

PLANNING APPLICATION 20/00744/OP

LAND OFF ECHO HILL, ROYSTON

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

By Jon Etchells Consulting

May 2020



1. INTRODUCTION

1.1 This review of the landscape and visual aspects of the planning application for residential development on land to the south of Echo Hill, Royston (North Herts District Council (NHDC) reference 20/00744/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' (RSNTG), set up to oppose the proposed development.

1.2 The current application follows on from a previous application (18/00747/OP) for up to 120 new dwellings (reduced prior to determination to 107) on the same site, but with access from Briary Lane in the north western corner of the site. That application was refused by NHDC in a notice dated 17 January 2019 for four reasons, of which the first read:

'By reason of its prominent position and the topography of the site, the proposed development would be likely to result in significant localised adverse impacts on both the character of the area and visual receptors. While these impacts could be mitigated to a limited extent, the combination of residential built form on high ground and the associated urbanising infrastructure, including the proposed new road access over the common and development breaking the skyline, would act to occasion a marked and diverse change in the character of the immediate and intermediate locality and wider valued landscape. This adverse impact would represent conflict with the aims of the NPPF and Policies CGB1, SP5, SP12c, NE1 and NE6 of the emerging Local Plan and Policies 6 and 21 of the Saved local plan. This conflict would amount to significant and demonstrable harm that is not outweighed by any other material considerations or benefits.'

1.3 Jon Etchells has carried out this review (and also reviewed the Landscape and Visual Appraisal submitted with the previous proposals, for RSNTG), 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.

1.4 The current 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.

1.5 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 99 new houses on a 8.9ha site (of which around 3.7ha 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 (and do not extend quite as far to the south as they did in the 2018 proposals), 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 Echo Hill by means of a new road through the plot of number 24, which would be demolished (see Photograph 1). The gap between the adjacent properties of numbers 23 and 25 is relatively narrow, and the new access, together with footways to either side, would fill most of it. Levels rise steeply to the south of Echo Hill, and in order to achieve acceptable gradients along the road there would need to be vertical retaining walls to either side of the road as it passes the adjacent rear gardens of numbers 23 and 25, and cutting slopes within the site to the south of those gardens.
- 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.
- 2.5 The main changes from the 2018 application relevant to this review are in terms of a reduction in the number of proposed houses from 107 (as determined) to 99 and a revision in the proposed access, which was previously via Briary Lane. The area shown on the Development Framework Plan for residential development has also been amended, with a slight reduction in its extent to the south, and a reduced area of development in the western part of the eastern (larger) field within the site. However in broad terms the proposal is for a similar quantum of development, on the same site as that previously refused by NHDC.
- 2.6 Briary Lane is proposed for pedestrian and cycle access, and also for use by emergency vehicles. As set out in the Arboricultural assessment of the proposals produced for RSNTG by Sharon Hosegood Associates, the existing bridleway surface is variable and in places poor, and it may be that it will need to be improved to cater for this proposed use, particularly if it is to be adopted. In that case there could, as set out in the Arboricultural assessment, be some significant damage to the roots of the trees alongside the lane. This matter should be resolved prior to determination of the application, with the highway authority advising as to whether (and if so what extent of) resurfacing works would be required.
- 2.7 The proposed development also involves widening of the footway along the south side of Sun Hill, to the east of its junction with Echo Hill. At this point there is a line of mature horse

chestnut and lime trees within a narrow, sloping grass verge. The footway would need to be widened into this grass verge, with a reduction in levels close to the trunks of the trees and excavation to form the widened section of footway. As set out in the Arboricultural assessment, this would be likely to result in significant root loss and the potential need to fell these trees, which are very important to the local street scene and townscape character.

Pre-Application Advice

- 2.8 The 2018 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, listed in the order in which they appear:

- Section 3 of the LVA summarises the planning context, and cites relevant planning policies, with the coverage improved from that of the 2018 LVA, which omitted a number of policies. However, while the LVA notes the content of the 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 4.44 to 4.55 the LVA considers whether the *'site and its immediate context'* comprise a valued landscape in the meaning of Paragraph 170 of the NPPF (there is an error in section 4.55 which refers to Paragraph 109, which is where the matter of valued landscapes was covered in the superseded 2012 version 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 references to the site and its immediate context. 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 170 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. It should also be noted that the assessment of landscape value is important, as it feeds into the assessment of landscape sensitivity, and onwards into the assessment of landscape effects.

- 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, and some inconsistencies in the assessment:
 - 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, 8 and 9 8 for reverse views 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/ Icknield Way across Therfield Heath, to the south east of viewpoint 10 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 (though it does include other viewpoints with no views of the site much further to the south along the Icknield Way).
 - The 2018 LVA also included only one viewpoint in this area (viewpoint 2 as then numbered), which was shown on Figure 6 of the 2018 LVA as being well to the east of the 2020 viewpoint 10. The assessment in the 2018 LVA in Appendix C (labelled as such within the Appendix, but shown in the contents list as Appendix B) was of moderate adverse effects on completion for this viewpoint - the definition of moderate adverse effects in section 2.23 of the LVA is an effect that '*will markedly change the existing views*'. However, the assessment for viewpoint 10 in the 2020 LVA is of minor to moderate adverse effects only, despite the fact that the development would in either case be effectively the same when viewed from this area, and also despite the fact that the photograph used in both the 2020 and 2018 LVAs for these viewpoints is the same. The two LVAs have therefore assessed visual effects on the same view (despite showing viewpoints in two separate locations, one of which must be incorrect) for effectively the same development, but the 2020 LVA has assessed the effects at a lower level. This must cast some doubt on the accuracy and reliability of the assessment.
- The LVA does not give any consideration to the direct effects of the access proposals on the character of Echo Hill - those aspects of the proposals are not mentioned in Section 5.0 of the LVIA, which describes the development. The area along Echo Hill is townscape rather than landscape, but has its own character, and in my view that character would be harmed by the proposed access arrangements.
- Sections 6.11 to 6.14 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 be adjacent to the existing settlement edge, 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 or areas of green infrastructure in association with a large scale residential development would not constitute a net benefit.

- Section 6.15 of the LVA states that effects on the Scarp Slopes South of Royston character area would be minor adverse on completion. The 2018 LVA assessed these effects as minor to moderate adverse - as there has been a reduction of 8 dwellings only (from 107 as determined to 99 as currently proposed) I am not sure why the assessment of effects has been downgraded in that way.
- Section 6.19 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 of the 2018 LVA was 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. However, those definitions were not carried forward into the 2020 LVA, which has no descriptive rationale for the categories of effect listed in its section 2.26.
- Visual effects are set out in section 7 and also in Appendix C. Effects for users of local Public Rights of Way are assessed as up to moderate to major adverse, and effects for local residents are also assessed as up to moderate to major adverse (though for some properties which would experience the complete loss of their presently open, attractive rural views this is in my opinion probably an underestimate) - these are high level adverse effects on a wide range of receptors.

3.2 The LVA does not take into account the potential effects on street trees of the proposed works along Sun Hill, or the potential effects on trees alongside Briary Lane, if resurfacing is required. It is possible that Briary Lane may be retained in its current form, but the widening of the footway along the south side of Sun Hill is part of the proposed development, and the LVA should have taken those works into account in its assessment.

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.*'
- The LVA submitted with the application does quote the above extracts, but it then appears not to take them into account in its assessment of effects - the description and analysis of this character area does not in my view indicate a landscape in which it would be appropriate to locate a residential development of this scale, location and nature. In fact (as quoted in the LVA in section 4.16) it specifically advises against development of this scale, stating that:

'This type of development would not be entirely appropriate within this Character Area, due to its rural and undeveloped character. Visual impacts could be high, due to the panoramic and open views currently experienced. The landscape capacity for small urban extensions is considered to be low.'

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 Echo Hill in the form of the new access, which would pass through a narrow gap between the adjoining properties. The eastern footway alongside the new access would be only 2m away from the flank wall of number 23 Echo Hill, with no room for any mitigatory planting, and the whole arrangement would in my view appear cramped, with the retaining walls adding to that impression. The access would appear as a highly engineered, contrived design out of keeping with its suburban setting. I would also note the comments of the Council's Landscape and Urban Design Officer on the NHDC website, which include the following (and with which I agree):

'There is insufficient information provided for the access off Echo Hill and information that has been given would indicate that it will be unacceptable in landscape and urban design terms'.

6. It also seems likely that the line of mature trees along the south side of Sun Hill could be affected (potentially, as set out in the Arboricultural assessment by Sharon Hosegood Associates, to the extent of felling being required) - this would have a significant effect on the street scene and local townscape character.
 7. It is beyond the scope of this review to comment on highways matters, but in terms of local townscape character I would observe that vehicular access to the site would be from Briary Lane, Sun Hill (see Photograph 2) and Echo Hill, all of which are relatively peaceful, narrow suburban roads with vehicles parked along one side - the additional traffic resulting from 99 new dwellings would be likely to alter the character of these roads and the areas alongside them.
- 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.
 - 4.4 In comparison with the effects of the 2018 proposals, my view is that there would be some differences, primarily in terms of the proposed access, with Briary Lane now relatively unaffected by the current proposals. However, the adverse effects have been transferred to the currently proposed access point off Echo Hill, and would still be significant, and the overall landscape and visual effects of the development would in my view remain broadly the same.

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 the localised adverse effects of the proposed access, its less than comprehensive consideration of viewpoints and views, its failure to consider potential effects on trees along Sun Hill 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 in my view is a valued landscape within the meaning of Paragraph 170 of the NPPF. The landscape of the site would be fundamentally altered by the development.

- There is also potential for significant adverse effects on the line of existing mature trees along the south side of Sun Hill.
- 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 170), 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.

5.5 Turning to the first reason for refusal of the 2018 planning application, most of that reason still applies to the current proposals - the prominent position and topography remain the same, the significant localised adverse impacts on the character of the area and visual receptors are essentially unchanged, and there would still be a marked change in the character of the immediate locality and wider valued landscape. The same reason for refusal should in my view therefore also apply to the current application.

PHOTOGRAPHS

Photographs were taken either on 26 June 2018 or 13 May 2020 as indicated, using a digital camera with a lens approximating to 50mm.



1. View south west across Echo Hill, showing number 24 (in the centre of the view) which would be demolished to make way for the proposed access, which would run between the two properties to either side of number 24. May 2020.



2. View east along Sun Hill - this is a narrow, relatively quiet suburban road. May 2020.



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. June 2018.



3A. Zoom lens view from the same point as Photograph 3, showing the visibility of the site in more detail. June 2018.



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 rising up the slope, beyond the large tree. May 2020.



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. June 2018.



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. June 2018.



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. June 2018.



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. June 2018.



9. View north from the same point as Photograph 8, showing the extensive area of lower ground to the north with views back to the site. May 2020.