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Land North of A507, West of A10 Buntingford Landscape Proof of Evidence

of Natasha Jones BA(Hons) BLA CMLI

LPA Planning Application Ref: 3/24/0966/OUT

PINS Ref: 6008238

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Prepared for:
Hallam Land Management

Prepared by:
Stantec

Project Number:
331610261

Appeal against the Refusal of Outline Permission for:

Land North Of A507, West Of A10 Buntingford: Outline planning application for development of up to 600 dwellings (C3), up to 60 units of 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 bridges over the A10, with all matters reserved save for access.

Landscape Proof of Evidence of Natasha Jones, Director of Landscape Architecture at Stantec.

LPA Planning Reference: 3/24/0966/OUT

PINS Reference: 6008238

Prepared on behalf of Hallam Land Management.

Stantec UK Limited, Embarq 2nd Floor, 120 Redcliff Street, Bristol BS1 6HU
Email: natasha.jones@stantec.com

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1 Introduction and Scope of Evidence

1.1 Introduction

1.1.1 My name is Natasha Jones, and I am a Director of Landscape Architecture at Stantec UK Limited. I have been Director since 2021 and am a leader of the UK Landscape Architecture team. I joined Stantec (formerly known as PBA) in 2013. Prior to that, I was Associate Director at Cooper Partnership Limited.

1.1.2 I hold a Bachelor of Arts with Honours degree in Landscape Design and a Bachelor of Landscape Architecture Post-graduate degree, both from Manchester Metropolitan University. I have been a Chartered Member of the Landscape Institute (CMLI) since 1998.

1.1.3 I have over 27 years' post-chartership professional experience in landscape planning, landscape architecture and environmental matters. I have provided professional advice on townscape, landscape and visual impact assessment and for the strategic design, green infrastructure and landscape strategies of a wide variety of developments throughout the UK. These include small and strategic-scale residential, mixed-use, commercial, industrial, infrastructure, energy and renewable energy, and recreation proposals for local authorities, public and private companies. I have dealt with sites within and adjacent to National Parks, National Landscapes (Areas of Outstanding Natural Beauty), Strategic and Local Gaps and other local landscape designations. My professional experience includes the preparation of evidence and acting as an expert witness in relation to landscape matters at public inquiries, Development Consent Order (DCO) examinations, and local plan hearings.

1.2 Scope of Proof of Evidence

1.2.1 I am familiar with the Appeal Site and its surroundings having overseen the production of the landscape and visual impact assessment (LVIA) and landscape strategy associated with the Proposed Development. I have most recently visited the Appeal Site on 19th May 2026.

1.2.2 This Proof of Evidence addresses specifically the following landscape Reason for Refusal (RfR):



'2. The proposals by reason of scale, form, visual impact and siting on the west side of the A10 outside of the Buntingford Settlement Boundary, would intrude upon and have a significantly harmful urbanising impact upon the 'Cherry Green Arable Plateau' (LCA 141) character area within the East Herts District Landscape Character Assessment (2007). The development would also 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. As such the proposals comprise a substantial urban extension outside of and adjacent to Buntingford which encroaches into the rural area beyond the Green Belt. The development would therefore result in significant harm to the rural landscape character and would fail to recognise the intrinsic character and beauty of the countryside, conflicting with Policies GBR2 and DES2 of the District Plan (2018), Policies ES1 and HD2 of the Buntingford Community Neighbourhood Plan (2017) and paragraph 187(b) of the National Planning policy Framework. [sic]

1.2.3 Updates pertaining to NPPF 2026 are highlighted in pale orange for ease of reference.

1.2.4 My Proof of Evidence should be read in conjunction with the proof prepared by Gary Stephens, Marrons, the Main Statement of Common Ground (SoCG) (CD 15.1), and the Landscape SoCG (CD 15.4), and the proof prepared by Peter Blair, Tetra Tech.

1.2.5 My Proof of Evidence provides the following updated plan:

- LVIA Figure L3 Landscape Character Plan: has been updated to correct an error in the draw order of hatches, which resulted in LCA142 High Rib Valley illustrating the hatch symbol of LCA143 Wyddial Plateau. This error was contained to the figure only – the LVIA text correctly refers to LCA142 High Rib Valley as being located to the east of the Site. The corrected version is Figure NJ2 in Appendix A of this Proof of Evidence.

1.3 Structure of Evidence

1.3.1 Firstly, I describe the characteristics of the Appeal Site and its context, then summarise the LVIA landscape assessment methodology and the findings of the landscape assessment for the receptors of LCA 141 Cherry Green Arable Plateau and the character of the site and its immediate surroundings. I then describe pertinent landscape policy in relation to the



landscape Reason for Refusal. I then provide my consideration and response to the landscape Reason for Refusal. Finally, I set out my conclusions.

1.3.2 I was instructed by Hallam Land Management to fill the role of landscape expert witness (the Appellants) in 2025. All conclusions are my own and based on my own professional opinion and experience.

1.3.3 The evidence that I have prepared and provide for this Inquiry in this Proof of Evidence is true and has been prepared and is given in accordance with the guidance of my professional institution, the Landscape Institute, irrespective of by whom I am instructed. I confirm that the opinions expressed are my true and professional opinions.



2 Appeal Site Context and Appeal Site Appraisal

2.1 Context

- 2.1.1 The Appeal Site adjoins the western edge of the existing market town of Buntingford, and lies adjacent to the A10 to the east, and to the A507 to the south. The Appeal Site is located within the Buntingford Community Area (BCA), which includes Buntingford and several villages including Aspenden, Buckland & Chipping, Cottered, Hormead and Wyddial. These settlements are noted in the foreword of the Buntingford Community Area Neighbourhood Plan (2014-2031) (BCANP) (CD 5.2) as being, “...located within and overlooking the Rib Valley...” and are set within a surrounding agricultural landscape. Buntingford is the largest of the settlements.
- 2.1.2 The Appeal Site does not lie within a National Landscape designation or local landscape designation, nor within any environmental designations. It lies within the area which policy GBR2 Rural Area Beyond the Green Belt of the East Herts District Plan 2018 (CD 5.1) applies to. Paragraph 5.16 of the Main Statement of Common Ground (CD 15.1) and Paragraph 2.1.11 of the Landscape SoCG (CD 15.4) sets out the parties’ agreement that the Appeal Site does not comprise a valued landscape for the purposes of 187(a) NPPF (CD 5.16). I note that the NPPF 2026 does not carry forward specific reference to valued landscapes.
- 2.1.3 The A10 runs to the west of most of the existing built-up area of Buntingford, providing an arterial transport route between Royston and Ware. The A507 Baldock Road provides an east to west connection from Buntingford High Street to Cottered and onwards to Baldock.
- 2.1.4 The River Rib flows through its associated river valley at around 90m AOD and through Buntingford. To both sides of the valley floor, sloping landform is gently undulating and complex, rising to higher levels. The valley floor is at its narrowest to the north of Buntingford, around Chipping, and extends and widens to the south to south-southeast of Buntingford. The river valley is enclosed by a spur of land which is around 120m+ AOD to the east of Buntingford; by a higher ridgeline at around 130m AOD to the north-northeast; and to the west and northwest by spurs and slopes rising to a plateau reaching up to 150m+ AOD height. See Figure NJ1, Appendix A.



- 2.1.5 Outside of the settlements, the agricultural landscape pattern comprises arable and pasture fields, delineated by field boundary hedgerows of varying thickness and quality, some of which contain hedgerow trees. In the wider area, there are several small, scattered blocks and belts of woodland; however, these woodlands exhibit limited connectivity.
- 2.1.6 There is a good network of Public Rights of Way (PROWs) in the countryside, including the Hertfordshire Chain Walk, a recreational route of linked circular walks. Local PROWs connect Buntingford with the surrounding villages.
- 2.1.7 The Buntingford Conservation Area is located within 1km of the Appeal Site to the east. The intervening development within the western part of Buntingford physically and visually separates the Appeal Site from the Conservation Area. There is no intervisibility between the Conservation Area and the Appeal Site. A Conservation Area also encompasses the village of Aspenden and its setting, around 1km to the south of the Appeal Site. This is physically and visually separated from the Appeal Site by structural field boundary vegetation within the intervening agricultural landscape.
- 2.1.8 The Appeal Site is located within National Character Area (NCA) 86: South Suffolk and North Essex Clayland (Natural England NCA profiles) (CD 9.7). The East Herts Council Landscape Character Assessment Supplementary Planning Document (CD 9.1) was published in 2007; the Appeal Site is situated within Landscape Character Area (LCA) 141: Cherry Green Arable Plateau. LCA 142: High Rib Valley is situated to the east and south of the Appeal Site.

2.2 Appeal Site Appraisal

- 2.2.1 The Appeal Site comprises circa 50 hectares (ha) of arable land delineated centrally into two irregular parcels by a line of partially denuded hedgerow and hedgerow trees. A series of power lines run in a north-south direction through the Site. The boundaries of the Site are formed by overgrown ill-managed hedgerows, scrub vegetation, hedgerow trees and vegetated road verges. The Appeal Site is bounded to the east and south by the A10 and A507, whilst the minor road Throcking Lane borders part of the Appeal Site's northern edge. To the south-east, a combination of mature hedgerow, scrub and trees provide a buffer to the Buntingford Business Park and associated built form, which ranges in scale and massing. To



the west, the degraded hedgerow pattern allows unfiltered views across the undulating rural landscape toward Cottered, comprising arable fields, pasture and scattered woodland.

- 2.2.2 The Appeal Site is on undulating topography, at 130m AOD at the highest point of its western boundary, descending gradually eastwards toward Buntingford, to 110m AOD on the north-eastern boundary. To the southwest and west, the landform descends and then rises gently towards Cottered, with the wider rural contextual landform in the west sitting at higher levels above the Appeal Site.
- 2.2.3 The Appeal Site is unremarkable, but exhibits a character typical of LCA 141 Cherry Green Arable Plateau, set within an area adjacent to the settlement edge. PROW Cottered 40 traverses the Appeal Site as a trodden path, accessible to the east from a footbridge across the A10 at Buntingford and connecting to the wider network of PROW via PROW Cottered 39 and Cottered 46 to the west. The surrounding landscape to the west is agricultural and exhibits the “*open arable, large scale fields*” and “*limited woodland cover*” characteristic of the LCA. Other characteristics, however, such as a “*remote and isolated feel*” and “*open views to the valley of the Rib*” are not strongly reflected within the Appeal Site, which is subject to a degree of enclosure from the east resulting from the structural boundary vegetation.
- 2.2.4 There is a strong degree of openness and continuity to the west and north, while the linear tree-lines of the A10 and A507 provide a perceptual enclosure to the east and south respectively. An area of mixed scrubland adjoins the Appeal Site in the southeastern corner, providing a degree of separation from the development of Buntingford Business Park.
- 2.2.5 Overall, the Site does not exhibit a particularly high landscape quality or condition, as although typical character is represented and it has a moderate level of intactness, the condition of individual elements is highly variable, with some hedgerows being gappy or denuded in places.
- 2.2.6 Most of the Appeal Site does not itself exhibit a particularly high scenic quality, albeit there are medium to long distance panoramic views available across the wider landscape from within it. The rarity of the Appeal Site is low, as it does not contain elements or features that are rare within the wider landscape. The Appeal Site is representative of the wider agricultural



landscape, but does not contain characteristics, features or elements that are considered particularly important examples. There are no notable features of wildlife, earth science, archaeological, historical or cultural interest present within the Appeal Site, and therefore the Appeal Site is not of any particular conservation interest. PROW traverse the Appeal Site and follow part of the Appeal Site boundary, and as such the Appeal Site contributes to recreation. The perceptual aspects of the Appeal Site do not lend it any particular value, as it does not exhibit any wildness, being an intensively managed agricultural landscape. Whilst there is some limited sense of tranquillity within the Site, particularly toward the north-western extents away from the audible intrusion of traffic on the A10 and A507, this is not a notable feature of the Appeal Site considered as a whole. Should the employment allocation between the Appeal Site and Buntingford Business Park be developed, that is likely to diminish this still further (noting that work has already been undertaken to create a bund around the allocation). 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.

- 2.2.7 The visibility of the Appeal Site is predominantly influenced by landform and the extent and type of vegetation cover and built elements within the surrounding landscape.
- 2.2.8 Open views of the Appeal Site are available from PROWs Cottered 40 and 41 as they cross through and adjacent to the Appeal Site. However, due to the undulating pattern of the topography, there are no locations on the PROWs from which the entirety of the Appeal Site is visible.
- 2.2.9 Surrounding built development and road infrastructure, together with the wooded vegetation associated with the A10 and A507, provide a degree of enclosure to the south-east. Whilst the Appeal Site is adjacent to the north-western edge of Buntingford, it is nevertheless subject to some degree of visual separation from the settlement due to the presence of structural vegetation along parts of the A10, which is in cutting closest to the Appeal site.
- 2.2.10 Transient and oblique, glimpsed views to open views into the Appeal Site from the east and south are available to users of the A10 and A507 where there is gappy or denuded boundary vegetation, and open views across parts of the Appeal Site are available from the north and



from the wider landscape to the west. Views are available from the PROW network to the west of the Appeal Site, as well as from elevated land within the wider landscape context, although fragmented vegetation has a filtering effect. The upper parts of existing built form within the more elevated areas of Buntingford form a component of many of those views.



3 The LVIA and Effects on Landscape Character

3.1 LVIA and Landscape Effects on Landscape Character

- 3.1.1 A Landscape and Visual Impact Assessment (LVIA) (CD 1.15) prepared by Stantec was submitted with the planning application and mitigation measures were taken into account when considering the effect of development on landscape character.
- 3.1.2 The methodology used for the LVIA is set out in LVIA Appendix A (CD 1.15.1) and is drawn from guidelines set out in Landscape Institute and the Institute of Environmental Management & Assessment's Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA 3), 2013 (CD 9.2).
- 3.1.3 As noted in the Landscape SoCG (CD 15.4), both parties agree there is no methodological dispute about the LVIA.
- 3.1.4 The matters in disagreement include professional disagreement regarding the level of landscape effect on landscape character in terms of the effect on key characteristics of LCA 141 Cherry Green Arable Plateau and the level of landscape effect upon the landscape character of the Appeal Site and its surroundings. I therefore summarise the landscape assessment methodology of the LVIA and the LVIA findings for these two landscape receptors, below.

Summary of Landscape Assessment Methodology

- 3.1.5 The sensitivity of landscape receptors was determined by a combination of the value of the landscape receptor and the susceptibility of the landscape receptor to the type of change proposed, using professional judgement. Landscape value was determined through a combination of the importance of landscape-related planning designations and the attributes that are set out a paragraph A.2.4 of the LVIA (CD 1.15.i); these including landscape quality, scenic quality, perceptual aspects, rarity, representativeness, recreation and association. Landscape value categories are High, Medium and Low, and the criteria for these are provided in Table A.2.1 of the LVIA (CD 1.15.i). The assessment of the susceptibility of landscape character considers criteria of: landform, pattern / complexity, composition,



landcover, relationship of a given landscape area to existing settlements or developments, and potential for appropriate mitigation within the context of existing character and guidelines. The assessment of susceptibility of landscape features relates to the potential for loss/retention of the relevant features in relation to the type of development proposed, and the ease with which such elements may be replaced, where appropriate. Susceptibility of landscape character/ features is categorised as High, Medium or Low, as set out in Table A.2.2 of the LVIA (CD 1.15.i). Landscape susceptibility categories are High, Medium or Low, and the criteria for those is summarised in Table A.2.2 of the LVIA (CD 1.15.i). Based on the combination of value and susceptibility, an assessment of landscape sensitivity was reached and was defined as High, Medium or Low. Typically, a high value and high susceptibility receptor would result in a receptor of High sensitivity; and a low value and low susceptibility receptor would result in a receptor of Low sensitivity.

- 3.1.6 The landscape magnitude of change is informed by judgements about the precise nature of the change which arises from the Proposed Development. Table A.2.3 of the LVIA (CD 1.15.i) sets out the categories of magnitude, ranging from None to Large, and the associated criteria for each category; this is shown at Figure 3.1 below.

Figure 3.1: Landscape Magnitude of Change, extract from LVIA Appendix A (CD 1.15.i)

Table A.2.3: Landscape Magnitude of Change

Magnitude	Criteria
Large	Pronounced change to the existing landscape receptor that may affect an extensive area. The change may be long-term or may be irreversible.
Medium	Partial change to the existing landscape receptor that may affect a relatively extensive area. The change may be medium-term or may be irreversible.
Small	Limited change to the existing landscape receptor that may affect a relatively limited area. The change may be short-term or reversible.
Very Small	Very slight change to the existing landscape receptor that may affect a limited area. The alteration may be short-term or reversible.
None	No change to the existing landscape receptor.

- 3.1.7 The method for the determination of significance of landscape effects is set out in the LVIA at Section A.4 Significance of Effects (CD 1.15.i). To draw conclusions about the significance of landscape or visual effects, the combination of the sensitivity of the receptors and the magnitude of change were considered for the Proposed Development at the assessment



periods. The significance of effects is rated on a scale of Neutral to Major. The assessment of significance of effects is subject to professional judgement but in broad terms, where a receptor of High sensitivity experiences a Large magnitude of change as a result of the Proposed Development, the significance of effect is likely to be Major. Conversely, where a receptor of Low sensitivity experiences a Very Small magnitude of change as a result of the Proposed Development, the significance of effect is likely to be Negligible. Where it is considered that there is potential for both beneficial and adverse changes, these magnitudes of change are noted and the balance of these considerations used to inform conclusions on the significance of effect. LVIA Table A.4.1 (CD 1.15.i) provides the criteria for the significance of landscape effects and is replicated below in Figure 3.2.

Figure 3.2: Significance of Landscape Effects, extract from LVIA Appendix A (CD 1.15.i)

Table A.4.1: Significance of Landscape Effects – Criteria

Significance of Landscape Effect	Criteria
Major Beneficial	Alterations that would be substantially characteristic and result in a pronounced improvement of the existing landscape resource. Valued characteristic features would be restored or reintroduced as part of the Proposed Development.
Moderate Beneficial	Alterations that result in a partial improvement of the existing landscape resource. Valued characteristic features would be partially restored or reintroduced.
Minor Beneficial	Alterations that result in a limited improvement of the existing landscape resource. Characteristic features would be restored to a limited degree.
Negligible Beneficial	Alterations that result in a very slight improvement to the existing landscape resource, not uncharacteristic within the receiving landscape.
Neutral	Neither beneficial nor adverse effects on the existing landscape resource.
Negligible Adverse	Alterations that result in a very slight deterioration to the existing landscape resource, not uncharacteristic within the receiving landscape.
Minor Adverse	Alterations that result in a limited deterioration of the existing landscape resource. Characteristic features would be lost to a limited degree.
Moderate Adverse	Alterations that result in a partial deterioration of the existing landscape resource. Valued characteristic features would be partially lost.
Major Adverse	Alterations that would be substantially uncharacteristic and result in a pronounced deterioration of the existing landscape resource. Valued characteristic features would be wholly lost.

LCA 141 Cherry Green Arable Plateau

3.1.8 LCA 141 Cherry Green Arable Plateau is a published landscape character area in the East Herts Council Landscape Character Assessment Supplementary Planning Document (SPD) (September, 2007) (CD 9.1 and Appendix C of this proof). Landscape character areas (LCAs) are shown at Figure NJ2: L3 Landscape Character Plan, Appendix A. This is an updated version of the plan included with the LVIA (CD 1.15.vi) which accompanied the planning



application for the Appeal Site. The plan has been updated to correct an error in the draw order of hatches as noted in paragraph 1.2.4 above.

3.1.9 The key characteristics of LCA 141 are listed on page 218, East Herts Council Landscape Character Assessment SPD (CD 9.1)as:

- *“open arable plateau with some very large field units*
- *minimal settlement, restricted to individual farmhouses*
- *remote and isolated feel*
- *minimal woodland cover*
- *degraded landscape pattern with few hedgerows and associated trees*
- *organic winding lanes with few direct connections across the plateau, (except for A507)*
- *water towers, LV, electricity cables and aerial masts locally prominent features due to open landscape*
- *open views across plateau and to valley of the Rib”*

3.1.10 The distinctive features of LCA 141 are also listed on page 218, East Herts Council Landscape Character Assessment SPD (CD 9.1):

- *“deserted medieval village of Wakeley*
- *Sainsbury’s distribution depot (outside area)*
- *Throcking Church (outside area)”*

3.1.11 The evaluation section for LCA 141 identifies it as Poor condition and Moderate strength of character, resulting in the strategy and guidelines for managing change to be Improve and Restore. The impact of built development on LCA 141 is noted as being moderate, and the impact of land-use change noted as low, as shown in Figure 3.3 below.



Figure 3.3: Extract of Evaluation of Cherry Green Arable Plateau – Area 141, page 220 (Landscape Character Assessment SPD, East Herts Council) (CD 9.1):

CONDITION		STRENGTH OF CHARACTER		
<i>Land cover change:</i> <i>Age structure of tree cover:</i> <i>Extent of semi-natural habitat survival:</i> <i>Management of semi-natural habitat:</i> <i>Survival of cultural pattern:</i> <i>Impact of built development:</i> <i>Impact of land-use change:</i>		insignificant mature relic poor declining moderate low	<i>Impact of landform:</i> <i>Impact of land cover:</i> <i>Impact of historic pattern:</i> <i>Visibility from outside:</i> <i>Sense of enclosure:</i> <i>Visual unity:</i> <i>Distinctiveness/rarity:</i>	prominent dominant apparent locally visible exposed coherent frequent
CONDITION	GOOD	Strengthen and reinforce	Conserve and strengthen	Safeguard and manage
	MODERATE	Improve and reinforce	Improve and conserve	Conserve and restore
	POOR	Reconstruct	Improve and restore	Restore condition to maintain character
		WEAK	MODERATE	STRONG
		STRENGTH OF CHARACTER		

East Herts District Landscape Character Assessment - *Page 220*

3.1.12 Page 221 (Landscape Character Assessment SPD, East Herts Council) (CD 9.1) sets out the strategy and guidelines for managing change. The Proposed Development would contribute to these through creation of new woodland, hedgerows, and ponds.

3.1.13 The detailed assessment of landscape sensitivity of LCA 141 is provided in LVIA (CD 1.15.i) Appendix C – Landscape Effects Table and is summarised below:

- **Landscape value of LCA 141: High**, noting that it is a fairly frequent landscape type within the county, with no major distinctive characteristics. There is a moderate to sparse network of Public Rights of Way (PROW), with several of these providing links between the Rib Valley and the Ardeley/Cottered Settled Plateau. However, it is also noted that the local community is noted to regard LCA 141 as very distinctive and the LCA contains features and areas designated for landscape and scenic beauty. LCA 141 is a landscape area of common components and characteristics, some of which are designated locally for



their landscape and visual qualities. The assessment noted that LCA 141 makes a strong positive contribution to the landscape character of the region.

- **Landscape susceptibility of LCA 141: High**, recognising that LCA 141 is visible from the neighbouring plateaux and the upper slopes of the Rib Valley. The scale of LCA 141 is noted as being large with extensive exposed views and being mainly quiet and remote apart from where locally closer to the A507 and the A10 corridor. LCA 141 was appraised as likely to have little scope to accommodate residential development without undue consequences upon its overall integrity.
- **Landscape sensitivity of LCA 141: High**

3.1.14 The detailed assessment of landscape magnitude of change to LCA 141 is provided in LVIA (CD 1.15.i) Appendix C – Landscape Effects Table and is summarised below for the assessed periods:

- **During Construction: Magnitude - Very Small, Significance – Minor Adverse**, noting that there would be a very slight change to the LCA 141 which directly affects a very limited proportion of the receptor and that the construction works would be short-term. The judgement of significance as Minor Adverse is made because the negative changes to the character of LCA 141 during the construction phase would include the introduction of the construction equipment, structures and activity; the alterations resulting in a limited deterioration of LCA 141, and that its characteristic features will be lost to a limited degree.
- **Operational Phase (Completion) Year 1: Magnitude – Small, Significance – Minor Adverse**. The description of change noted the Proposed Development would occupy an area of undeveloped land adjacent to an existing settlement, which would represent a small increase in the built form and recreational opportunity within LCA 141. The changes to the perceptual aspects of the LCA would be appreciable from only a small proportion of its area. It was judged there would be a very slight change to LCA 141 which would directly affect a very limited proportion of the receptor as a long-term and irreversible change. The judgement of significance as Minor Adverse was made because at Year 1



the negative changes to the landscape character of LCA 141 resulting from the Proposed Development would include the introduction of residential built form into an area that is currently open, whilst the positive changes would include the increased recreational access; the alterations would result in a limited deterioration of LCA 141, and characteristic features would be lost to a limited degree.

- **Operational Phase Year 15: Magnitude – Small, Significance – Minor Beneficial.** The description of change noted at Year 15 the built form would be softened and integrated into the landscape of LCA 141 by the planting which would have become established with the assumption made that it would include the landscape strategy, as well as the improved management of the existing retained vegetation to improve its condition and longevity. At Year 15 there would be a very slight change to LCA 141 and which would directly affect a very limited proportion of the receptor as a long-term and irreversible change. The judgement of significance as Minor Beneficial was made because at Year 15, the negative changes to the landscape character of LCA 141 resulting from the Proposed Development would include the introduction of residential built form into an area that is currently open. The positive changes would include the increased recreational access, the improvements to the management of the existing vegetation, and the establishment of the planting which would contribute to improvement of the landscape and scenic qualities of the character of the LCA. As a result of factoring in these positive changes to the consideration of the landscape effect, the balance of the effect was considered to be beneficial. It was determined that at Year 15, the alterations would result in a limited improvement of LCA 141, and characteristic features would be restored to a limited degree.

Landscape Character of the Site and its Immediate Surroundings

- 3.1.15 The landscape character of the Appeal Site and its immediate surroundings is described in Section 2.2 of this proof.
- 3.1.16 The detailed assessment of landscape sensitivity of the character of the site and immediate surroundings is provided in LVIA (CD 1.15.i) Appendix C – Landscape Effects Table and is summarised below:



- **Landscape value of the character of the Site and immediate surroundings: Medium**, noting that the site does not exhibit a particularly high scenic quality, and acknowledging medium to long distance panoramic views available across the wider landscape; also that the Site and its immediate vicinity are broadly representative of the LCA within which it is located; and the Site and its immediate surroundings form a landscape area of common components and characteristics, which are undesignated and with little wider recognition of value.

- **Landscape susceptibility of the character of the Site and immediate surroundings : High**, recognising that the Site has a strong visual relationship with the landscape to the north, west and south; the composition of the Site is simple with some enclosure provided by mature vegetation; and the character of the Site and surroundings are influenced by the power lines within it and the transport corridors of the A10 to the east and the A507 to the south, which contribute audible intrusion. The character of the Site and its surroundings is also noted as being influenced by its relationship with the settlement edge of Buntingford. As such, residential development is already present near to the Site. The type of change proposed would therefore not introduce elements that are uncharacteristic of the Site's immediate context. The character of the Site and its immediate surroundings was considered likely to have little scope to accommodate residential development without undue consequences upon its overall integrity.

- **Landscape sensitivity of the character of the Site and immediate surroundings: High**

3.1.17 The detailed assessment of landscape magnitude of change to character of the site and immediate surroundings is provided in LVIA (CD 1.15.i) Appendix C – Landscape Effects Table and is summarised below for the assessed periods:

- **During Construction: Magnitude - Medium, Significance – Major Adverse**, noting that the scale and extent of construction activity in relation to the extent of the Site and its immediate surroundings, the change would be extensive to the receptor. However, the change will be short-term. The judgement of significance as Major Adverse is made



because the negative changes during the construction phase would include the introduction of the construction equipment, structures and activity; these being substantially uncharacteristic and a pronounced deterioration of the character of the site and immediate surroundings.

- **Operational Phase (Completion) Year 1: Magnitude – Large, Significance – Moderate Adverse.** The description of change noted the Proposed Development would occupy an area of undeveloped land adjacent to an existing settlement and would result in built form being introduced across part of the area within the Site, although there would also be an increase in the recreational opportunity within the Site. The changes to the perceptual aspects of the Site would be appreciable from within its vicinity. Therefore, there would be a pronounced change to the character of the Site and its immediate surroundings, and it would directly affect an extensive proportion of the receptor. The change would be long term and irreversible. At Year 1 the negative changes to the character of the Site and its immediate surroundings would include the introduction of residential built form into an area that is currently open; the positive changes would include the increased recreational access. Whilst there would be a pronounced change to the character of the Site and immediate surroundings, it was noted that this would be a settled residential development sensitively located within its landscape context. The alterations were judged on balance to result in a partial deterioration of the character of the Site and its immediate surroundings with valued characteristics partially lost.
- **Operational Phase Year 15: Magnitude – Large, Significance – Minor Adverse.** The description of change noted at Year 15 the built form would be softened and integrated into the landscape of the site and immediate surroundings by the planting which would have become established, with the assumption made that it would include the landscape strategy as well as the improved management of the existing retained vegetation to improve its condition and longevity. At Year 15, there would be a pronounced change to the character of the site and immediate surroundings which would directly affect an extensive proportion of the receptor and thus was judged as Large magnitude of change. The change would be long term and irreversible. The judgement of significance as Minor



Adverse was made because at Year 15, the negative changes to the character of the Site and its immediate surroundings would include the introduction of residential built form into an area that is currently open; positive changes would include the increased recreational access, the improvements to the management of the existing vegetation, and the establishment of the planting which would contribute to improving the landscape and scenic qualities of the character of the Site. As a result of factoring in these positive changes to the consideration of the effect, the level of the significance of the effect was noted to be reduced. At Year 15, the alterations were judged to result in a limited deterioration of the character of the Site and its immediate surroundings and noted that characteristic features would be lost to a limited degree.

3.2 LVIA Addendum and Landscape Effects on Landscape Character

- 3.2.1 Following a meeting with the Council's Landscape Officer (Place Services), additional visual assessment and visualisations from specified locations were requested. Visualisations were prepared by AVR London and submitted with a LVIA Addendum (CD 2.11.i) prepared by Stantec, as part of the Revised Planning Application.
- 3.2.2 The LVIA Addendum also included Stantec's response to the Council's Landscape Officer's comments on the Landscape Effects Assessment, as detailed in Section 2.2 of the LVIA Addendum (CD 2.11.i) and replicated below.
- 3.2.3 **LCA 141 Cherry Green Arable Plateau** – The introduction of built form on the Site, would be within a small part of the much wider LCA area, and notably only 40% of the Site area is proposed as new built form, with the remaining 60% of the Site proposed as green-blue infrastructure. The Proposed Development would therefore result in only limited change to some of the LCA's key characteristics. LVIA Addendum Figure L4A – Rev A - ZTV Plan (CD 2.11.iii and Appendix A of this proof) demonstrates the worst-case visibility of the Proposed Development, and that there would be limited visibility of the Proposed Development within the LCA 141 area. There is a greater extent of the LCA 141 area that would have no visibility of the Proposed Development, and therefore, contrary to the Council's Landscape Officer's (Place Services) comment, the Proposed Development is not considered to be "...a prominent



new feature into an undulating landscape, which will substantially change the baseline situation” of the LCA and its key characteristics.

- 3.2.4 The distinctiveness / rarity of LCA 141 is noted as being “...*a fairly frequent landscape type within the county with no major distinctive characteristics.*” In the description of landscape character, the LCA is described as, “...*principally, an open, arable landscape with extensive views over a gently undulating plateau. The area retains a historic ambience through the winding lanes, however many of the features have been eroded or disappeared completely.*”. The description also notes that, “*There are few features of note within the area with the most prominent landmarks being outside the area.*”
- 3.2.5 The magnitude of change during construction is considered to be Very Small, given that the developable area is a very small proportion of the LCA as a whole, the construction activity will be appreciable from only a small proportion of its area, and the construction period will not be long term or permanent. Construction activity is not a characteristic feature of the LCA. In combination with the high sensitivity of the LCA, this magnitude of change will result in a Minor Adverse significance of effect upon the key characteristics of LCA 141. The magnitude of change during the operational phase at Year 1 is considered to be Small, given that the area of the Proposed Development is a small proportion of the LCA as a whole the Proposed Development will be appreciable from within a small proportion of its area; although the change will be permanent. There is minimal settlement in the LCA, as noted in the published key characteristics; however, the Site is adjacent to the A10 and existing settlement edge of Buntingford. As opposed to construction activity, which has a character of upheaval, completed residential development is settled in character, limiting the level of significance of the effect. In combination with the high sensitivity of the LCA, this magnitude of change will on balance result in a Minor Adverse significance of effect at Year 1, but a Minor Beneficial significance of effect at Year 15 given the positive changes resulting from the landscape strategy.
- 3.2.6 **The character of the Site and its immediate surroundings** – The combination of the high sensitivity of the receptor and the large magnitude of change results in a Moderate Adverse significance of effect at Year 1. This is as a result of factoring into the assessment not only the



negative changes, but also the positive changes, including the substantial increase in recreational access across the Site, which is currently limited to a footpath across the centre of the Site, and another across the north-eastern corner of the Site. Additionally, as noted above, the introduction of built form on the Site, would be within only 40% of the Site area, and the remaining 60% of the Site is proposed as green-blue infrastructure. This change was considered to provide an appreciable improvement to the landscape amenity of the Site, weighed against the detrimental changes resulting from the Proposed Development, such that the resulting effect was considered to be less detrimental overall than if the proposals were not to include recreational access. As with the effects on LCA 141, whereas the construction phase would have a character of upheaval, it was noted that residential development is settled in character, again limiting the level of significance of the effect on balance.

- 3.2.7 At Section 3.3 of the LVIA Addendum (CD 2.11.i), the revised scheme of the Proposed Development as per the Revised Application was assessed and new or amended landscape and visual effects for the LVIA receptors in the Application LVIA (CD 1.15.i) were discussed, including an additional new footbridge proposed over the A10. The revised scheme was not considered to alter the findings of the landscape assessment, including those for landscape effects on LCA 141 and on the character of the site and immediate surroundings.



4 Landscape Policy Context

4.1 Introduction

- 4.1.1 Planning policy is dealt with in the Planning Proof of Evidence. In this section, I set out relevant landscape policies as cited in the landscape Reason for Refusal (RfR).

4.2 National Planning Policy Framework

NPPF (2024) (CD 5.16)

- 4.2.1 Paragraph 187(b) states:

“187. Planning policies and decisions should contribute to and enhance the natural and local environment by:...

...b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland...”

NPPF (2026)

- 4.2.2 I consider the relevant references and policies in NPPF 2026 to be:

- Chapter 4 Achieving sustainable development – the boxed text at the start of the chapter notes the objectives of the sustainable development policies, including, “*...and limiting development away from settlements to help safeguard the intrinsic character and beauty of the countryside.*” However, I note that NPPF 2026 paragraph 10 states, “*Short objectives are included in boxed text at the start of chapters for context only and should not be applied as either plan-making or decision-making policy.*”
- Policy S5 (1j): Principle of development outside settlements, criteria (i), where the development would “*Be physically well-related to an existing settlement (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure...*”



- Policy N2 (1a): Improving the natural environment – *“Consider the environmental qualities of land proposed for development, including habitats, landscape character and the natural beauty of the countryside, and identify opportunities for those qualities to be conserved or enhanced (including through requirements for biodiversity net gain where these apply).”*
- Policy N2 (1d): Improving the natural environment – *“Conserve and enhance existing natural features of visual historic or nature conservation value (such as trees and hedgerows) where possible; and use appropriate landscaping to help create a well-designed place and integrate development into its surroundings.”*

4.3 District Policy

East Hertfordshire District Plan 2011 - 2033 (2018) (CD 5.1)

4.3.1 The policies cited in the landscape RfR area GBR2 and DES2. These are set out below.

“Policy GBR2 Rural Area Beyond the Green Belt

I. 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:

(a) buildings for agriculture and forestry;

(b) facilities for outdoor sport, outdoor recreation, including equine development in

accordance with CFLR6 (Equine Development), and for cemeteries;

(c) new employment generating uses where they are sustainably located, in accordance with Policy ED2 (Rural Economy);

(d) the replacement, extension or alteration of a building, provided the size, scale, mass, form, siting, design and materials of construction are appropriate to the character, appearance and setting of the site and/or surrounding areas;

(e) limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings) in sustainable locations, where appropriate to the character, appearance and setting of the site and/or surrounding area;

(f) rural exception housing in accordance with Policy HOU4 (Rural Exception Affordable Housing Sites);

(g) accommodation for Gypsies and Travellers and Travelling Showpeople in accordance with Policy HOU9 (Gypsies and Travellers and Travelling Showpeople) or Non-Nomadic Gypsies and Travellers and Travelling Showpeople, in accordance with Policy HOU10 (New Park Home Sites for Non-Nomadic Gypsies and Travellers and Travelling Showpeople); (h) development identified in an adopted Neighbourhood Plan.”



“DES2 Landscape Character

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.”

4.4 Neighbourhood Plan Policy

Buntingford Community Area Neighbourhood Plan 2014 - 2031 (2017) (CD 5.2)

4.4.1 The policies cited in the landscape RfR are ES1 and HD2. These are set out below.

“ES1: Development proposals should be appropriate to and maintain the Rib Valley setting of the BCA.

Development on the fringes of Buntingford which extends on to the higher ground surrounding the Rib Valley could have a harmful effect on the landscape of this area and parts of the Cherry Green Arable and Wyddial Plateaux.

Policy HD2 provides guidance on the ridge heights of housing required to maintain the rural setting of the BCA within the Rib Valley and policy HD4 refers to specific design guidance that maintains a rural feel to new housing within the BCA.

The landscape value of this area is clearly stated in the East Herts District Landscape Character Assessment SPD of 2007 and in East Herts Draft District Plan January 2014 supporting documents. In discussing the strategy for managing change, the Landscape Assessment suggests that EHDC should “promote a strategy for reducing the visual impact of development on the upper slopes of Buntingford including the Sainsbury’s warehouses”.

“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. Where appropriate, a Landscape and Visual Impact Assessment should be provided to ensure that impacts, mitigation and enhancement opportunities are appropriately addressed.

Based on an analysis of the impact of new housing development in the BCA (Appendix 1), and in conformity with policy ES1 of this Plan to preserve and value the Rib Valley setting of the BCA, all new housing should be limited in height to a level that ensures that there will be no adverse impact on views from the surrounding countryside or on the character and appearance of the BCA.”



5 Responses to the Landscape Reason for Refusal and Disputed Matters

5.1 Landscape Reason for Refusal

5.1.1 The landscape related RfR states:

“2. The proposals by reason of scale, form, visual impact and siting on the west side of the A10 outside of the Buntingford Settlement Boundary, would intrude upon and have a significantly harmful urbanising impact upon the 'Cherry Green Arable Plateau' (LCA 141) character area within the East Herts District Landscape Character Assessment (2007). The development would also 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. As such the proposals comprise a substantial urban extension outside of and adjacent to Buntingford which encroaches into the rural area beyond the Green Belt. The development would therefore result in significant harm to the rural landscape character and would fail to recognise the intrinsic character and beauty of the countryside, conflicting with Policies GBR2 and DES2 of the District Plan (2018), Policies ES1 and HD2 of the Buntingford Community Neighbourhood Plan (2017) and paragraph 187(b) of the National Planning policy Framework.” [sic]

5.2 Settlement Form and the A10

5.2.1 To understand the historic evolution of the settlement form of Buntingford, I have reviewed historic maps, copies of which are set out at Appendix B, and I set out my descriptions and key points below.

5.2.2 The 1883-1884 map (see Figure 5.1) shows the form of Buntingford as ribbon settlement pattern along both sides of Ermine Street with rectilinear small fields set off the rear of dwellings. The settlement spans in a northerly direction from the point that Ermine Street crosses the River Rib. Ermine Street is an ancient and straight Roman road between London and York.



5.2.3 A cluster of buildings was located around River Green near to the River Rib. A workhouse was located to the southeastern edge of the settlement, and a vicarage, the railway station and Railway Inn, a gas works, and watermill were located to the south of the settlement, around Ermine Steet and to the east of the River Rib. These functional buildings and uses appear set apart from the residential area of the market town. To the west, and west of How Green, a well is noted on the map. Aspenden Hall and the village of Aspenden are to the southwest of Buntingford, and The Thicket woodland is included within the parkland of Aspenden Hall.

Figure 5.1: 1883-1884 County Series Map



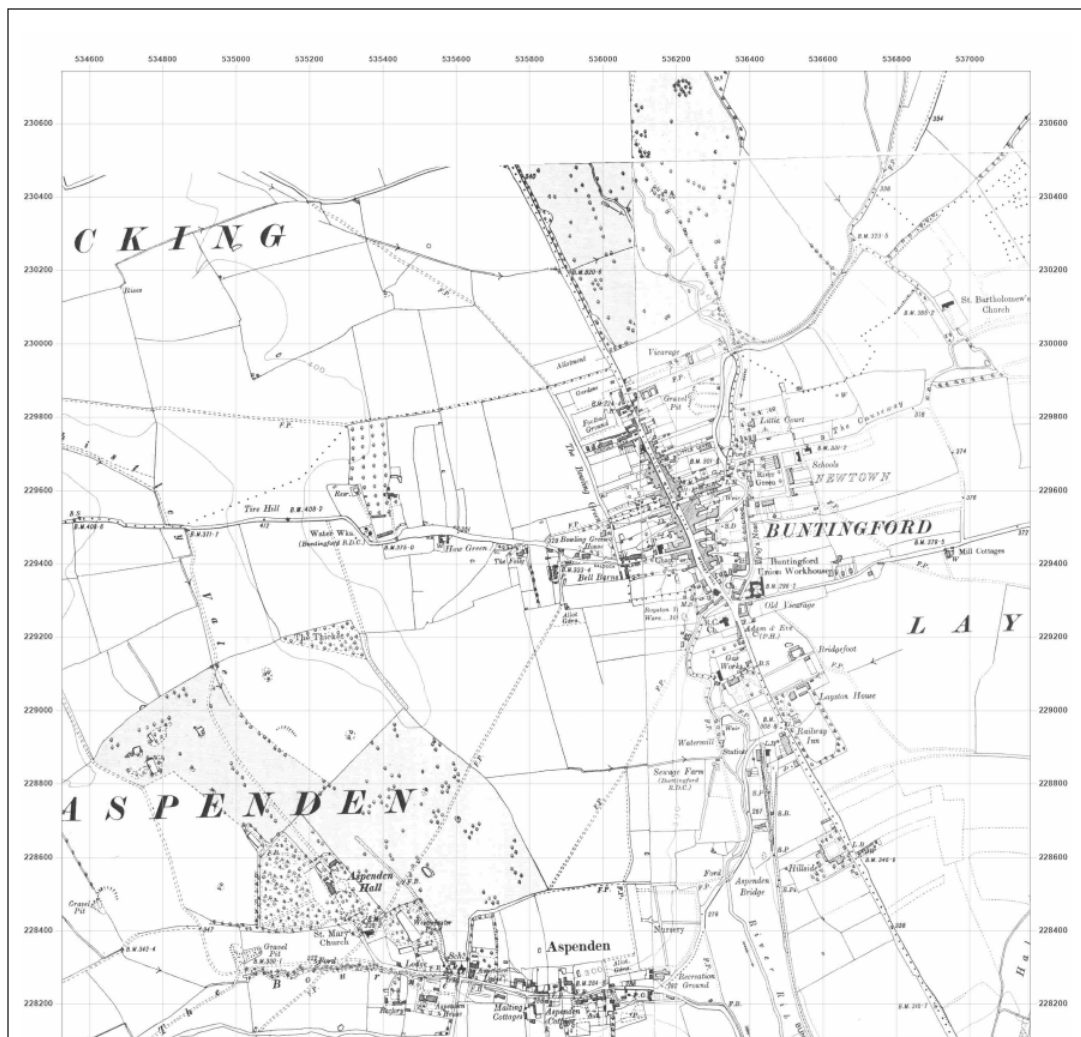
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5.2.4 The 1896-1899 map indicates little change to the settlement pattern.



5.2.5 The 1919-1924 map (see Figure 5.2) also shows little change to the overall settlement pattern, although a new street, Norfolk Road, and housing form a new spur from the west of the High Street (Ermine Street). The small rectilinear fields behind the housing on the western side of the High Street are shown to have changed into gardens, a football ground, and to the north an allotment area. To the west and between How Green and Tire Hill, is a water works and reservoir.

Figure 5.2: 1919-1924 County Series Map



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5.2.6 The 1948-1950 map (see Figure 5.3) labels the High Street and Market Hill (Ermine Street) as the A10, and post-war housing has emerged to the southeast of Buntingford, around River Green and Pig's Nose to Newtown, extending southwards to the B1035 and including the location of the former workhouse. This starts to change the fundamental settlement form of



Buntingford from a ribbon development to a cluster development pattern around the High Street and River Rib. Post-war housing is also mapped to the south of Buntingford and Bridgefoot, on the eastern side of the A10, though this appears to maintain some sense of separation from the southern edge of Buntingford. The railway and station remain on the western side of the A10 and to the east of the River Rib.

Figure 5.3: 1948-1950 County Series Map



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5.2.7 The 1951-1952 map shows the housing located to the south of Bridgefoot to be less and of a simpler geometric design than was shown on the earlier map. A school is located at The Bowling Green to the west of a new road which runs parallel to the A10 High Street (Ermine



Street), and to the west of that school parcel and north of How Green an area of housing is plotted.

5.2.8 The 1978-1981 National Grid map (see Figure 5.4) shows a step change in the form of the settlement, which appears as a clustered development around the A10 London Road / Station Road / High Street (Ermine Street). Housing areas have expanded to the south of the A507 Baldock Road, and new ribbon development extends southwards along the A10, infilling the historical gap. Housing has also extended northwards, out to the east of the A10. North of How Green Farm and the A507 Baldock Road, to the east of the reservoir, is Sunnyside Nursery. Buildings at Suncrest, north of Throcking Lane, appear on the plan for the first time.

Figure 5.4: 1978-1981 National Grid Map

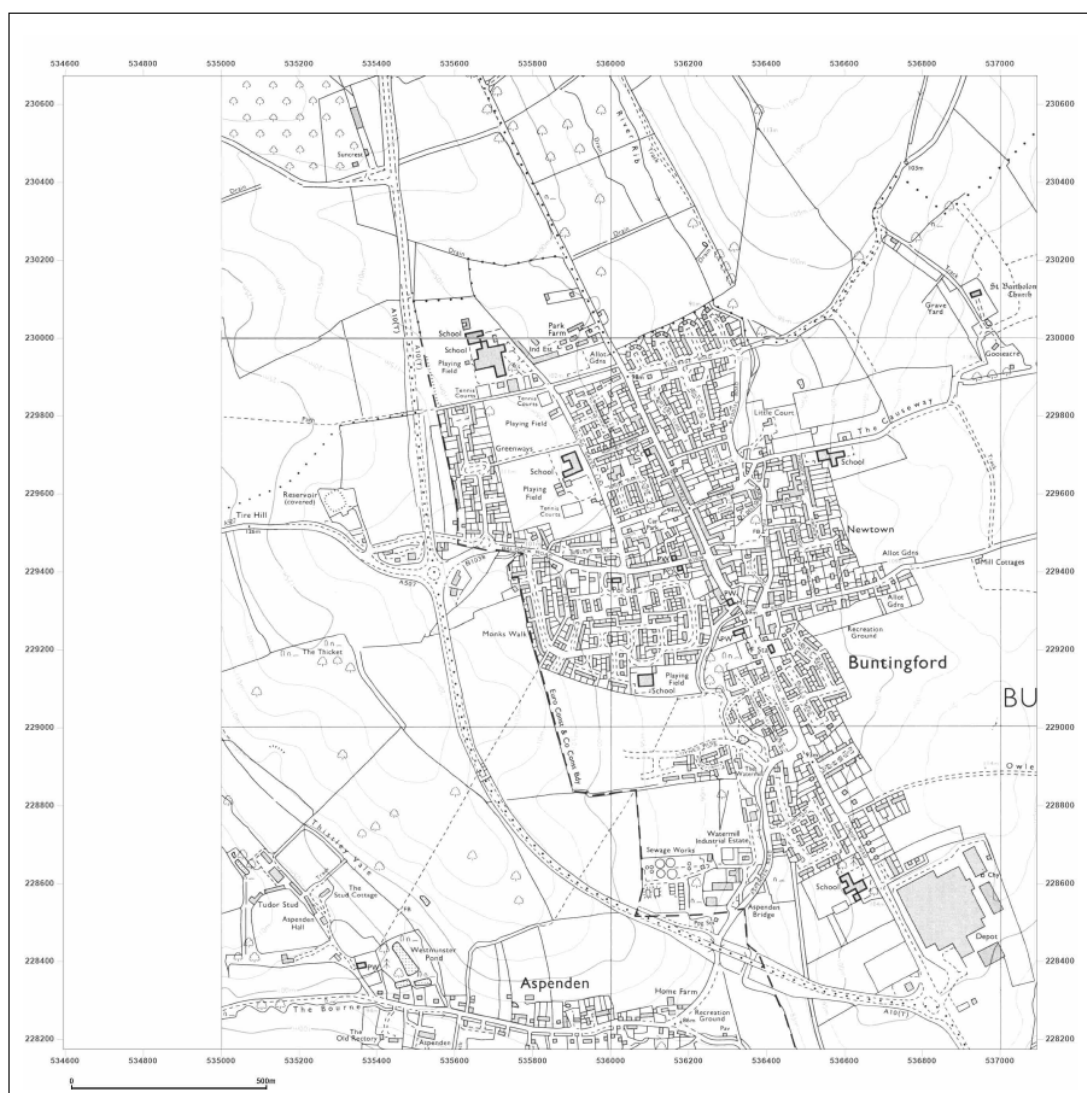


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5.2.9 The 1988-1992 National Grid map (see Figure 5.5) shows the new A10 trunk road which sweeps northwest from the A10 London Road (Ermine Street) at the south of Buntingford, south of a sewage works and north of Aspenden, in a northerly direction to cross the A507 Baldock Road at what was formerly labelled as How Green Farm and the Sunnyside Nursery, and eventually ties back into the High Street's A10 (Ermine Street) alignment to the north of Buntingford. Infill housing has occurred between roads within the town, for example on the former football ground in the north of the settlement, the area around the former Layston Lodge and at Dell Springs. A new industrial estate has been created adjacent to the sewage works at near Aspenden Bridge.

Figure 5.5: 1988-1992 National Grid Map



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5.2.10 The 2001 map shows little change; and the 2010 map also shows little change although more vegetation is shown on the plan.

5.2.11 The 2024 map shows additional housing areas to the north of Buntingford, between the eastern side of the A10 trunk road and the west of the High Street, and to the south of Buntingford infilling the area between Aspenden Road / Aspenden Bridge, the London Road and the A10 trunk road, as well as to the east of the London Road on the area formerly notated as a depot.

5.2.12 Since the 2024 map, housing developments have been consented in the following locations (see Appendix A, Figure NJ1: Landform and Settlement Analysis):

- 3/23/1447/OUT Land off Luynes Rise – 350 dwellings
- 3/24/0294/OUT Land North of Hare Street Road – 200 dwellings
- 3/23/1390/FUL Land off London Road – 68 dwellings (67 net)
- 3/22/1030/OUT Land off Neale Drive – 58 dwellings.

5.2.13 From this analysis of historical growth of Buntingford, I note that the settlement has evolved considerably from its original form of ribbon development along both sides of the main thoroughfare of Ermine Street Roman road, from where Ermine Street crossed the River Rib. Post-war and 1970s-80s housing broke out from the historic ribbon settlement that aligned the Ermine Street Roman road, extending the settlement initially to the west, and later to the east and south to form a cluster settlement pattern. This change as a result of modern housing over the last 50 years has notably altered the character of the settlement.

A10 Trunk Road

5.2.14 The A10 trunk road was opened in June 1987 as part of the main trunk road programme that ran from 1984 onwards. The A10 trunk road was constructed to ease traffic pressure on the High Street (Ermine Street) through the centre of Buntingford. After the A10 trunk road had opened, traffic calming and road narrowing measures were then put in place on the High Street, which remain today. As a result, the High Street is no longer a primary movement



route for vehicles passing beyond the settlement. However, parked motor vehicles still dominate the roadside within the centre of the settlement.

- 5.2.15 Despite an extensive search for the original reasons for the design and positioning of the alignment of the A10 trunk road by my team, we have not found any pertinent information, nor has any information been discovered to suggest that the original function of the A10 trunk road was to limit future development or growth of Buntingford. Mindful of transport policy at the time, it can reasonably be inferred that the intended function of the new trunk road was to divert traffic away from what would have been a highly congested High Street in the centre of the market town.
- 5.2.16 Reviewing historic maps dated between 1978 to 1992, (see Figures 5.4 and 5.5 above) it is seen that south of Buntingford, the A10 trunk road route diverts off the London Road (Ermine Street) historic route to the west, cutting across fields to a location between the village of Aspenden and development at Aspenden Bridge, sewage works and Watermill Industrial Estate. The A10 trunk road then continues north, continuing to dissect historic fields and aligning the westernmost edge of built form of the town; from which point it continues in a northerly direction to tie back into the historic A10 (Ermine Street) route. Historic maps are in Appendix B.
- 5.2.17 As can be seen on Figure NJ1, Appendix A, the A10 trunk road partially cuts across and partially follows along landform contours, with no obvious landform influence on the route's alignment, other than to accommodate the highway engineering requirements.
- 5.2.18 Reviewing the A10 trunk road route against the published LCA information (CD 9.1), it is noted that the LCAs were assessed with the A10 trunk road already in place and that the LCA boundaries do not fully align with it (see Figure NJ2, Appendix A). The A10 trunk road crosses through parts of LCA 142 High Rib Valley and LCA 141 Cherry Green Arable Plateau, and the remainder of the A10 trunk road roughly aligns with the boundary between LCA 142 High Rib Valley and LCA 140 Ardeley / Cottered Settle.
- 5.2.19 LCA 141 Cherry Green Arable Plateau crosses over the A10 trunk road into the existing western edge of Buntingford. The southern section of the LCA 142 High Rib Valley also



crosses over the A10 trunk road into the southwestern and southern edges of Buntingford, and includes Aspenden, Thistley Vale and The Thicket woodland, which was once part of the former Aspenden Hall parkland, and Westmill south of Buntingford.

5.2.20 The A10 trunk road reads in the landscape as a highly engineered, partly straight and partly curved road. Whilst there are variable levels of vegetation aligning the road corridor, the A10 trunk road does not obviously respond to landform or the historic pattern of landscape fields and field boundary vegetation.

5.2.21 Whilst there is some perception of the A10 trunk road acting as a boundary to Buntingford, this is a mis-guided ex post facto construct which, for the reasons described above, bears little to no relation to landform, published landscape character areas or the historic landscape pattern. The intended function of the A10 trunk road was to remove traffic from the historic High Street (Ermine Street) in the centre of the market town, not to act as a future barrier to the growth of the settlement.

5.2.22 In the East Hertfordshire District Plan 2011 – 2033 (CD 5.1), Buntingford Settlement Boundary is mostly drawn around the town's built limits, aside from part of the western Settlement Boundary which extends up to the edge of the A10 trunk road. That Settlement Boundary is now not up to date, due to planning consents for new housing development around the town since the District Plan was published, and which are located outside of the 2018 Settlement Boundary. I note however, the 2018 Settlement Boundary does not include Buntingford Business Park, which is situated west of the A10 and north of A507 Baldock Road, and the buildings of which can be partially seen from the A10 through vegetation. Therefore, in my opinion, the A10 does not in reality contain all of what is considered to be Buntingford.

5.2.23 The Appeal Site is located to the west of the A10 trunk road and published Buntingford Settlement Boundary and has been identified in the landscape RfR as intruding upon and urbanising the LCA 141 Cherry Green Arable Plateau character area and forming a substantial urban extension outside of Buntingford. As I have described above, the historic growth of Buntingford evolved through organic development expansion to both sides of the original A10 (Ermine Street) Roman road, such that the market town's settlement pattern



changed from ribbon settlement to cluster settlement. Development at the Appeal Site would simply be absorbed as a continuation of Buntingford's past growth in what has become a cluster settlement form, and the route of the A10 trunk road would be perceived as within the extended settlement area and crossed at appropriate points to help foster community integration.

5.3 LCA 141 Cherry Green Arable Plateau

- 5.3.1 The key characteristics and distinctive features that are identified for LCA 141 Cherry Green Arable Plateau in the East Herts Council Landscape Character Assessment SPD (CD 9.1) are set out at Paragraphs 3.1.9 and 3.1.10 of this proof.
- 5.3.2 I note that the LCA is described as being, “...*located on the elevated plateau between the valley of the River Rib to the east and the more settled plateau to the west...*” (page 218, East Herts Council Landscape Character Assessment SPD, CD 9.1), and the section about topography (page 219, East Herts Council Landscape Character Assessment SPD, CD 9.1) of the LCA notes, “...*There is a marked break of slope to the east where the plateau meets with the High Rib Valley...*”
- 5.3.3 On page 220 (Landscape Character Assessment SPD, East Herts Council (CD 9.1)), under the visual and sensory perception section, the text 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.*”
- 5.3.4 The proposed built form within the Appeal Site does not extend right up to the Appeal Site's western red line boundary. To the contrary, the western part of the Appeal Site is proposed as country park open space and the proposed built form would be confined to the central and eastern parts of the Appeal Site, adjoining the A507 and adjacent to the A10; and, because of the road corridors, as noted in LCA 141 text, this part of LCA 141 has less of a quiet and remote feel than the rest of the LCA.



- 5.3.5 The LCA 141 evaluation goes on to describe rarity and distinctiveness, stating “*The landscape is a fairly frequent landscape type within the county with no major distinctive characteristics.*”
- 5.3.6 Visual impact upon LCA 141 is described, stating “*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.*” Yet the photographic study of Appendix 1 of the BCANP (CD 5.2) notes that Buntingford “...*has impinged very little on the highly valued local landscape...*” (Appendix 1 of the BACNP (CD 5.2), page 65, paragraph 6.)
- 5.3.7 The evaluation section of the East Herts Council Landscape Character Assessment SPD (CD 9.1) identifies LCA 141 as Poor condition and Moderate strength of character, resulting in the strategy and guidelines for managing change to be Improve and Restore. The impact of built development on LCA 141 is noted in the evaluation section of the East Herts Council Landscape Character Assessment SPD (CD 9.1) as being ‘moderate’, and the impact of land-use change noted as ‘low’, as shown in Figure 3.3 of this proof.
- 5.3.8 Page 221 of the East Herts Council Landscape Character Assessment SPD (CD 9.1) sets out the strategy and guidelines for managing change. The Proposed Development would contribute to these through creation of new woodland, hedgerows, and ponds.
- 5.3.9 Figure NJ3: Zone of Theoretical Visibility Plan, Appendix A, indicates theoretical visibility of the Proposed Development, this being without the benefit of the landscape strategy and mitigation planting for the Proposed Development. Theoretical visibility of the proposed built form extends over part of LCA 141, but as it would be on east to northeast facing slopes most of the proposed built form would not be visible or perceptible from the areas of LCA 141 indicated on Figure NJ3. There is a greater extent of the LCA 141 area that would not have visibility of the Proposed Development, than would. Once the landscape strategy and mitigation planting has successfully established and is maturing, the visibility of the Proposed Development would be less than indicated on Figure NJ3.
- 5.3.10 The LVIA assessed LCA 141 as a landscape receptor with High sensitivity. I consider the judgement of landscape sensitivity of LCA 141 as a High sensitivity category takes the worst-case approach and is therefore a reasonable and appropriate judgement of sensitivity.



- 5.3.11 The assessment of change was judged as Minor Adverse significance during construction and at completion (Year 1), due to direct and adverse effects on a limited proportion of LCA 141. The LVIA assessed the landscape effect at Year 15 to be Minor Beneficial significance, this judgement took into account negative changes arising from the introduction of residential built form into an area that is currently open, as well as positive changes arising from additional recreational access, improved management of existing vegetation and the establishment and maturing of planting which would contribute to the LCA.
- 5.3.12 The Proposed Development would comprise an extension to the urban area within a small part of the northeastern area of LCA 141, and this would be at odds with the settlement characteristics of LCA 141. However, the proposed built form at the Appeal Site would be located where there is existing influence from the A507 and A10 road corridors and where there is some intervisibility with parts of the existing settlement of Buntingford. Additionally, I note that LCA 141 is described as a large-scale character area, which is not rare or distinctive.
- 5.3.13 Therefore, I consider that the Proposed Development's urbanising effect upon LCA 141 would be limited and would not substantially change or redefine the key characteristics of the LCA or affect the integrity of the distinctive features of LCA 141 Cherry Green Arable Plateau. I consider the findings of the landscape effects assessment to be as set out in the LVIA and subsequent LVIA Addendum.

5.4 Landscape Character of the Site and Immediate Surroundings

- 5.4.1 The character of the Appeal Site and immediate surroundings is described in Section 2.2. of this proof.
- 5.4.2 The LVIA assessed the character of the Appeal Site and its immediate surroundings as a landscape receptor with High sensitivity. The assessment of change was judged as Major Adverse significance during construction, due to direct and adverse effects on the receptor arising from construction activity, temporary structures and the scale and extents of activity. The LVIA assessed the landscape effect on this landscape receptor at completion (Year 1) to be Moderate Adverse significance, acknowledging negative aspects of change from the introduction of residential built form into an area that is currently open and positive aspects of



change from increased recreational access, with partial deterioration and loss of characteristics of the receptor.

- 5.4.3 As previously noted in the LVIA Addendum, the introduction of built form on the Site, would be within only 40% of the Site area, and the remaining 60% of the Site is proposed as green-blue infrastructure. This change was noted in the LVIA Addendum to provide an appreciable improvement to the landscape amenity of the Site, which was weighed against the detrimental changes resulting from the Proposed Development, such that the resulting effect was considered to be less detrimental overall than if the proposals were not to include recreational access.
- 5.4.4 At Year 15, the LVIA assessed the landscape effect on this receptor as Minor Adverse significance, this judgement considering negative changes to the character of the Appeal Site and immediate surroundings arising from built form into an area that is currently open, as well as positive changes arising from additional recreational access, improved management of existing vegetation and the establishment and maturing of planting.
- 5.4.5 These positive aspects of change relate to maturing planting and green infrastructure within the Appeal Site, which I consider would contribute to the Hertfordshire Green Infrastructure Strategy Priorities for Theme 1: A Resilient Landscape – 1A Expand tree coverage and enhance woodland connectivity; Theme 3: Nature Recovery – 3B incorporate biodiversity into existing and future new developments in accordance with BNG requirements; and Theme 4: Access and Connectivity – 4A Reconnect and create multifunctional links, as well as contribute to the strategy and guidelines for managing change that are set out for LCA 141, namely creation of new woodland, hedgerows, and ponds. The negative aspects of change to the character of the Site and its immediate surroundings was considered to include the introduction of residential built form into an area that is currently open. Overall, the alterations are judged to lead to limited deterioration of the receptor with characteristic features of the site and immediate surroundings lost to a degree.
- 5.4.6 I consider the findings of the landscape effects assessment for the character of the site and immediate surroundings to be as set out in the LVIA and subsequent LVIA Addendum.



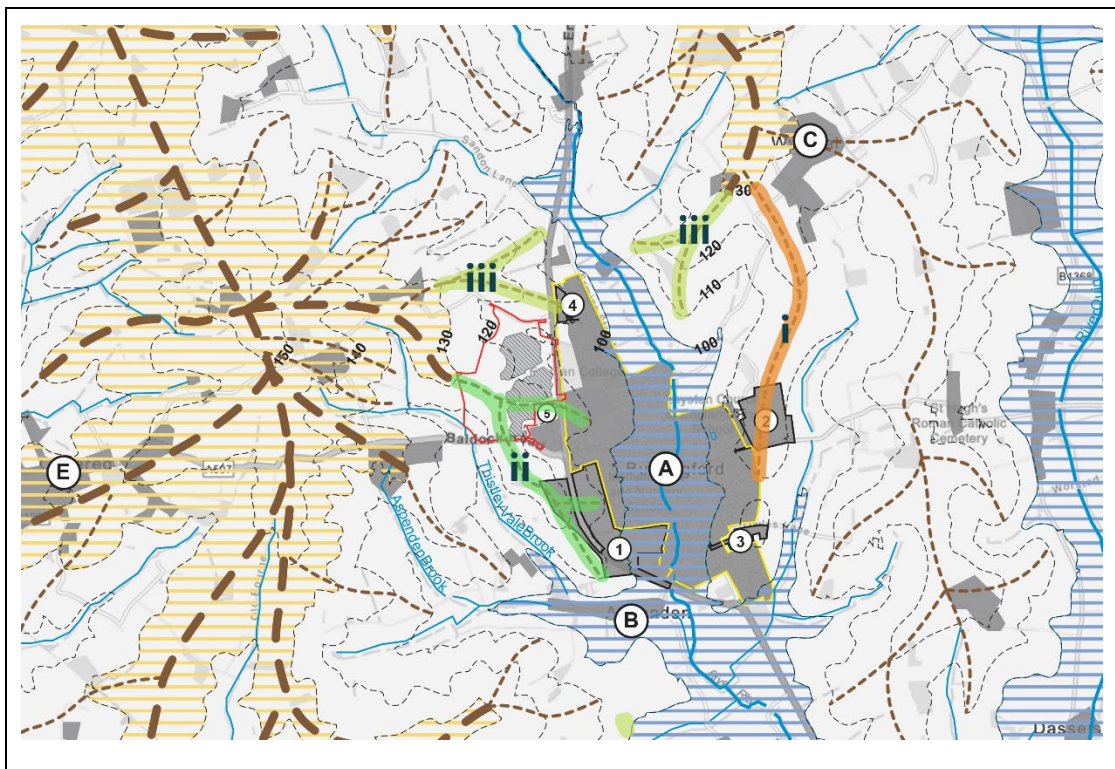
5.5 Rib Valley Setting

- 5.5.1 Figure NJ1: Landform and Settlement Analysis Plan, Appendix A, illustrates the valley floor around the River Rib between 90m to 100m AOD. Contours have been produced for this plan at 10m intervals using LiDAR data (LiDAR Composite DTM 1m grid 2022). Additionally, the highest levels between 130m to 150m+ AOD are highlighted to illustrate the elevated, gently undulating dissected plateau. Ridgelines along the highest points of landform and spurs projecting outwards and down from the ridgelines are also marked on the plan.
- 5.5.2 The plan also identifies the locations of settlements. The area of Buntingford which is shown on the plan includes the existing town as per the current map base, with the addition of recently consented developments as listed at paragraph 5.2.12 and includes Buntingford Business Park. The Buntingford Settlement Boundary, identified in the East Herts District Plan 2011 – 2033 (2018) (CD 5.1), is also shown on Figure NJ1 for context.
- 5.5.3 As previously described in Section 5.2 above, Buntingford has evolved from its original form of ribbon settlement that aligned the Roman road in the valley floor into a cluster settlement pattern. As shown on Figure NJ1, Appendix A and Figure 5.7 below, the settlement, including the recently consented developments, has grown over time across the valley floor and then up onto the valley slopes, including extending up to the highest parts of a spur of landform. The exception relates to very recent development on the eastern spur of landform which projects in a southerly to southwesterly direction (see orange highlight line, labelled i, in Figure 5.7 below) from a ridgeline that is located to the north-northeast of Buntingford. This recently consented development, 3/24/0294/OUT Land North of Hare Street Road comprises 200 dwellings and extends over the crest of the eastern spur, onto east to southeast facing slopes.
- 5.5.4 To the west, beyond the existing built edge of Buntingford, including the Buntingford Business Park, is a spur of landform (hereafter referred to as ‘the western spur’ – see dark green highlight line ii on Figure 5.7 below) which projects in a southeasterly direction from a ridgeline that extends from the elevated and gently undulating plateau situated further to the west (yellow hatching on Figure 5.7 below). That western dissected plateau contains several small settlements and the larger settlement area of Cottered (labelled E in Figure 5.7 below) which



is located at the top of the elevated plateau landscape, all of which are part of the Buntingford Community Area. The western spur which wraps around Buntingford has shorter spurs extending eastwards over the A10 and into the Buntingford urban area. To the north of Buntingford, there are spurs of landform situated to the northeast and northwest (pale green highlight lines **iii** in Figure 5.7 below), which project from plateau ridgelines. Buntingford Business Park is to the south of label 5 in Figure 5.7 below.

Figure 5.7: Extract of Figure NJ1: Landform and Settlement Analysis with Landform Spurs Highlighted



5.5.5 This series of landform spurs form a topographical landscape cell which wraps around and contains the River Rib valley slopes, the valley floor, and Buntingford (hereafter referred to as the 'Rib valley landscape cell').

5.5.6 The BCANP (CD 5.2), at page 17, states,

"Buntingford, situated in the Rib valley, provides many of the amenities for the Community: most of these amenities are only just sufficient for current needs.

Post war development has mainly followed the valley setting, especially to the east, ensuring the eastern skyline still reflects the town's rural setting. Developments of the late 20th century



(60's to 90's) namely Vicarage Road, Monks Walk, Downhall Ley, Fairfield, Snells Mead and Luynes Rise are generally well laid out and incorporate mature trees and some green spaces. Later developments give an impression of over-crowding. The Causeway, a road from the River Rib past Layston School leading to Layston Church (St Bartholomew's), is of particular interest as it is lined both sides with mature trees. There is concern that any development adjacent to this roadway may impact on its natural beauty and will spoil the eastern skyline. The villages within the BCA are mainly residential with property sited along or just off their main street. They are surrounded by significant areas of agricultural land and were originally based within the farming community. All are provided with open green spaces and mature trees but there are certain types of green space that are underprovided in the area."

- 5.5.7 Additionally, page 65 of the BCANP (CD 5.2), Appendix 1 – Buntingford and the Landscape of the East Herts Plateau, paragraph 2, states:

"Buntingford is situated in the High Rib valley which is one of several running approximately north to south from the northern part of the area known as the East Herts Plateau (see fig.02 'Landscape Regions of Hertfordshire' in reference 1). Chapter 5 of the East Herts District Plan Supporting Document (reference 2) states in para 5.3.32 "Buntingford sits astride the River Rib on the road from London to Cambridge, halfway between Ware to the south and Royston to the north, in the rural north of the district. The town is located in a rural landscape characterised by the narrow valley of the river Rib nestling in elevated plateaus."

- 5.5.8 Appendix 1 of the BACNP (CD 5.2) states at page 65, paragraph 6 that its aim is 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."*

- 5.5.9 The paragraph continues, *"...The appendix also sets out to indicate what restrictions should be placed on new building so as to preserve the landscape setting of the Town and maintain this situation."*

- 5.5.10 A photographic study is set out in the BCANP Appendix 1 (CD 5.2), presenting wide-angled photographs with enlarged extracts with notations, as an appraisal of the landscape setting of



Buntingford seen in a variety of views, which are presumed to be notable. There is no methodology provided for these photographs, but which does not appear to have followed published guidance for photography to appraise or assess the landscape and development within it, such as Landscape Institute Technical Guidance Note 06/19: Visual Representation of Development Proposals (Landscape Institute, 2018). The written analysis of views provided in the BCANP Appendix 1 (CD 5.2), is simply descriptive with judgements made about impacts of development on the views; however, there is no transparent methodology, and the analysis has not been prepared using published best practice guidance such as the Guidelines for Landscape and Visual Impact Assessment, Third Edition (Landscape Institute and IEMA, 2013) or subsequent clarifications. It appears to be little more than a series of subjective judgments.

- 5.5.11 Paragraph 2, page 71, BCANP Appendix 1 (CD 5.2), opens discussion of the photographic study, stating:

“The result 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...”

- 5.5.12 Paragraph 4, page 71 BCANP Appendix 1 (CD 5.2), go on to discuss views D and E of the photographic study, showing an area between the then edge of Buntingford and the A10 which, at the time the BCANP was being prepared, was proposed for new housing:

“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, which is clearly shown in the view from point C.”



5.5.13 The area of proposed housing which Appendix 1 of the BCANP (CD 5.2) referred to has since received planning consent for 350 dwellings, and is shown on Figure NJ1 as 3/23/1447/OUT Land off Luynes Rise. I note that the proposed housing for this consented development would extend up to the western spur.

5.5.14 Paragraph 1, page 72 BCANP Appendix 1 (CD 5.2) concludes,

“...Thus there does seem to be a degree of support for ensuring that the future development of Buntingford is carried out in such a way that the landscape views across the Town are not adversely affected. This requires that building on higher ground is limited in height and that any further housing is developed within the valley setting.”

5.5.15 The Appeal Site is located to the west of existing housing at Buntingford and to the north and northwest of the Buntingford Business Park. Figure NJ1, Appendix A and Figure 5.7 above, shows the Appeal Site's red line, and within that the areas which are proposed for new built form are identified as a grey tone with diagonal hatch.

5.5.16 This illustrates that the proposed new built form of the Appeal Site would be located to the east of and, crucially, below the western spur, as well as south of the short spur located to the northwest of Buntingford and thus would be contained within the Rib valley landscape cell formed by the series of spurs which wrap around and contain the River Rib valley slopes, the valley floor, and Buntingford. Therefore, the proposed new built form of the Appeal Site would be developed within the valley setting, thereby emulating the predominant character of the development of the settlement in the last 50 years. Furthermore, I consider that sensitively designed new built form contained within the Rib valley landscape cell that contains Buntingford is an appropriate approach to avoid far reaching impacts on the wider, rural landscape and the more open and elevated plateau landscape to the west.

5.5.17 Whilst such morphological considerations to the evolution of a settlement will rarely be evident to local residents based upon a detailed consideration of the form of the surrounding landform of Buntingford; in reality it will be apparent to future residents that the location of the proposed development 'fits in with the landscape' and is therefore in keeping with the form of the settlement and its setting.



- 5.5.18 Were it not for the existence of the A10, and in particular the fact that it is in cutting adjacent to the Site, it is all but inconceivable that the Council would seek to argue that the form and location of the development proposed was out of keeping with the existing settlement pattern. The issue is therefore how the A10 would be perceived once the development has been constructed. My colleagues address the degree of integration from a transport and accessibility perspective, but from a townscape perspective having a 40mph A road passing between two parts of a settlement of this scale, even in cutting, would not result in an incongruent settlement form. To the contrary, how well the proposals would fit into the landscape is far more complex than simply asking whether the proposals lie on one side of an A road or not.
- 5.5.19 The visualisations in Appendix C of the LVIA Addendum (CD 2.11.vi and Appendix A, Figure NJ5 of this proof) which were submitted with the revised application, were produced in response to a request from the Council to demonstrate the Proposed Development in views from locations to the west of the Appeal Site, looking eastwards – these locations are identified as VL B and VL C on Figure L4 in Appendix A of the LVIA Addendum (CD 2.11.ii). Referring to Figures NJ1 and NJ4 of this proof, I note that the views at VL B and VL C are from part of the higher landform of the gently undulating plateau and its edge (yellow hatching on Figure 5.7 above and Figure NJ1), which is situated to the west of the Appeal Site. View B is located at around 143m AOD, and View C is located at around 135m AOD.
- 5.5.20 Both views look in an easterly direction to the western and northwestern spurs of the Rib valley landscape cell, and beyond in the distance to the eastern spur and the rising higher land situated beyond that. These views are of a settled landscape with isolated dwellings, farmsteads, power lines and pylons across the skylines, mobile phone mast, and limited views of parts of the existing settlement of Buntingford in the lower lying parts of the Rib valley, with agricultural land, trees and hedgerows forming the landscape setting.
- 5.5.21 The Proposed Development would inevitably bring housing closer to the viewer at these locations; however, the visualisations demonstrate that this would be congruent with the landscape and that maturing planting would provide effective mitigation to soften and filter the appearance of new housing and rooflines of the proposed built form in the long-term. AVR02



in Appendix C of the LVIA Addendum (CD 2.11.vi and Appendix A, Figure NJ5 of this proof) demonstrates that the background skyline is retained in the view. The visualisations demonstrate that the maturing planting would also screen and soften views of the existing housing in the north of Buntingford which is visible in the baseline view. It can be seen from the visualisations that the Proposed Development would not dominate, nor completely change, the views from these locations, and that the maturing planting would help to integrate the housing within the landscape, just as other modern development around the settlement would be accommodated by mitigation planting in due course.

5.6 Environmental & Planning Constraints to Development around Buntingford

- 5.6.1 Appendix A, Figure NJ4 HLM082-055 Rev A: Constraints Plan (Northern Parcel), prepared by David Lock Associates, maps the environmental and planning constraints for Buntingford and the surrounding area.
- 5.6.2 It can be seen on Figure NJ4 that within the Rib valley landscape cell which wraps around and contains the valley slopes, the valley floor of the River Rib, and Buntingford, there are few areas without existing development or settlement land uses which are free from environmental or planning constraints and which face into that landscape cell. Built form in areas outside of this landscape cell, which extend beyond the highest parts of the northern, eastern and western spurs, and face outwards, would breach the containment of the valley and therefore would have greatest effects on the wider landscape beyond.
- 5.6.3 Figure NJ 4 demonstrates that the areas in the Rib valley landscape cell that have fewest mapped constraints and thus greatest opportunity are:
- i. valley slopes below the northern and western spurs, including the Appeal Site in LCA 141 Cherry Green Arable Plateau
 - ii. a narrow area in the valley floor to the east of Ermine Street and south of Corney Bury Listed Buildings and in LCA 142 High Rib Valley, although I note much of this narrow area is identified as an area of archaeological significance.



- iii. valley slopes below the northern and eastern spurs, to the west and south of Parkhill Plantation and north of the Conservation Area, and in LCA 142 High Rib Valley and LCA 143 Wyddial Plateau.

5.6.4 The East Herts Council Landscape Character Assessment SPD (CD 9.1) includes descriptions of each LCA's rarity and distinctiveness and an evaluation of each LCA's condition and strength of character, with resulting identification of strategy and guidelines for managing change. These aspects for the LCAs which surround and abut Buntingford, are summarised below:

- LCA141: Cherry Green Arable Plateau – Rarity: fairly frequent, no major distinctiveness. Poor condition, Moderate strength of character with Improve and Restore as the management strategy.
- LCA142: High Rib Valley – Rarity: fairly unusual in the county. Moderate condition, Moderate strength of character with Improve and Conserve as the management strategy.
- LCA143: Wyddial Plateau – Rarity: fairly frequent, the most distinctive feature is noted to be the immediate environment of Wyddial Hall. Moderate condition, Moderate strength of character with Improve and Conserve as the management strategy.

5.6.5 This demonstrates that the Appeal Site is the least constrained area of opportunity for development within the Rib valley landscape cell. The existence of the A10 does not alter that conclusion.

5.7 Policies GBR2 and DES2 of the East Hertfordshire District Plan 2011 - 2033 (CD 5.1)

GBR2 Rural Area Beyond the Green Belt

5.7.1 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 (CD 5.1). The Rural Area Beyond the Green Belt is an area of the District noted within Policy GBR2 to comprise a valued countryside resource. The GBR2 policy applies to all land in the district which is not designated within a Settlement Boundary, and which is not Green Belt. Paragraph 4.6.1 of the



District Plan (CD 5.1) notes, *“Green Belt in East Herts covers approximately one-third of the District. The remaining two-thirds of the District are located in the ‘Rural Area Beyond the Green Belt’.”*

- 5.7.2 Policy GBR2 restricts the type of development which is permitted within the Rural Area Beyond the Green Belt, regardless of their landscape and visual impact. This matter is dealt with in the planning evidence of Gary Stephens, Marrons.

DES2 Landscape Character

- 5.7.3 I consider that the Proposed Development would contribute to conserving, enhancing or strengthening the character and distinctive features of the district's landscape for the reasons set out below.
- 5.7.4 The proposed built form within the Appeal Site would be located to the east of and, crucially, below the western spur of landform, as described at Section 5.5 above, and therefore would be contained within the Rib valley landscape cell formed by the series of spurs which wrap around and contain the River Rib valley slopes, the valley floor, and Buntingford. This positioning of proposed built form was acknowledged as being an appropriate approach in the Council's Landscape Officer (Place Services) consultation response dated 20/09/2024 (CD 4.23) which states, *“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...”* (3rd bullet, page 7 of consultation response). In addition, the summary of the Design South East Design Review Panel report dated 09/10/2024 (CD 4.24) 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”*.
- 5.7.5 The proposed area of built form within the Proposed Development avoids slopes which face outwards into the adjacent landscape cell to the west and avoids the more elevated land of the open plateau landscape and the ridgeline which Cottered is situated upon as can be seen on Figure NJ1, Appendix A.



- 5.7.6 The proposed area of built form within the Appeal Site avoids building on the higher ground of LCA 141 and would be located within the Rib valley setting.
- 5.7.7 The Proposed Development would not fundamentally alter or redefine the published LCA 141 key characteristics, although I acknowledge it would be at odds with the settlement characteristics of LCA 141 as previously noted. It also would not alter the published distinctive features of LCA 141.
- 5.7.8 The Proposed Development is not located within LCA 142: High Rib Valley or LCA 143: Wyddial Plateau, both of which are identified as Moderate condition and Moderate strength of character. It is located within a small part of LCA 141: Cherry Green Arable Plateau, which is identified as Poor condition and Moderate strength of character, and is a fairly frequent LCA with no major distinctiveness.
- 5.7.9 As I have previously set out, the Appeal Site is located within the least constrained area of opportunity for development within the Rib valley landscape cell, as shown on Figure NJ4, Appendix A).
- 5.7.10 The areas of built development within the Proposed Development are located in the central and eastern parts of the Appeal Site, which are nearest to the A10, the existing built edge of Buntingford, and Buntingford Business Park. This was acknowledged as being an appropriate approach in the Council's Landscape Officer (Place Services) consultation response dated 20/09/2024 (CD 4.23), which states, *"We note this is 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."* (last paragraph, page 3 of consultation response). The proposed country park area is located to the western side of the Appeal Site, as shown on Figure NJ6, Appendix A.
- 5.7.11 The planning application was accompanied by the LVIA (CD 1.15.i) which identified likely effects of the Proposed Development on landscape and visual receptors, and the Landscape Mitigation Strategy Plan (CD1.6). Subsequently, and following the Council's initial consultation comments, the LVIA Addendum (CD 2.11.i) was provided along with an updated Landscape



Mitigation Strategy Plan (CD 2.11 iv and Figure NJ6, Appendix A) and visualisations prepared by AVR London (CD 2.11.vi and Figure NJ5, Appendix A) to accompany the revised planning application. The LVIA and LVIA Addendum took mitigation measures into account when considering the effect of development on landscape character.

- 5.7.12 The Proposed Development has potential to contribute to the Hertfordshire Green Infrastructure Strategy Priorities for Theme 1: A Resilient Landscape – 1A Expand tree coverage and enhance woodland connectivity; Theme 3: Nature Recovery – 3B incorporate biodiversity into existing and future new developments in accordance with BNG requirements; and Theme 4: Access and Connectivity – 4A Reconnect and create multifunctional links. Additionally, the Proposed Development has potential to contribute to the strategy and guidelines for managing change in LCA 141 through the creation of new woodland, hedgerows, and ponds.

5.8 Policies ES1 and HD2 of the BCANP (2017) (CD 5.2)

- 5.8.1 I consider that the Proposed Development meets the requirements of these policies for the reasons I have already set out in Paragraphs 5.7.3 to 5.7.12 above.

5.9 NPPF and Degree of Protection

- 5.9.1 The Council's Statement of Case (CSoC) at paragraph 4.11 references Paragraph 187(b) of the NPPF (CD 5.16), and CSoC paragraph 4.12 references the *Cawry Ltd v SoSCLG* [2016] EWHC 1198 (Admin) (CD 8.1) judgement and the *Alwyn De Souza v SoSCLG* [2015] EWHC 2245 (Admin) (CD 8.2) judgement in relation to the recognition of intrinsic character and beauty of the countryside imparting a degree of protection to those matters. The Council states at 4.12 CSoC:

“...Such protection and the degree of protection will be commensurate to the circumstances of the countryside, its contribution and its condition and quality. In the case of this site the Council considers the degree of protection should be at a high level.”

- 5.9.2 I acknowledge that NPPF 2026 policy N2 (1a) requires the environmental qualities of land proposed for development to be considered, including landscape character and the natural beauty of the countryside. However, I disagree with the Council that the degree of protection



applied to the Appeal Site should be at a high level. The Appeal Site does not lie within a Protected Landscape designation or local landscape designation, nor within any environmental designations, which would warrant a degree of protection at a high level.

- 5.9.3 I note that in paragraph 47 of *Borough of Telford and Wrekin v Secretary of State for Communities and Local Government and Gladman Developments Limited* [2016] EWHC 3073 (Admin) (CD 8.4), the judgement found that, “...*the Inspector did not err in law in concluding that Policy CS7 was not in conformity with the NPPF and so was out-of-date. It is a core planning principle, set out in NPPF 17, that decision-taking should recognise “the intrinsic character and beauty of the countryside and supporting thriving rural communities within it”. This principle is reflected throughout the NPPF e.g. policy on the location of rural housing (NPPF 55); designation of Local Green Space (NPPF 76); protection of the Green Belt (NPPF 79 – 92) and Section 11, headed “Conserving and enhancing the natural environment” (NPPF 109- 125). However, NPPF does not include a blanket protection of the countryside for its own sake, such as existed in earlier national guidance (e.g. Planning Policy Guidance 7), and regard must also be had to the other core planning principles favouring sustainable development, as set out in NPPF 17.*”
- 5.9.4 I have already identified that the Appeal Site is within LCA 141, that the East Herts Council Landscape Character Assessment SPD (CD 9.1) notes LCA 141 is large-scale, it is not described as rare or having major distinctiveness and was evaluated in the East Herts Council Landscape Character Assessment SPD (CD 9.1) as being of Poor condition with Moderate strength of character. The Appeal Site is subject to existing urban influence from the A507 and A10 road corridors and where there is some intervisibility with parts of the existing settlement of Buntingford. The Appeal Site is adjacent to the A507 and A10 road corridors and the East Herts Council Landscape Character Assessment SPD (CD 9.1) notes that LCA 141 has a “...*mainly quiet and remote feel apart from where locally closer to the A507 and A10 corridor*” (page 220).
- 5.9.5 Overall, the Appeal Site does not exhibit a high landscape quality or condition, as although typical landscape character is represented and it has a moderate level of intactness, the condition of individual elements is highly variable, with some hedgerows being gappy or



denuded in places. The Appeal Site does not exhibit high scenic quality and is representative of the wider agricultural landscape. The Appeal Site does not exhibit wildness and is an intensively managed agricultural land use.

- 5.9.6 Both parties have agreed in the Landscape SoCG (CD 15.4) that the Appeal Site does not comprise a 'valued landscape' for the purposes of 187(a) NPPF (CD 5.16) which protects a 'valued landscape'. I note that NPPF 2026 does not carry forward specific reference to valued landscapes.

5.10 NPPF 2026 Policy S5 (1j)

- 5.10.1 Policy S5 lists the forms of development outside of settlement which should be approved unless the benefits are substantially outweighed by adverse effects. The evidence of Gary Stephens in respect of planning matters identifies the need to consider whether Policy S5 (j) applies as the Proposed Development would address an unmet need for housing. Policy S5 (1j) criteria (i), notes development is required to "*Be physically well-related to an existing settlement (unless the nature of the development would make this inappropriate) and be of a scale which can be accommodated taking into account the existing or proposed availability of infrastructure...*". I note that Policy S5 (1j) criteria (i) does not require a site to adjoin a settlement, but to be 'physically well-related' to it.

- 5.10.2 In landscape and visual terms, it is my opinion that the Proposed Development would be physically well-related to the existing settlement of Buntingford for the following reasons:

- It is closely connected to the existing built form of Buntingford and the eastern part of the Appeal Site is experienced as part of the settlement edge.
- The Appeal Site is subject to existing urban influence from the A507 and A10 road corridors and where there is some intervisibility with parts of the existing settlement of Buntingford.
- The Proposed Development would appear as an appropriate continuation of Buntingford's growth and be in keeping with the existing cluster settlement pattern of Buntingford within the Rib valley setting.



- There is already, and always has been, built development on both sides of the A10. The Proposed Development is adjacent to Buntingford Business Park, which is situated on the west side of the A10. Historically, there has been some form of development west of the A10 in addition to a Reservoir, as can be seen on Figure 5.5: 1988-1992 National Grid Map, which illustrates a small amount of built form located to the west of the A10 and adjacent to the A507 / A10 roundabout, which is now the southern end of the current Buntingford Business Park.
- There are existing PROW connections between Buntingford and the Appeal Site, which would be retained within green corridors as part of the Proposed Development: PROW Cottered 41, which passes through the north-eastern part of the Site, connecting Throcking Lane to PROW Buntingford 35 crossing the A10 at grade; and PROW Cottered 40 which runs east/west through the centre of the Site, connecting PROW Cottered 39, which is to the west of the Site, with PROW Buntingford 36 to the east of the Site, crossing the A10 via an existing pedestrian bridge. The Proposed Development includes the provision of two additional bridges – the evidence of Peter Blair provides further information regarding the pedestrian and cycle connections for the Proposed Development.
- When the Proposed Development is built out, the A10 would simply be viewed as part of the settlement's urban structure. The A10 does not provide complete visual containment and enclosure to the existing settlement, which is demonstrated where there is intervisibility between the Appeal Site and existing built form of Buntingford.
- There would be no intervening open countryside between the Proposed Development and Buntingford.

5.10.3 Furthermore, as I have described in Section 5.5, the area of built form within the Proposed Development would be contained within the Rib valley landscape cell and valley setting, as is the existing settlement of Buntingford, thereby emulating the predominant character of the development of the settlement in the last 50 years.



5.10.4 For the reasons set out above, I conclude that the Proposed Development would be physically well-related to Buntingford in landscape and visual terms.

5.11 NPPF 2026 Policy N2 (1a)

5.11.1 Policy N2 (1a) requires the environmental qualities of land proposed for development to be considered, including landscape character and the natural beauty of the countryside, and the identification of opportunities for those qualities to be conserved or enhanced.

5.11.2 As I have described in Section 5.6, there are few areas without existing development or settlement land uses which are free from environmental or planning constraints and which are within the Rib valley landscape cell that contains existing settlement. The Appeal Site is the least constrained area of opportunity for development within that landscape cell. I consider that sensitively designed new built form within the Rib valley landscape cell, which already contains Buntingford, is an appropriate approach to avoid far-reaching impacts on the wider rural landscape, which is situated away from existing settlements, and upon landscape character.

5.11.3 As previously described in Sections 5.3 and 5.4, the LVIA and LVIA Addendum considered the effects of the Proposed Development upon landscape character.

5.11.4 As I have previously described in Section 5.3, the evaluation section of the East Herts Council Landscape Character Assessment SPD (CD 9.1) identifies LCA 141 as Poor condition and Moderate strength of character, resulting in the strategy and guidelines for managing change to be Improve and Restore. The impact of built development on LCA 141 is noted in the evaluation section of the East Herts Council Landscape Character Assessment SPD (CD 9.1) as being 'moderate', and the impact of land-use change noted as 'low', as shown in Figure 3.3 of this proof. Page 221 of CD 9.1 sets out the strategy and guidelines for managing change and, as I have previously identified, in my opinion the Proposed Development would contribute to these through creation of new woodland, hedgerows, and ponds; as well as contribute to the Hertfordshire Green Infrastructure Strategy Priorities for Theme 1: A Resilient Landscape – 1A Expand tree coverage and enhance woodland connectivity; Theme 3: Nature Recovery – 3B incorporate biodiversity into existing and future new developments in accordance with BNG



requirements; and Theme 4: Access and Connectivity – 4A Reconnect and create multifunctional links. The Proposed Development would deliver substantial green blue infrastructure, which is multifunctional and would provide open space and recreation to the wider community of Buntingford.

5.11.5 I therefore consider that in landscape and visual terms the Proposed Development accords with the requirements of NPPF policy N2 (1a).

5.12 NPPF 2026 Policy N2 (1d)

5.12.1 Policy N2 (1d) requires existing natural features, such as trees and hedgerows, to be conserved and enhanced where possible, and identifies that landscaping is required to help create a well-designed place and for the integration of development into its surroundings.

5.12.2 Existing trees and hedgerows are proposed to be retained in the Proposed Development where practicable, including key landscape features as shown on the Land Use Components Plan (CD 2.5). The Landscape Strategy Plan (Figure NJ6 of this proof and CD 2.11.iv) illustrates landscape planting principles for the Proposed Development, including retained existing vegetation, proposed replacement planting, structure planting, and substantial areas of tree planting and new hedgerow planting. The visualisations in Appendix C of the LVIA Addendum (CD 2.11.vi and Appendix A, Figure NJ5 of this proof) demonstrate that in the long term, planting will aid the integration of development into its surroundings. Noting that this is an outline application, planting details would be provided at reserved matters and/or through planning conditions.

5.12.3 I therefore consider that, in landscape and visual terms, the Proposed Development accords with the requirements of NPPF policy N2 (1d).



6 Summary and Conclusion

6.1 Summary and Conclusion

- 6.1.1 The landscape RfR asserts that the Proposed Development would intrude on and have a significantly harmful urbanising impact on LCA 141 Cherry Green Arable Plateau and would fail to preserve the Rib Valley setting of the Buntingford Community Area. Additionally, the landscape RfR considers that the Proposed Development would be a substantial urban extension outside of and adjacent to Buntingford, encroaching into the rural area beyond the Green Belt and causing significant harm to the rural landscape character.
- 6.1.2 I have set out the Appeal Site context and an appraisal of the Appeal Site, followed by a summary of the landscape assessment methodology of the LVIA (CD 1.15.i) and discussion of the findings of the LVIA (CD 1.15.i) and LVIA Addendum (CD 2.11.i) for the landscape receptors of LCA 141 Cherry Green Arable Plateau and the landscape character of the site and immediate surroundings. I have also set out the landscape policy context.
- 6.1.3 I have provided a chronological summary review of historic maps (Appendix B), tracing Buntingford's growth from an original ribbon settlement along Ermine Street (an ancient Roman road) to a clustered settlement pattern, and I have considered the addition of the A10. My key points include:
- Early maps show small fields behind settlement and ribbon development along the river and main road.
 - Post-war and late 20th Century housing expanded the town to the west, east, and south, altering the settlement pattern to a cluster form. The Proposed Development would be a continuation of the growth of that cluster settlement pattern.
 - The role of the A10 road opened in 1987 was for the purpose of diverting traffic out of the congested town centre, rather than acting as a boundary for development.



- I have shown that the alignment of the A10 does not respond to landform or historic landscape pattern, and that its purpose as a development-limiting boundary is a false construct.

6.1.4 I have analysed the relationship between the Appeal Site and Proposed Development and the published LCAs, focusing on LCA 141 Cherry Green Arable Plateau which the Appeal Site is within. My key points are:

- LCA 141 is described as a large-scale, elevated plateau landscape, which is not rare or highly distinctive within the county.
- The part of LCA 141 which is near to the A507 and A10, and within which the Appeal Site is located, is noted to have less of a quiet and remote feel due to the existing urban influences.
- The proposed built form would be concentrated in the central and eastern parts of the Appeal Site, with the western part proposed as country park open space.
- There is a greater extent of LCA 141 area which would not be subject to the theoretical visibility of the development, than the portion of LCA 141 which would have theoretical visibility.
- The urbanising effect of the Proposed Development upon LCA 141 would be limited and would not fundamentally alter or redefine the key characteristics of LCA 141 or affect the integrity of the distinctive features of LCA 141.

6.1.5 I have set out the reasonings for the findings of the assessment of landscape effects upon LCA 141 and the landscape character of the site and its immediate surroundings and noted the consideration of negative and positive effects that would arise.

6.1.6 I have discussed the Rib valley landscape cell, which is defined by a series of landform spurs that wrap around and contain the valley floor of the River Rib, the associated valley slopes and the settlement of Buntingford. My key points are:



- The Appeal Site is situated within the Rib valley landscape cell, and the Proposed Development would be contained within it, avoiding far-reaching impacts on the wider rural landscape and landscape character.
- The Buntingford Community Area Neighbourhood Plan (BCANP) (CD 5.2) emphasises the importance of maintaining the town's valley setting and limiting development on higher ground, with Appendix 1 of the BCANP (CD 5.2) noting that new housing development should be within the valley setting. I consider that the Proposed Development would be within the valley setting as it is within the Rib valley landscape cell.
- Visualisations at Figure NJ5, Appendix A (also Appendix C, LVIA Addendum – CD 2.11.vi) demonstrate that mitigation planting would soften the appearance of new housing, helping to integrate it into the landscape over time. Additionally, the mitigation planting would soften the appearance of existing housing at the north of Buntingford which is currently visible from the visualisation view locations.

6.1.7 I have described the areas in the Rib valley cell which are determined to have the fewest mapped environmental and planning constraints, and identified that the least constrained area and thus the greatest opportunity is the valley slopes below the western and northern spurs of landform, including the Appeal Site in LCA 141. Other areas with the least constraints are situated within LCA 142 High Rib Valley and LCA 143 Wyddial Plateau; both of which are identified in the East Herts Council Landscape Character Assessment SPD (CD 9.1) as being of Moderate condition, whereas LCA 141 is identified as being of Poor condition.

6.1.8 I have set out my considerations as to why, in my opinion, the Proposed Development would meet the requirements of planning policy DES2 Landscape Character, of the East Hertfordshire District Plan 2011 – 2033 (CD 5.1) and planning policies E1 and HD2 of the BCANP (CD 5.2).

6.1.9 I have also considered NPPF Paragraph 187(b) (CD 5.16) and the NPPF 2026 policy N2 (1a) requirements and set out why I consider that the Appeal Site does not warrant a degree of protection at a high level. The Appeal Site does not lie within a Protected Landscape designation or local landscape designation, nor within any environmental designations.



6.1.10 I have considered NPPF 2026 policy S5 (1j) criteria (i) and set out the reasons, in my opinion and in landscape and visual terms, why the Proposed Development would be physically well-related to the settlement of Buntingford. I have also considered NPPF 2026 policy N2 (1a) and policy N2 (1d) and set out why I consider that the Proposed Development would be in accordance with the requirements of those policies.

6.1.11 In conclusion, it is my opinion that Proposed Development would be a settlement extension which is in keeping with the cluster pattern of settlement of Buntingford that has evolved. From a townscape perspective, the A10 would be perceived as a 40mph road within the extended settlement area which is crossed at appropriate points for community integration. New built form of the Proposed Development would be situated adjacent to the existing urban area that is within a small part of the northeastern area of LCA 141 and located where there is existing urban influence upon LCA 141 from Buntingford, the A507 and A10 road corridors. LCA 141 is described as a large-scale character area that is not rare or distinctive. Therefore, I consider the Proposed Development's urbanising effect on LCA 141 to be limited, and which would not alter the key characteristics of the character area.

6.1.12 The Proposed Development would be contained within the Rib valley landscape cell which includes the valley floor of the River Rib, the associated valley slopes and the settlement of Buntingford. Environmental and planning constraints have been mapped, which show that the Appeal Site is among the least constrained areas for development within the Rib valley landscape cell. The mapping also shows that there are limited alternative areas for development that are without environmental or planning constraints. Additionally, of the LCAs which surround and abut Buntingford, LCA141 is identified as being fairly frequent in the county with no major distinctiveness, of a Poor condition and Moderate strength; whereas the other LCAs which abut Buntingford are of a Moderate condition and Moderate strength. I consider that sensitively designed new built form within the Rib valley landscape cell is an appropriate approach to avoid far reaching impacts on the wider rural landscape and landscape character. I also consider that mitigation planting would soften the appearance of new housing, helping to integrate it into the landscape over time. In my opinion, the Proposed Development would be physically well-related to the existing settlement of Buntingford.





Appendices



Appendix A Figures

Figure NJ1:	Landform and Settlement Analysis
Figure NJ2:	LVIA Figure L3 Landscape Character Plan (Corrected)
Figure NJ3:	LVIA Addendum Figure L4A Zone of Theoretical Visibility
Figure NJ4:	Environmental and Planning Constraints Mapping (DLA plan)
Figure NJ5:	LVIA Addendum Visualisations
Figure NJ6:	Landscape Mitigation Strategy Plan



Appendix B Historic Maps



Appendix C LCA 141 Cherry Green Arable Plateau

