

PLANNING APPLICATION 18/00747/OP

LAND OFF BRIARY LANE, ROYSTON

LANDSCAPE COMMENTS, INCLUDING REVIEW OF THE LANDSCAPE AND VISUAL APPRAISAL SUBMITTED WITH THE APPLICATION

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1. INTRODUCTION

- 1.1 This review of the landscape and visual aspects of the planning application for residential development on land to the east of Briary Lane, Royston (North Herts District Council (NHDC) reference 18/00747/OP) has been undertaken by Jon Etchells Consulting (JEC), a Cambridgeshire based landscape practice with extensive experience of landscape design and assessment. The review was commissioned by a local campaign group, 'Royston Says No to Gladman', set up to oppose the proposed development.
- 1.2 Jon Etchells has carried out this review, and has over 30 years experience of landscape assessment and design. He has undertaken landscape, townscape and visual assessments for housing projects in Surrey, Hampshire, Oxfordshire, Kent and Herefordshire, as well as assessments for a variety of major infrastructure projects, including waste installations, new industrial buildings, several motorway service areas, schools and a new road in Bedfordshire (a Nationally Significant Infrastructure Project under the Planning Act 2008). He has also provided landscape evidence on behalf of Wycombe District Council, North West Leicestershire District Council, East Hampshire District Council, Medway Council and South Lakeland District Council at Public Inquiries regarding housing developments at a variety of scales, including with the Chilterns AONB and adjacent to the Kent Downs AONB and Lake District National Park, and has acted for developers in respect of appeals for a range of developments including large scale employment uses and a range of residential development.
- 1.3 The planning application was accompanied by a Landscape and Visual Appraisal (LVA), prepared by FPCR on behalf of Gladman Developments, and this review considers the approach, content and conclusions of that LVA.
- 1.4 A full Landscape and Visual Impact Assessment of the proposals has not been undertaken as part of this review - the comments set out below are based on a review of the LVA provided by the applicants, and on site observation, and are an indication only of the likely levels of landscape and visual effects. However, sufficient on-site assessment has been undertaken to be able to come to an informed view as to the appropriateness of the conclusions reached by the LVA on the likely significance of the landscape and visual effects.

2. THE PROPOSED DEVELOPMENT

- 2.1 The outline planning application is for up to 120 new houses on a 9.1ha site (of which around 4.1ha would be new residential development) to the east of Briary Lane and south of Echo Hill, on the southern edge of Royston. The site is outside the defined development limits to Royston as shown on the Local Plan Proposals Map, and is in the countryside and in active agricultural use.
- 2.2 The site comprises two rectangular arable fields, a smaller one to the west and a larger field to the east. There is a marked variation in topography within the site - the western field rises from around 95m AOD at its northern end to 119m to the south, and the eastern field rises from around 97m AOD in its north western corner to 120m AOD in the south west. A local ridge line runs across the larger field from south west to north east, and the eastern side of this field is lower, with levels around 104m AOD in its north eastern corner and 103m in the south east. The Development Framework Plan shows that the areas proposed for new housing avoid the highest parts of that ridge, but also shows that new houses would be constructed as high as the line of the 110m contour line, running roughly to the south through the eastern field, and where that contour line crosses the ridge they would be on its highest part. The remainder of the new houses in that field would be at lower levels, but it is

important to note two relevant points: firstly that is the floor level of the new houses - if they are to be two storeys high then they would be around 9m in height, leading to ridge heights of up to 119m AOD, and secondly development at around 110m AOD would be at significantly higher levels than any other residential areas within Royston to the west of the A10.

- 2.3 The proposed development involves access from Briary Lane to the north of the site - at present this is a narrow, unsurfaced track, and is also a bridleway (see Photographs 1 and 2 at the end of this review). The proposals involve the widening of the lane to 5.5m and its surfacing, together with an additional 1.8m for a footway along its eastern side. The total surfaced width would therefore be 7.3m, with associated kerbs and drainage, and the proposals also involve the removal of the existing stone wall along the western side of the lane and its replacement with a new retaining wall. A separate review of the likely effects of the development in terms of trees ('Independent Arboricultural assessment of an outline planning application for 120 dwellings', by Sharon Hosegood Associates) has concluded that there would be likely to be significant losses of the existing trees alongside the bridleway, further affecting its existing character.
- 2.4 The site and surrounding area are described to a reasonable level of detail within the submitted Landscape and Visual Appraisal (LVA), and that description is not repeated here.

Pre-Application Advice

- 2.5 The planning application followed pre-application advice provided by NHDC in a letter dated 19 December 2016. That advice was detailed and clear, and concluded that, even if NHDC were to be unable to demonstrate a 5 year supply of housing land, the adverse effects of the proposals on the rural character of the area would be likely to significantly and demonstrably outweigh the benefits of the provision of new housing. The advice also noted the likely difficulty of achieving suitable access, the topography of the site and the impact on the rural landscape. The advice stated that, in the event of NHDC being able to demonstrate a five year supply of housing land, '*Determination on this basis would in my view likely dictate a straightforward refusal of planning permission on the grounds that such development would be clearly and manifestly contrary to policy.*'

3. REVIEW OF THE SUBMITTED LANDSCAPE AND VISUAL APPRAISAL

- 3.1 The application was accompanied by an LVA, which is generally reasonable in terms of its scope, methodology (which is based, as is standard practice, on the 'Guidelines for Landscape and Visual Impact Assessment' ('the GLVIA'), produced jointly by the Institute of Environmental Management and Assessment and the Landscape Institute) and coverage (though noting the comments below), but in general underplays the landscape and visual effects which would result from the development. The following should be noted in particular:
- The check boxes on the flysheet at the front of the document indicate that it was originally written in May and June 2016, and then reviewed and approved for issue in March 2018. However, some sections appear not to have been updated since 2016, for example the sections on the Local Plan in 3.14 and 3.15.
 - Section 3 of the LVA summarises the planning context, and cites relevant planning policies, though it omits Adopted Local Plan Policy 6, Rural Areas Beyond the Green Belt, with which there would be a clear conflict. However, while the LVA notes the content of other relevant policies, it does not address the conflict with many of them - that may be more of a planning consideration than a matter for the LVA, but there

would seem little point in citing the policies if the question of agreement or conflict with them is not considered.

- In sections 4.39 to 4.53 the LVA considers whether the '*site and its immediate context*' comprise a valued landscape in the meaning of Paragraph 109 of the NPPF. This is done by considering various aspects of the local landscape in terms of the properties set out in Box 5.1 of the GLVIA (though the GLVIA states that this is not the only way to determine value). However, the analysis is skewed towards the site itself, despite the introductory section stating that it is the site and surrounding area which are under consideration. This analysis therefore tends to play down the landscape value of the site and surrounding area, and a more balanced analysis, including the adjoining presence of Therfield Heath (with its high level of nature conservation interest) and the local network of Public Rights of Way around the site (including two long distance routes) and the attractive, rolling chalk landscape would be that the site does form part of a valued landscape within the meaning of Paragraph 109 of the NPPF. In this context it is relevant to note that the NHDC landscape character assessment (see below) finds the area including the site to be of high landscape value.

- The LVA describes and considers potential effects on a series of viewpoints, which are shown on its Figure 6. However, those viewpoints are not fully representative of areas which would have views of the development. A check on site has shown that there are other areas with views to the site:
 - From the north east there is a distant view from the western side of the A10, just to the north of New Farm (as the road passes over a local high point 500m to the north of the A505 roundabout) - see Photograph 3. The site can be seen in this view, and the new houses would be visible above the remainder of the urban area. The impact on that view would not be great, as the site is around 2.6km from the viewpoint, but what this illustrates is that new houses on the site would be visible in a wide area to the north of the town (see Photographs 5 and 8 for a reverse view showing the broad area with views back to the site). It is part of the character of Royston that it is enclosed by wooded hills to its south, and the development would breach that enclosure.

 - From closer to the site, there are views from the Hertfordshire Way across Therfield Heath, to the south west of viewpoint 2 in the LVA - see Photographs 4 and 6. These are important viewpoints, on a long distance footpath within Therfield Heath, and are underplayed by the LVA - the view changes along the route, and the LVA only includes one view. Nevertheless, the assessment in the LVA in Appendix C (labelled as such within the Appendix, but shown in the contents list as Appendix B) is of moderate adverse effects on completion - the definition of moderate adverse effects in section 2.23 of the LVA is an effect that '*will markedly change the existing views*'.

- The LVA does not give sufficient consideration to the direct effects of the access proposals and the need to widen a significant length of Briary Lane - those aspects of the proposals are not mentioned in Section 5.0 of the LVIA, which describes the development. The widening and surfacing of the existing narrow, unsurfaced lane, together with the removal of the existing stone wall along its western side and (as indicated in the arboricultural assessment) some of the trees and other vegetation alongside it would completely change its character from that of a rural track into a suburban residential access road - that is an important landscape effect in its own right, and the LVA ignores it.

- There is an error in section 6.4 of the LVA, which states that effects during construction would be '*minor-moderate adverse*' - the summary table in Appendix A says that effects would be '*major/ moderate adverse*' (and the Table is presumably correct, as construction stage effects are typically greater than those at completion).
- Sections 6.10 to 6.13 of the LVA appear to attempt to justify the development in terms of its compliance with some of the guidelines set out in the NHDC landscape character assessment (see below), in that development would be on lower ground within the site, would avoid development on the skyline, and would include new planting. While the proposed development would avoid the higher parts of the site, it would represent by some distance the highest area of built development within the south western part of the town, and in some views (see Photographs 4, 6 and 7) the new houses would appear on the skyline. In addition, the references within the guidelines for the local landscape character area to the desirability of new planting refer to planting in its own right - planting in association with a large scale residential development cannot reasonably be claimed as a net benefit.
- Section 6.15 of the LVA states that effects on the local landscape would be moderate adverse on completion. For the reasons set out above (and also below) that seems to be an underestimate, but taking that assessment at face value for the time being, the definition shown in section 2.23 is that a moderate adverse effect is one which '*will markedly change the existing landscape*' - that effect would be within a local landscape which the NHDC landscape character assessment regards as of high sensitivity and value.
- Figure 7 of the LVA shows what can be seen from viewpoints 1 and 2, and there appear to be some errors within the labelling for those views. In viewpoint 1, the label '*Eastern boundary hedge*' is in fact pointing to the hedge within the site, and the land beyond it is also within the site, and the part of the eastern field visible in this view would have houses built on it, some of which in this view would be on the skyline. In viewpoint 2, the label '*Western boundary hedge*' is again in fact pointing to the hedge within the site (if that were the western boundary hedge then the hedge within the site would be visible just beyond it), and there would be houses to each side of that hedge in this view, some of which would be on (or very close to) the skyline.

4. LANDSCAPE AND VISUAL EFFECTS

4.1 The following characteristics of the site and surrounding area and also the proposals are important in considering the landscape and visual effects which would result from the proposed development:

1. The site is in itself an attractive piece of landscape, with its rolling chalk topography, mature trees to the east and expansive views to the north. It adjoins the existing urban edge to its north, but that edge is not harsh or discordant, and the houses along Echo Hill are set down within a local dip, at a lower level than the site. The lower density houses to the east of the site are generally well screened.
2. Development on the site would extend large scale built development out into a presently attractive landscape, at a significantly higher elevation than any other such areas in this part of the town.

3. The NHDC landscape character assessment (the North Hertfordshire and Stevenage Landscape Character Assessment), as included within Appendix D of the LVA, shows the site as within the 'Scarp Slopes South of Royston' character area. This area is noted for its long distance views to the north, and also for its rarity and distinctiveness - under the heading of 'Visual and Sensory Perception' the assessment states that it is '*almost unique in the county*'. Under the heading of 'Landscape Character Sensitivities', the assessment includes the following:
 - '*The marked topography is emphasised by the predominantly open character of much of the area. The area would be very sensitive to change or degradation.*'
 - '*The character area would be vulnerable to the loss of the open character of the area.*'
 - '*The character area overall is very much intact, with a good representation of typical character. The area is in a good state of repair.*'
 - '*Good public access through numerous rights of way, including the Icknield Way and the Hertfordshire Way.*'
 - The character area is stated to be of high sensitivity and high landscape value.
 - Under the heading of 'Visual Sensitivities' the assessment states:

'Views to and from the scarp slopes including undeveloped and wooded skylines are relatively open and would be highly sensitive to the introduction of urbanizing features.'
 - Under the heading of 'Landscape Value' the assessment states:

'Aspects of particular value within Scarp Slopes South of Royston are the recognisable sense of place, the striking landform, the visual interest, memorable uninterrupted views, the sense of openness and visible expressions of the local geology.'
 - The capacity to accommodate large (over 5ha) or smaller (less than 5ha) urban extensions is stated to be low, and it should also be noted that even for the lowest category of development ('*Incremental small scale development*') the assessment states that there would be '*very limited capacity*' and that '*due to the existing open and undeveloped character any proposals would need clear justification to avoid the erosion of the rural character*'.
 - The Landscape Management Guidelines include '*Maintain the general open character of the area*', and the Built Development Guidelines include '*Avoid the location of new development in isolated and visual[ly] intrusive locations, particularly where they would be visible on the skyline.*'
4. The proposed development would be open to view, from the adjacent Public Rights of Way, from other routes across Therfield Heath and (at a greater distance) from a broad swathe of lower lying land to the north, as well as from the existing houses which adjoin it.
5. The development would involve significant changes to the character of Briary Lane, which is at the moment a quiet, unsurfaced rural track, but which would become a suburban residential access road.

4.2 Bearing in mind the above, and noting again that a full Landscape and Visual Impact Assessment of the proposals has not been undertaken as part of this review, it is apparent

that there would be some significant adverse effects on local landscape character, and also on views from nearby houses and Public Rights of Way.

- 4.3 It seems likely that the assessment has underestimated effects on the local landscape by perhaps half a category, i.e. effects should be moderate to major adverse on completion, declining over time to moderate adverse.

5. CONCLUSIONS

- 5.1 The submitted LVIA has understated the adverse effects of the proposed development in landscape and visual terms, as a result of its failure to consider adverse effects on the character of Briary Lane, its less than comprehensive consideration of viewpoints and views and its underestimation of the landscape value and sensitivity of the site.

- 5.2 The proposed development would have significant adverse effects at a variety of scales:

- The site itself is an attractive area of chalk downland landscape, and forms part of a wider landscape extending to Therfield Heath, which is a valued landscape within the meaning of Paragraph 109 of the NPPF. The landscape of the site would be fundamentally altered by the development.
- In the area immediately around the site there are a number of Public Rights of Way, including two long distance routes - there would be adverse effects for users of those routes, and on the local landscape around the site.
- Further afield, there would be adverse effects on views and the character of the landscape to the north of Royston, and on the character and setting of the town itself, as a result of the presence of the development in views to the south - the development would breach and weaken the present sense of enclosure of the town by higher, wooded ground, largely free from built development.

- 5.3 In terms of policy, the proposals would therefore be contrary to the general landscape protection policies of the NPPF (including Paragraph 109), Policies 6 and 9 of the adopted Local Plan and a number of landscape-related policies in the emerging Local Plan.

- 5.4 It is beyond the scope of this review to make a judgement as to the overall planning balance, but it can be said with some confidence that the adverse landscape and visual effects of the development would be significant and demonstrable.

PHOTOGRAPHS

All photographs were taken on 26 June 2018, using a digital camera with a lens approximating to 50mm.



1. View south along Briary Lane, to the north of the site - the lane would be widened to 5.5m and surfaced, with a 1.8m wide footway along its eastern side.



2. View north along Briary Lane, just to the north of the site - the wall on the left of the view would be removed and replaced with a new retaining wall.



3. View south west towards the site from the A10, just to the north of New Farm and the A505 roundabout. The site is visible where indicated by the red arrow.



4. View south east to the site from the Hertfordshire Way across Therfield Heath - houses to the north of the site along Echo Hill can be seen on the left of the view, and the site extends to their right across the view and uphill. The new houses would extend across the field with the red poppies, between the existing houses and the large tree.



5. View to the north from the Hertfordshire Way across Therfield Heath, showing the broad area to the north of Royston with views back to the wooded slopes above the town.



6. View south east to the site from further to the north east on the Hertfordshire Way across Therfield Heath - the site extends across the view between the trees on the left and right, and the new houses would extend across the field with the red poppies.



7. View south east across the site from its north western corner. The smaller, western field within the site is in the foreground and the larger, eastern field is beyond the hedge running across the view. The new houses within that field would be on the skyline in this view.



8. View north east across the site from the field gate in the south western corner of the large field. The roofs of the houses at a lower level than the site within Echo Hill can be seen just to the left of centre in the view, and the new houses on the site would extend up the hill away from them, but would avoid the higher ground closer to this viewpoint. Note also the lower ground in the distance to the north, from which there are some views back to the site.