Place Services
Essex County Council
County Hall, Chelmsford
Essex, CM1 1QH
T: 0333 013 6840
www.placeservices.co.uk
@PlaceServices

East Herts District Council
Wallfields
Pegs Lane
Hertford
SG13 8EQ

14/10/2024

For the attention of: David Lamb

Ref: 3/24/1255/OUT – Land South Of A507, West Of A10 Buntingford

Thank you for consulting us on the Outline planning application for development of employment land (flexible use B2, B8, E(c) and E(g)), informal open space, associated works and infrastructure including a new access from A507, with all matters reserved except for access.

This letter sets out our consultation response on the landscape impact of the application and how the proposal relates and responds to the landscape setting and context of the site.

Summary

Not supportive on landscape grounds	
Supportive subject to attached recommendations and / or conditions	X
Further information required prior to determination	
No landscape comments / does not wish to comment	

Overall, we do not disagree with the judgements made within the submitted LVIA, and where our judgements may differ these are not deemed substantial. Details of recommendations, submission documents and recommended conditions have also been included.

Site Context

The application site is located to the west of Buntingford although is separated from the settlement by the A10 road. The A507 road runs along the northern boundary and defines the edge of the site. Buntingford Business Park is located to the north of the Site on the opposite side of the A507.

The site itself comprises one arable field, surrounded by hedgerows on all boundaries. The eastern boundary to the east is however partially open to the A10. The site topography is raised to the south as it meets the Priority Habitat Deciduous Woodland 'The Thicket'.

Planning Context

East Herts District Plan (20118

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

- The site is located within Policy GBR2 – Rural Area Beyond the Green Belt, and states that "*In order to maintain the Rural Area Beyond the Green Belt as a valued countryside resource, the following types of development will be permitted, provided that they are compatible with the character and appearance of the rural area".*

- Policy DES2 'Landscape Character' states:
  i. *"Development proposals must demonstrate how they conserve, enhance or strengthen the character and distinctive features of the district's landscape. For major applications, or applications where there is a potential adverse impact on landscape character, a Landscape and Visual Impact Assessment and/or Landscape Sensitivity and Capacity Assessment should be provided to ensure that impacts, mitigation and enhancement opportunities are appropriately addressed.*
  ii. *Appropriate mitigation measures will be taken into account when considering the effect of development on landscape character/landscaping.*
  iii. *Where relevant, development proposals will have regard to the District Council's currently adopted Landscape Character Assessment Supplementary Planning Document."*

- Policy DES3 'Landscaping' states:
  i. *Development proposals must demonstrate how they will retain, protect and enhance existing landscape features which are of amenity and/or biodiversity value, in order to ensure that there is no net loss of such features.*
  ii. *Where losses are unavoidable and justified by other material considerations, compensatory planting or habitat creation will be sought either within or outside the development site. Replacement planting schemes should comprise mature, native species appropriate to the local conditions and landscape character, supported by a monitoring and replacement programme.*

- Policy DES4 Design of Development, DES5 Crime and Security and NE4 Green Infrastructure should also be considered.

Buntingford Community Area Neighbourhood Plan (BCANP)

- Policy BE2 states that "*Other smaller employment sites will be permitted where they do not conflict with other policies in this Plan and provided that all the following criteria are met so that proposals:*
  1) *Do not involve the loss of dwellings*
  2) *Contribute to the character and vitality of the local area*
  3) *Are well integrated into and complement existing clusters of activity*
  4) *Protect residential amenity*
  5) *Do not adversely impact upon road safety*
  6) *Enhance the development and provision of employment and self-employment*
  7) *Do not adversely affect the attractiveness of the local countryside"*

- 'View East from Point H (Throcking turn off A507)' states that *"Buntingford has largely remained hidden from view when approaching from the west, as this shot taken from close to the A507 clearly shows. Nowadays, apart from the mobile 'phone communication tower, the only significant object seen is the roofing of the buildings at Buntingford Business Park. With expansion of the Business Park being proposed for the future, every effort should be made to ensure that building heights are restricted to a level that will maintain this view."*

- The site is also located within an Area of Archaeological Significance.

Review of Submitted Information

Landscape and Visual Impact Assessment (LVIA)

An LVIA has been submitted and undertaken by Stantec. The report is conducted in accordance with the 'Guidelines for Landscape and Visual Impact Assessment' Third Edition (GLVIA3) and references Landscape Institute TGN 02/21 'Assessing the Value of Landscapes Outside National Designations' and the Landscape Institute TGN 06/19 'Visual Representation of Development Proposals'.

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

Landscape Character

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

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

The Visual Impact states that; *"The major visual impact on the area comes from the perimeter of Buntingford with significant impact arising from both industrial and residential developments on the upper slopes of the Rib Valley."*

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

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

The submitted assessment (Appendix C) judges that there would be **moderate adverse** effects on the site and surrounding context at Year 1. We also agree with this judgement.

We therefore do not disagree with the judgements made within the LVIA regarding landscape character impacts.

Visual Impact

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

- A10: Short distance views are available into the site from the immediate site boundary to the east. A break in the hedgerow on the east boundary provides open views into the site from the A10 and the Woolpack Veterinary Surgery. The experience of users on the A10 entering Buntingford will be changed if development occurs on the western side of the road, and therefore this close-range view should be considered.

- Buntingford Business Park entrance: Views are obtained through the existing field entrance opposite the Buntingford Business Park entrance on Baldock Road. We consider this close-range view to be an important viewpoint which should have been considered.

- Baldock Road: Some open views are obtained above the hedgerow from Baldock Road, where taller vegetation and trees are absent. Close-range views are obtained from Baldock Road towards the north-west corner.

The submitted LVIA also groups sets of visual receptors and therefore provides a judgement on a collection of viewpoint receptors. Whilst we judge that there would be more variation between the assessed magnitude of change between receptors than is afforded that within the submitted LVIA, we judge that the assessment considers the worst-case scenario and judges the worst affected visual receptor within the receptor group.

Generally, we do not disagree with the judgements made within the assessment of visual receptors. Where our judgements may differ, these are not deemed substantial.

As has been recognised within the submitted LVIA, moderate adverse effects are anticipated from receptors to the west (i.e. VP2, 3, 10, 16). At present, the built development within Buntingford is largely screened through vegetation and the natural undulating landform. However, the introduction of employment development provides an incursion onto the countryside which alters the experience of users to the west on their approach to Buntingford. It is therefore imperative that the design of scheme is based around reducing the impact of built development within the countryside, notably from the west.

Review of the submitted Masterplan

- The Area 141 LCA states that "*The major visual impact on the area comes from the perimeter of Buntingford with significant impact arising from both industrial and residential developments on the upper slopes of the Rib Valley*." Owed to the location of the development site on the edge of Buntingford, and on the upper slopes of the River Rib, this site is at risk of being visually intrusive on the landscape if not designed sensitively.

- The submitted Opportunities and Constraints Plan concentrates the tallest built development to the east on lower ground, and closer to the existing urban edge of Buntingford. The proposed open space is located on the western edge which is most suitable, considering its elevated position and distance from the urban edge.

- The 'Strategy for Guidelines for Managing Change: Improve and Restore' of the Area 141 LCA states, to "*promote the creation of new small to medium scale native broadleaved woods*

throughout the area to reduce the scale of the open arable areas, using ancient hedge and field boundaries to locate the most appropriate location for wood restoration and expansion". The submitted Illustrative Masterplan (Rev. F) demonstrates an open space with tree planting and pathways, with a woodland belt running along the north-south ridgeline. This woodland planting provides visual screening to the proposed built form. We advise this area of strategic landscaping is planted in advance of the adjacent area of built development.

- At present, no information has been submitted regarding the anticipated heights of the proposed employment development buildings. We therefore cannot ascertain whether the proposed woodland belt planting will successfully screen the proposed buildings. Further details of elevations will therefore be required.

- Tree and hedgerow removal is limited to the northern site boundary, adjacent to the A507 road. These removals are proposed to facilitate the new entrance and visibility splays to enter the application site. Whist we do not oppose to these removals, mitigation planting should be proposed within the scheme to reduce the visual effects from the A507 which is one of the more sensitive receptors.

- Small woodlands are a characteristic of the surrounding LCAs. Within Area 141, proposals should *"promote the creation of new small to medium scale native broadleaved woods throughout the area to reduce the scale of the open arable areas, using ancient hedge and field boundaries to locate the most appropriate location for wood restoration and expansion"*. This will also contribute to reducing the visual effects of the scheme, which will currently be very visible in the surrounding landscape.

- A strong GI strategy is essential for limiting the visual effects of introducing urban development onto a rural landscape which is currently largely undeveloped. Highly sensitive visual receptors are identified within the LVIA and from the west and therefore the establishment of a good GI network is important to help reducing the visual impact from this edge.

- Height and scale of the proposed buildings should be a strong consideration owed to the undulating and elevated landform.

- The large areas of car parking should be broken up by soft landscaping. We advise that trees, shrubs and SuDS are proposed within the car parks between parking spaces.

- Permeable surfaces should also be proposed across the scheme.

- The SuDS basin is appropriately located on the eastern edge of the site, on the lower elevation ground and also to reduce the visual impact of development for users of the A10 as they enter Buntingford. We agree with this location and advise that the ground contouring, planting and inlet and outlet design to be carefully considered to maximise biodiversity and amenity value. A standard approach of precast concrete and galvanised handrail for inlets/outlets should be avoided and a range of vegetation types such as wildflowers and other nectar rich plants, grasses of various heights, drought tolerant species as well as marginal aquatics and wet grassland should be used.

- A predominance of one species or variety should be avoided in order to minimise the risk of widespread biotic threats to the urban forest and to increase species diversity. Preference should be given to native trees and shrubs, though the use of naturalised trees and shrubs,

which are not necessarily native but are the correct tree for site conditions and would add landscape and arboricultural value could be used where appropriate and justified.

- Retention of mature hedge lines, tree belts, hedgerow-trees, and standalone trees on the site boundaries is required. Removal should only be proposed where necessary and justified to facilitate access. We would expect opportunities to be taken to enhance / strengthen all boundaries as 'eco-tone'. There is also an opportunity for a larger proportion of the south-eastern boundaries to be retained as woodland creation and / or woodland belt and green buffer to form a stronger edge to the residential care properties.

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

Submission Documents

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

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

Recommended Conditions

If the application is minded for approval, we recommend the following conditions:

4P12 LANDSCAPE DESIGN PROPOSALS
Prior to the commencement of the development, full details of both hard and soft landscape proposals shall be submitted to and approved in writing by the Local Planning Authority.

These details shall include, as appropriate: (a) Proposed finished levels or contours (b) Means of enclosure (c) Car parking layouts (d) Other vehicle and pedestrian access and circulation areas (e) Hard surfacing materials (f) Minor artefacts and structures (e.g. furniture, play equipment, refuse or other storage units, signs, lighting) (g) Proposed and existing functional services above and below ground (e.g. drainage, power, communications cables, pipelines, etc. indicating lines, manholes, supports, etc.) (h) Retained historic landscape features and proposals for restoration, where relevant (i) Planting plans (j) Written specifications (including cultivation and other operations associated with plant and grass establishment) (k) Schedules of plants, noting species, planting sizes and proposed numbers/densities where appropriate (l) Implementation timetables. Thereafter the development shall proceed in accordance with the approved details.

Reason: To ensure the provision of amenity afforded by appropriate landscape design, in accordance with policies DES2, DES3 and NE4 of the East Herts District Local Plan 2018.

4P13 LANDSCAPE WORKS IMPLEMENTATION

All hard and soft landscape works shall be carried out in accordance with the approved details. Any trees or plants that, within a period of five years after planting, are removed, die or become, in the opinion of the Local Planning Authority, seriously damaged or defective, shall be replaced as soon as is reasonably practicable with others of species, size and number as originally approved, unless the Local Planning Authority gives its written consent to any variation.

Reason: To ensure the provision, establishment and maintenance of a reasonable standard of landscaping in accordance with the approved designs, in accordance with policies DES2, DES3 and NE4 of the East Herts District Local Plan 2018.

4P17 LANDSCAPE MAINTENANCE

A schedule of landscape maintenance for a minimum period of five years shall be submitted to and approved by the Local Planning Authority and shall include details of the arrangements for its implementation.

Reason: To ensure the provision of amenity afforded by the proper maintenance of existing and/or new landscape features, in accordance with policies DES2, DES3 and NE4 of the East Herts District Local Plan 2018.

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

Yours sincerely,

Megan Cowell BA (Hons) MA
Landscape Consultant

Place Services provide landscape advice on behalf of East Herts District Council
Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.