicted visual effects of the appeal scheme and overestimates the effectiveness of proposed mitigation. I predict high adverse visual effects on residents at home along Longmead, Monks Walk, Oak End, and parts of Meadow View with properties along the boundaries of Fields A and B. From these properties, the proximity and indicated density of new housing would lead to a major deterioration in the existing rural view. It is my opinion that mitigation measures will not reduce the significance of effect at Year 1 or by Year 15. Views to undeveloped arable land forming the setting of the town will be permanently lost.
- 8.1.9 High adverse visual effects are also predicted for selected properties along Meadow View, Peasmead, Knights Close, and Barleycroft that back on to the northern boundary of Fields B and C. Existing views southwards, predominantly from upper floor windows, contain large arable fields as well as more intrusive elements including the Watermill Industrial Estate, the sewage works, and the triangular storage area in Field B. Nevertheless, proposed residential, commercial, and community use buildings will still present a medium to high magnitude of change. After the disruption of the construction phase, visual effects on these receptors will reduce to moderate to high adverse by Year 1 and through to Year 15.
- 8.1.10 For people using Footpath 029 crossing Field A, the appeal scheme would transform rural views along the route to a narrower visual corridor within a suburban linear park. New housing would appear slightly set back, but still readily apparent in short-distance views and obscuring longer views southwards to the wider countryside. This would lead to a high magnitude of visual change and high adverse visual effects. It is my opinion that maturing

vegetation within the linear park would not reduce effects enough to reduce the significance of effects by Year 15.

- 8.1.11 Users of Footpath 026 traversing Field B would also experience a high level of visual change, with proposed development very close to the route. New housing, car parking, and roads will completely alter the baseline visual experience, imposing suburban elements into short-distance views. This would lead to a high adverse visual effect, not reduced by any attempted mitigation measures.
- 8.1.12 Whilst the appeal scheme is likely to be visible from raised ground within the wider landscape, visual effects on people using surrounding public rights of way will be limited due to the distance of the views, presence of existing development within the view, and partial screening from intervening vegetation, buildings, and topography. This would lead to a slight to insignificant adverse significance of effect. Effects on vehicle users along the A10 have been assessed to be minor adverse by Year 15 following the establishment of planting indicated along the western boundary of the site.
- 8.1.13 After considering the proposed housing density of the appeal scheme, it is my opinion that the plans do not demonstrate how the proposed density of development has been informed by the character of the local area. Whilst the DAS concentrates on identifying the similarities between the proposed density and existing residential areas in the vicinity, the scheme does not reflect the necessary transition from suburban to rural landscape character. I have also raised concerns about the restriction of proposed open spaces to the edges of the site and a narrow linear park along Footpath 029. These areas are not well integrated, further compounding the density of proposed residential clusters and not adhering to recommendations within the National Design Guide.
- 8.1.14 It is my opinion that the appeal scheme conflicts with both local and national policy. The proposals do not conserve, enhance or strengthen the character of the site and surrounding area, placing the scheme in conflict with Local Plan Policies DES2, DES4 and BCANP Policy HD4. The appeal scheme does not protect and enhance existing landscape features, nor does it maintain the Rib Valley setting of the Buntingford Community Area, placing it at odds with Local Plan Policy DES3 and BCANP Policy ES1. By failing to be sympathetic to the local

character and landscape setting, the appeal scheme is in conflict with NPPF Paragraph 135, sub-section C and BCANP Policy HD2. In addition, the proposals do not recognise the intrinsic character and beauty of the countryside as required by NPPF Paragraph 180, sub-section B, as well as BCANP Policy BE2. Failure to incorporate a more open character informed by the existing site and surroundings is a missed opportunity and places the scheme in conflict with Local Plan Policy HOU2.

- 8.1.15 For the reasons above, I conclude that the appeal scheme would result in development that would significantly and demonstrably harm the landscape setting, character and appearance of the site, as well as the settlement edge of Buntingford.

wynne-williams associates
landscape architects & arboricultural consultants

2 Threshelfords Business Park, Inworth Road, Feering, Colchester, CO5 9SE
01376 573050 / enquiries@w-wa.co.uk / www.w-wa.co.uk