

Statement of Common Ground (SoCG): Landscape Matters

Land North of A507, West of A10,
Buntingford SG9 9ER

Appeal Ref: 6008238

Appeal on behalf of Hallam Land
Management against the refusal of
Planning Application Reference
3/24/0966/OUT by East Hertfordshire
District Council

23rd July 2026

Signed Agreement

We agree to the statements set out in this Landscape Statement of Common Ground.

For the Appellant Hallam Land Management:

Name: Natasha Jones

Signature: *Natasha Jones*

Date: 23/07/2026

For East Hertfordshire District Council:

Name: Neil Button

Signature: *Neil Button*

Date: 23/07/2026

Contents

1	Introduction	4
2	Matters Agreed	5
3	Matters in Disagreement	9

1 Introduction

- 1.1.1 The Landscape Statement of Common Ground (SoCG) is made between the Appellant, Hallam Land Management, and East Hertfordshire District Council (the Council), to assist the Inspector with the identification of the main areas of agreement and disagreement between the two parties regarding landscape and visual matters.
- 1.1.2 This topic-specific Landscape SoCG is supplemental to the Main SoCG that has been agreed between the Appellant and East Hertfordshire District Council. This Landscape SoCG has been prepared to clarify detail in respect of the remaining areas of disagreement pertaining to landscape and visual matters. This will allow the Public Inquiry to focus on the most pertinent issues.
- 1.1.3 The Appellant has appointed Stantec UK Limited (Stantec) as expert witness in relation to landscape and visual matters.
- 1.1.4 Stantec has been involved with the project since 2024 when it was appointed to provide landscape and visual assessment and green infrastructure / landscape strategy services.
- 1.1.5 Following the submission of the application, comments pertaining to landscape and visual matters were made by Place Services, as Landscape Consultant to East Hertfordshire District Council; these were dated 20/09/2024.
- 1.1.6 Design South East held a Design Review Panel on 24/09/2024 and provided their response in Report of the Design South East Design Review Panel dated 09/10/2024.
- 1.1.7 Following the submission of further information in June 2025, which included visualisations, landscape and arboricultural comments were made by the Council's Landscape Officer; these dated 08/08/2025.

2 Matters Agreed

- 2.1.1 In relation to landscape matters and Reason for Refusal 2, the following points are agreed.
- 2.1.2 The Appeal Site does not lie within a National Landscape designation or local landscape designation, nor within any environmental designations.
- 2.1.3 The Appeal Site is within the 'Rural Area Beyond the Green Belt' designation on the Policies Map within the East Hertfordshire District Plan 2011-2033 adopted 2018. The Rural Area Beyond the Green Belt is an area of the District noted within Policy GBR2 to comprise "*a valued countryside resource*".
- 2.1.4 The summary of the Report of the Design South East Design Review Panel dated 09/10/2024 states, "*The masterplan has many positive features, including proposed public realm improvements, the provision of additional facilities for Buntingford and a good response to topography*".
- 2.1.5 The Appeal Site does not exhibit high scenic quality, has low rarity and is representative of the wider agricultural landscape. The Appeal Site does not contain characteristics, features or elements that are important examples and there are no notable features of wildlife, earth science, archaeological, historical or cultural interest and therefore the Appeal Site is not of any particular conservation interest.
- 2.1.6 The Appeal Site contributes to recreation through the Public Rights of Way that are within it and along its boundary.
- 2.1.7 The perceptual (scenic) aspects of the Appeal Site are shared common visual qualities with those of LCA 141 Cherry Green Arable Plateau (Landscape Character Assessment Supplementary Planning Document (SPD), East Herts Council, 2007).

- 2.1.8 The Appeal Site has a sense of openness to its western and northern areas, and it is an intensively managed arable landscape which does not exhibit wildness or wild land. The Appeal Site does not have a high level of tranquillity. The sense of tranquillity within the Appeal Site is at its greatest in its north-western extents where it is away from the audible and visual intrusion of traffic on the A10 and A507 and which is where the country park open space is located.
- 2.1.9 The Appeal Site does not have any known associations with particular people, such as artists or writers, or events in history that contribute to perceptions of the natural beauty of the area.
- 2.1.10 The Appeal Site does not fall within a National Character Area of special sensitivity.
- 2.1.11 The Appeal Site does not comprise a 'valued landscape' for the purposes of 187(a) NPPF which requires protection and enhancement of 'valued landscapes'.
- 2.1.12 Landscape Character Area (LCA) 141 Cherry Green Arable Plateau (Landscape Character Assessment Supplementary Planning Document (SPD), East Herts Council, 2007) describes rarity and distinctiveness of LCA 141 as, "*The landscape is a fairly frequent landscape type within the county with no major distinctive characteristics*". LCA 141 is also described as, "*The area mainly has a quiet and remote feel apart from where locally closer to the A507 and the A10 corridor.*"
- 2.1.13 Landscape Character Assessment Supplementary Planning Document (SPD), East Herts Council, 2007 evaluates LCA 141 Cherry Green Arable Plateau as 'Poor' condition and 'Moderate' strength of character, resulting in the strategy and guidelines for managing change to be 'Improve and Restore'.
- 2.1.14 Buntingford and the Appeal Site are located within the Rib valley.

- 2.1.15 The existing settlement of Buntingford has historically grown along the River Rib and up the valley slopes.
- 2.1.16 Appendix 1 of the Buntingford Community Area Neighbourhood Plan (BCANP) requires future development on higher ground to be limited in height and for housing development to be within the Rib valley setting.
- 2.1.17 A Landscape and Visual Impact Assessment (LVIA) prepared by Stantec was submitted with the planning application and mitigation measures have been taken into account when considering the effect of development on landscape character. There is no methodological dispute as to the approach of the LVIA, the dispute relates to differences of professional judgment.
- 2.1.18 The Council's former Landscape Consultant (Place Services) stated in the initial consultation response dated 20/09/2024 states, "*The submitted LVIA also groups sets of visual receptors and therefore provides a judgement on a collection of viewpoint receptors. Whilst we judge that there would be more variation between the assessed magnitude of change between receptors than is afforded that within the submitted LVIA, we judge that the assessment considers the worst-case scenario and judges the worst affected visual receptor within the receptor group.*" (3rd paragraph, page 6 of consultation response.).
- 2.1.19 Following a meeting with the Council's Landscape Officer (Place Services), additional landscape and visual assessment and visualisations from specified locations were requested by Place Services and which were submitted in a LVIA Addendum (prepared by Stantec).
- 2.1.20 The Council considers the submitted LVIA to be written in accordance with Guidelines for Landscape and Visual Impact Assessment' Third Edition (GLVIA3) and that it references Landscape Institute TGN 02/21 'Assessing the Value of Landscapes

Outside National Designations' and the Landscape Institute TGN 06/19 'Visual Representation of Development Proposals'.

- 2.1.21 All landscape and visual information necessary to determine the application has been provided and is of sufficient quality.
- 2.1.22 The Land Use Components Plan (North of Baldock Road) prepared by David Lock Associates (DLA) for the Outline Application indicates an asterisk symbol representing the location of a sports pavilion. Discussions about the sports pavilion and what sports uses it could accommodate, have evolved between the Appellant and Council since the application submission. The Appellant confirms that a maximum height of 8m for the sports pavilion would accommodate the necessary internal height for badminton to be played. It is agreed that the LVIA Addendum considered the sports pavilion which is shown on the Land Use Components Plan.

3 Matters in Disagreement

- 3.1.1 In relation to landscape matters and Reason for Refusal 2, the following points remain in disagreement.
- 3.1.2 Whether the Proposed Development would contribute to the Strategy and Guidelines for LCA 141 Cherry Green Arable Plateau, Landscape Character Assessment SPD, East Herts Council 2007.
- 3.1.3 Whether the development proposals conserve, enhance or strengthen the character of the District's Landscape in conflict with Policy DES2.
- 3.1.4 Whether the landscape impacts, mitigation or enhancement opportunities are appropriately addressed by the development.
- 3.1.5 Whether the development proposals are compatible with the character and appearance of the rural area, and if this amounts to a conflict with Policy GBR2. It is the Council's position that the proposals do not constitute any of the forms of development that are permitted by Policy GBR2 (a) to (h).
- 3.1.6 Whether the proposals would intrude unacceptably upon and have a significantly harmful urbanising impact on the LCA 141 Cherry Green Arable Plateau character area.
- 3.1.7 Whether the development would fail to preserve and value the Rib valley setting of the Buntingford Community Area by virtue of the substantial presence of built form at the elevated parts of the landscape.
- 3.1.8 Whether the development results in significant harm to the rural landscape character and would fail to recognise the intrinsic character and beauty of the countryside.

- 3.1.9 Whether the development would extend settlement into the plateau landscape and would represent an incursion beyond the valley into the more open and elevated plateau.
- 3.1.10 There is professional judgement disagreement regarding the level of landscape effect upon landscape character in terms of the effect on key characteristics of 'Cherry Green Arable Plateau' (LCA 141) of the East Herts District Landscape Character Assessment (2007).
- 3.1.11 There is professional judgement disagreement regarding the level of landscape effect upon the landscape character of the Site and its immediate surroundings.