



East Herts District Council
Wallfields
Pegs Lane
Hertford
SG13 8EQ

20/09/2024

For the attention of: Steve Fraser-Lim

Ref: 3/24/0966/OUT – Land North Of A507, West Of A10 Buntingford

Thank you for consulting us on the Outline planning application for development of up to 600 dwellings (C3), elderly accommodation (C3), Mixed Use Local Centre (including flexible use E, F and Sui Generis), First School, informal and formal open space, associated works and infrastructure including a new access from the A507 and pedestrian bridge over the A10, with all matters reserved except access.

This letter sets out our consultation response on the landscape impact of the application and how the proposal relates and responds to the landscape setting and context of the site. This response follows a workshop meeting with the applicant on 11/09/2024.

Site Context

The application site is located to the west of Buntingford although is separated from the settlement by the A10 road. The A507 road runs along the southern boundary and defines the edge of the site. A small area of commercial development is located to the south-east corner.

A public right of way (PRoW) runs through the centre of the site, extending from a footbridge that crosses the A10 into Buntingford, to a minor road beyond the west of the site. Throcking Holy Trinity Church sits to the west of the site in the small settlement of Throcking.

The site itself comprises three arable fields which are on undulating land. The site generally falls towards the east towards Buntingford and the River Rib, although also falls to the west once outside the site boundary. Tire Hill is also located to the south-east at the commercial area.

Planning Context

East Herts District Plan (20118

East Herts District Plan (2011-2033) was adopted in 2018 and includes the following policies relevant to landscape and the site:

- The site is located within Policy GBR2 – Rural Area Beyond the Green Belt, and states that *“In order to maintain the Rural Area Beyond the Green Belt as a valued countryside resource, the following types of development will be permitted, provided that they are compatible with the character and appearance of the rural area”*. However, this type of development is not included under this Policy.
- Policy DES2 ‘Landscape Character’ states:
 - i. *“Development proposals must demonstrate how they conserve, enhance or strengthen the character and distinctive features of the district’s landscape. For major applications, or applications where there is a potential adverse impact on landscape character, a Landscape and Visual Impact Assessment and/or Landscape Sensitivity and Capacity Assessment should be provided to ensure that impacts, mitigation and enhancement opportunities are appropriately addressed.*
 - ii. *Appropriate mitigation measures will be taken into account when considering the effect of development on landscape character/landscaping.*
 - iii. *Where relevant, development proposals will have regard to the District Council’s currently adopted Landscape Character Assessment Supplementary Planning Document.”*
- Policy DES3 ‘Landscaping’ states:
 - i. *Development proposals must demonstrate how they will retain, protect and enhance existing landscape features which are of amenity and/or biodiversity value, in order to ensure that there is no net loss of such features.*
 - ii. *Where losses are unavoidable and justified by other material considerations, compensatory planting or habitat creation will be sought either within or outside the development site. Replacement planting schemes should comprise mature, native species appropriate to the local conditions and landscape character, supported by a monitoring and replacement programme.*
- Policy DES4 Design of Development, DES5 Crime and Security and NE4 Green Infrastructure should also be considered.

Buntingford Community Area Neighbourhood Plan (BCANP)

- Policy HD2 states: *“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. Where appropriate, a Landscape and Visual Impact Assessment should be provided to ensure that impacts, mitigation and enhancement opportunities are appropriately addressed.”*
- ‘View East from Point H (Throcking turn off A507)’ states that *“Buntingford has largely remained hidden from view when approaching from the west, as this shot taken from close to the A507 clearly shows. Nowadays, apart from the mobile ‘phone communication tower, the*

only significant object seen is the roofing of the buildings at Buntingford Business Park. With expansion of the Business Park being proposed for the future, every effort should be made to ensure that building heights are restricted to a level that will maintain this view."

- 'View South-East from Point I (Throcking Lane)' states that *"This view, taken in December 2015, shows the significant impact that three recent planning decisions have had on visibility from the north-west."*
- "It concludes that *"The results of this photographic exercise demonstrate that Buntingford largely continues to nestle within the local landscape of the North-East Hertfordshire Plateau. Nevertheless, they also show that great care should be taken in granting further permission for more development in and around the Town if this is to remain the case and if we are to ensure that the highly prized landscape remains the attractive area for all types of walkers and riders that it currently is."*

Review of Submitted Information

The application site is not allocated within the East Herts District Plan (2018) and introduces a major development within the rural countryside.

Policy HD2 of the Buntingford Neighbourhood Plan states: *"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"*. The submission must therefore demonstrate that impacts are reduced through the design and layout, notably from the surrounding countryside where the rural character should be retained.

'View South-East from Point I (Throcking Lane)' states that *"This view, taken in December 2015, shows the significant impact that three recent planning decisions have had on visibility from the north-west."* The proposed development is likely to further impact on the view from this location, and therefore forthcoming submitted information should demonstrate how this is being mitigated.

The development risks compromising the current setting of Buntingford that *"largely continues to nestle within the local landscape of the North-East Hertfordshire Plateau"*. The Neighbourhood Plan indicates that *"great care should be taken in granting further permission for more development in and around the Town if this is to remain the case and if we are to ensure that the highly prized landscape remains the attractive area for all types of walkers and riders that it currently is"*. We judge that the proposed development will directly impact on the prized landscape that forms the setting of Buntingford.

The largest constraint to the development is the separation from Buntingford owed to the presence of the A10 which runs along the eastern boundary. Although the new development may appear as visually connected to the existing settlement of Buntingford, the physical separation is therefore a primary consideration in terms of access, permeability and community integration.

We note this addressed through the development being largely located on the eastern edge of the site which is located closest to the A10 and the existing settlement of Buntingford. This is a preferable arrangement whereby the built extent is viewed in context of the existing settlement and provides nearby connections.

Landscape and Visual Impact Assessment (LVIA)

An LVIA has been submitted and undertaken by Stantec. The report is conducted in accordance with the 'Guidelines for Landscape and Visual Impact Assessment' Third Edition (GLVIA3) and 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'.

We would also have appreciated the inclusion of a table to support paragraph A.2.10, since the Methodology does not clarify how a Medium Value and High Susceptibility (for example) would be combined to produce an overall judgement of Sensitivity.

Landscape Character

The site is located within Area 141 'Cherry Green Arable Plateau' Landscape Character Area (LCA) of the East Herts District Landscape Character Assessment (2007). Key characteristics of the LCA include its location on the elevated plateau between the River Rib and the settled plateau to the west. The landscape is open arable land with extensive views and minimal settlement. Throcking Church is a distinctive feature.

The landscape is visually sensitive to changes in built form owed to extensive views within the large-scale exposed area.

The Visual Impact states that; *"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."*

The Strategy and Guidelines for Managing Change suggest advise to *"promote a strategy for reducing the visual impact of development on the upper slopes of Buntingford"*.

The LVIA judges LCA 141 has **high** value and **high** susceptibility, resulting in **high** sensitivity, which we agree with. At Year 1, it is assessed that there would be a **small** magnitude of change which is combined to form a **minor adverse** significance of effect.

Since the development is permanent and introduces a prominent new feature into an undulating landscape, which will substantially change the baseline situation. The proposals would cause a major change to a number of the key characteristics of this LCA, including the open arable character, and therefore we would judge that the overall effects on LCA 141 have been judged too low.

The submitted assessment (Appendix C) judges that there would be **moderate adverse** effects on the site and surrounding context at Year 1. We judge that a combined **high** sensitivity and **large** magnitude of change would experience **major adverse** effects, since the rural character and open undulating arable landscape with expansive views would be entirely lost and are very characteristic of the site and surroundings.

Visual Impact

We judge that there are several missing viewpoint receptors within the LVIA, and therefore the submitted assessment is not representative of all potential short-distance views of the site. Notable views absent from the LVIA include:

- A. Throcking Lane (Figure 1): the northern boundary of the site is defined by Throcking Lane with fragmented hedgerows and sections which are not separated from the site by any vegetation at all. The eastern extent of Throcking Lane is notably open to the site with the red line boundary abutting the road. We would therefore have expected Throcking Lane to be represented within the LVIA as this receptor will likely experience the most adverse impacts.
- B. Throcking Road adjacent to Throcking Holy Trinity Church: Views from the west are expansive and provide open views of the site across the undulating rural landscape. We would therefore have expected this receptor to have been included owed to the wider landscape character being adversely impacted from this location. The design of the layout should be carefully considered from this location to reduce the impact on views from the wider countryside and in combination with the topography.
- C. Lane south from Throcking to the A507 Baldock Road: Mid-distance views are obtained from this location of the site. Views of the development proposals are contingent upon the placement of buildings within the context of the topography and therefore is an important receptor which has been missed from the LVIA.
- D. A10 (Figure 2): Views from the A10 which runs along the immediate eastern boundary should also have been included as a receptor within the assessment. Views are obtained from the entrance to the PRoW which crosses the A10 towards the north-eastern corner of the site. Considering the proximity of the A10 to the site and the close range views available, we judge this should also have been included as a receptor within the LVIA.



Figure 1: Application Site adjacent to Throcking Lane



Figure 2: Application Site adjacent to the A10

In the meeting with the applicant on 11/09/2024, visual receptors missing from the LVIA were identified. The applicant confirmed that receptors A-C receptors would be integrated within further amendments to the LVIA.

Whilst the applicant stated that Viewpoint 6 is representative of views from the north-east close to the A10, on review we do not feel that this viewpoint accurately represents close distance views of the A10. As outlined under Receptor D above, we judge that views from the A10/footpath crossing point need representing within the submitted assessment.

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.

For example, visual receptors from Viewpoint 2 are located on lower ground where the topography would screen most of the development and only rooflines would be visible. However, Viewpoint 16 which is located within the centre of the site on the highest ground and is located amongst the proposed built development. Whilst we would typically prefer that each viewpoint receptor is judged separately to avoid a generalised assessment of groups of visual receptors, we appreciate that the worst-case receptor affects tend to be judged.

Within the meeting with the applicant on 11/09/2024, we raised that Wirelines would be beneficial to demonstrate how the proposed development would sit within the undulating varied topography from different viewpoints. The applicant has since suggested that the design information that they have at outline stage is indicative and limited and therefore Wirelines would only demonstrate the maximum extents of development envelopes. They consider that Wirelines would be of limited use at this stage and demonstrate a significantly worse illustration of the impact of development on the ground which would not be beneficial for officers and public. The intention is therefore not to submit Wirelines at this stage.

Since the submitted LVIA judges that there will be major adverse harm (at Year 1) from pedestrians on PRoWs within the site and up to 0.5km away, we maintain that wireframes would be useful at an early stage. We recognise that the wireframes would present the maximum extent and the full perceived mass showing a worse illustration of the impact, however all judgements within the LVIA should be based on the worst-case scenario. Wireframes would be beneficial to understanding if the rooflines break the skyline. We do however recognise the constraints and advise that this information is included at application.

Review of Masterplan

- The northern boundary on Throcking Lane is one of the most susceptible receptors to development, owed to its proximity to the site and unbroken views of the undulating arable landscape. The Landscape Mitigation Strategy indicates the presence of a green buffer along this boundary however consideration for how this can contribute to reducing the visual impact is required.
- Small woodlands are a characteristic of the surrounding LCAs. Within Area 141, proposals should *“promote the creation of new small to medium scale native broadleaved woods throughout the area to reduce the scale of the open arable areas, using ancient hedge and field boundaries to locate the most appropriate location for wood restoration and expansion”*. This will also contribute to reducing the visual effects of the scheme, which will currently be very visible in the surrounding landscape.
- Submitted plans indicate that development is not proposed on the central ridgeline and is located on marginally lower ground to reduce the visual impact of the development from the surrounding landscape. We agree that this approach is beneficial for reducing the surrounding impacts, notably from the west. We do however judge that limited information is currently presented to show how the rooflines would appear within the topography.
- A Design Code for the development scheme is essential for ensuring a coherent and consistent approach which can be adopted throughout.
- A large grey area is indicated on the Landscape Mitigation Plan. However this is not identified within the plan. This area also proposes the removal of an area of establishing vegetation which would be beneficial to retain in the interest of biodiversity and visual mitigation. We therefore advise retaining this area of vegetation.
- Details of the character of the east-west Green Infrastructure Network are important to ascertaining how this will feed into the biodiversity, screening and public access through nature. This should be included within the submitted DAS.
- Additional landscaped areas will be important to improving the character of the urban spaces. Given the rural context of the proposed development site, introducing trees and vegetation into all urban spaces is essential for integrating the development into the countryside context that currently remains.
- Pedestrian and cycle links are essential to the success of the development scheme. Whilst the northern footpath connections are not currently well-used, we judge that the challenge of crossing the A10 at this location acts as a deterrent to utilising this crossing point. We therefore judge that this crossing should be well considered and integrated into the design of the masterplan.

- A strong GI strategy is essential for limiting the visual effects of introducing urban development onto a rural landscape which is currently largely undeveloped. Highly sensitive visual receptors are identified within the LVIA and from the west and therefore the establishment of a good GI network is important to help reducing the visual impact from this edge.
- SuDS are orientated towards the north-east corner and on the lowest ground of the site. The design of these basins is important to their integration into the scheme where there are substantial benefits to providing public access and extensive planting to form an interesting feature and space for ecological enhancements alongside.
- Whilst areas of tree planting are important for the large open space to the west, we also advise that large open areas are retained to reflect the open character of the surrounding LCA.
- A large area of playing pitches are proposed on the undulating valleysides. We therefore anticipate a large amount of earthworks will be required to create areas of flat land. Further information will therefore be required regarding whether earth will be removed, retained on site, or if additional earth will be imported.
- Height and scale of the proposed dwellings should be a strong consideration owed to the undulating and elevated landform.
- The relationship between the school and the rear gardens of properties requires careful consideration.
- A predominance of one species or variety should be avoided in order to minimise the risk of widespread biotic threats to the urban forest and to increase species diversity. Preference should be given to native trees and shrubs, though the use of naturalised trees and shrubs, which are not necessarily native but are the correct tree for site conditions and would add landscape and arboricultural value could be used where appropriate and justified.
- In respect of SuDS design, we would expect the ground contouring, planting and inlet and outlet design to be carefully considered to maximise biodiversity and amenity value. A standard approach of precast concrete and galvanised handrail for inlets/outlets should be avoided and a range of vegetation types such as wildflowers and other nectar rich plants, grasses of various heights, drought tolerant species as well as marginal aquatics and wet grassland should be used.
- The use of parking courts should be avoided. If proposed, they should be designed to provide safe and secure parking and access to properties whilst also providing suitable soft and hard landscaping that ensures the space is of high quality and in turn remains actively used.
- Retention of mature hedge lines, tree belts, hedgerow-trees, and standalone trees on the site boundaries is required. Removal should only be proposed where necessary and justified to facilitate access. We would expect opportunities to be taken to enhance / strengthen all boundaries as 'eco-tone'. There is also an opportunity for a larger proportion of the south-eastern boundaries to be retained as woodland creation and / or woodland belt and green buffer to form a stronger edge to the residential care properties.

- Trees and vegetation will be essential to help provide cooler spaces across the development through shading. The leaves and branches of trees and plants can reduce the amount of solar radiation that penetrates through tree canopies, although the amount of sunlight transmitted varies depending on species. As such, careful consideration of tree species projects height and canopy spread, tree and plant requirements, the types of leaves, berries and flowers it produces and its siting will all be important factors in determining designing cool spaces. Generally speaking, we would advise that preference is given to native planting, though there may be situations where non-native species may provide similar climate benefits (where appropriate). We would recommend that trees are planted at regular intervals along both sides of proposed roadways and footpaths to provide valuable form shading.

Submission Documents

We advise any forthcoming application is supported by the following submission documents and plans:

- Arboricultural Survey (to include trees, hedgerows and shrubs), Arboricultural Impact Assessment and Method Statement.
- Landscape Strategy/GI Strategy. This document should set the overarching principles proposed as part of the scheme. This should include detail on mitigation measures (highlighted in the LVIA), retained landscape features, landscape enhancements and demonstrate how new green infrastructure links to existing GI/habitat corridors.
- Landscape Management and Maintenance Plan (LMMP)/Landscape and Ecological Management Plan (LEMP).
- Hard landscaping – The surface treatment to footpaths, public realm and highways should be aligned with the character of the development.
- SUDs strategy (including existing watercourses) – Ditches, rain gardens, swales, ditches, rills, ponds, etc.
- Planting strategy – High quality planting along access roads, boundaries, public spaces.
- Ecological enhancements, bird / bat boxes and habitat hibernacula proposals.
- Follow principles of sustainability in terms of reduction of embodied energy in construction and materiality, water harvesting, health and wellbeing, climate resilience and energy use.
- Environmental Colour Assessment

Please let us know if any queries regarding the matters raised above.

Yours sincerely,

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Landscape Consultant

Place Services provide landscape advice on behalf of East Herts District Council

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.