
PLANNING APPLICATION 25/01708/OP

LAND OFF ECHO HILL, ROYSTON

**LANDSCAPE COMMENTS, INCLUDING REVIEW OF THE LANDSCAPE AND VISUAL
IMPACT ASSESSMENT SUBMITTED WITH THE APPLICATION**

By Jon Etchells Consulting

August 2025



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 25/01708/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 (and originally set up to oppose the two previous sets of proposals for essentially similar developments on the same site).

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 January 2019. A subsequent application for up to 99 dwellings on the same site and with access from Echo Hill (NHDC reference 20/00744/OP) was then submitted in April 2020, and was refused in April 2021 for two reasons, of which the first read:

'By reason of its prominent position and the topography of the site and location outside the settlement boundary of Royston, the proposed development would be likely to result in significant localised adverse impacts on both the character of the area and visual receptors, particularly when viewed from certain locations on Royston Heath. While these impacts could be mitigated to a limited extent, the combination of residential built form on high ground and the associated urbanising infrastructure, and development breaking the skyline, would act to occasion a marked and adverse 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 and NE1 of the emerging local plan and Policies 6 and 21 of the Saved local plan.'

1.3 Jon Etchells has carried out this review (and also reviewed the Landscape and Visual Appraisals submitted with the previous proposals, for RSNtG), and has over 40 years experience of landscape assessment and design. He has provided landscape advice to a number of local authorities over the last 25 years, including South Lakeland, North West Leicestershire, East Staffordshire, Tonbridge and Malling and Medway Councils, and has reviewed submitted landscape assessments for a variety of developments as part of this work. He has also provided landscape evidence on behalf of Wycombe District Council, North West Leicestershire District Council, East Hampshire District Council, Medway Council, Tonbridge and Malling borough Council, Tate District 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.

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- 1.4 The current planning application was accompanied by a Landscape and Visual Impact Assessment (LVIA), prepared by Icen Projects Limited on behalf of Gladman Developments, and this review considers the approach, content and conclusions of that LVIA.
- 1.5 The Landscape Institute have produced guidance on reviewing LVIA's (Landscape and Visual Impact Assessments, and also LVAs - Technical Guidance Note 1/20, January 2020): this review has been prepared with due regard to that guidance, and covers the following broad areas:
- a) Whether the methodology used in the LVA is appropriate and recognised.
 - b) Whether that methodology has been applied in a consistent and fair manner.
 - c) Whether the coverage and content of the LVA is balanced and comprehensive.
 - d) Whether the LVA contains any significant errors or omissions, and whether there are any deficiencies which could be remedied by the provision of additional information.
 - e) Whether its findings in respect of landscape and visual effects appear to be balanced and reasonable.
- 1.6 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 LVIA 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 LVIA on the likely significance of the landscape and visual effects.

Methodology for Review

- 1.7 In landscape and visual assessments, a distinction is normally drawn between landscape effects (i.e. effects on the character or quality of the landscape, irrespective of whether there are any views of the landscape, or viewers to see them) and visual effects (i.e. effects on people's views of the landscape, principally from residential properties, but also from public rights of way and other areas with public access). Thus, a development may have extensive landscape effects but few visual effects (if, for example, there are no properties or public viewpoints), or few landscape effects but significant visual effects (if, for example, the landscape is already degraded or the development is not out of character with it, but can clearly be seen from many residential properties).
- 1.8 As noted above, no detailed assessment has been undertaken as part of this review, but the consideration of the LVIA submitted with the application has been undertaken with regard to the

methodology set out in the 'Guidelines for Landscape and Visual Impact Assessment', produced jointly by the Institute of Environmental Management and Assessment and the Landscape Institute ('the GLVIA', 1995, revised 2002 and again in 2013), which is the generally recognised methodology for undertaking such assessments.

2. THE PROPOSED DEVELOPMENT

- 2.1 The outline planning application is for up to 84 new houses on a 8.97ha site (of which around 3ha 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 (above Ordnance Datum, or mean sea level) at its northern end to 119m to the south, and the eastern field rises from around 97m AOD in its north western corner to around 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 100m 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 111m contour, running roughly to the east and then south through the eastern field. 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 120m AOD, and secondly development at around 111m 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. 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.
- 2.4 The site and surrounding area are described to a reasonable level of detail within the submitted LVIA, and that description is not repeated here.
- 2.5 The main changes from the 2020 application relevant to this review are in terms of a reduction in the number of proposed houses from 99 to 84, the omission of some off-site highways works which previously could have had implications for some roadside trees, and some

amendments to the area shown on the Development Framework Plan for residential development, with increased separation between the areas proposed for built development and the site boundaries alongside Briary Lane in the western part of the site and to the south of Echo Hill in the north eastern part. However in broad terms the current proposal is for a similar quantum of development, on the same site and with a similar disposition of built development across the site as that previously refused by NHDC.

3. REVIEW OF THE SUBMITTED LANDSCAPE AND VISUAL IMPACT ASSESSMENT

3.1 The application was accompanied by an LVIA, 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 some respects understates the landscape effects which would result from the development. The following should be noted in particular, listed in the order in which they appear:

- Section 2 of the LVIA summarises the planning context, and cites relevant national and local planning policies. However, while the LVIA notes the content of the relevant policies, it does not address the matter of potential conflict with them - that may be more of a planning consideration than a matter for the LVIA, but there would seem little point in citing the policies if the question of agreement or conflict with them is not considered.
- In sections 3.14 and following the LVIA refers to the North Herts Landscape Study (NHLS) , which shows the site as lying within landscape character area 228, the 'Scarp Slopes South of Royston'. The LVIA provides a reasonable summary of the contents of that character assessment, though there are some pages missing from the extracts in Appendix A6. However, while the LVIA correctly notes that the NHLS states that the character area containing the site is of high landscape sensitivity and value, it does not (see below) explain why it comes to different conclusions. It also notes that the NHLS states that urban developments of under 5ha '*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.*' Having noted that, the LVIA then again does not adequately explain why it comes to the significantly different conclusion (in its section 6.9) that '*there is no landscape or visual reason why development at the Site would be unacceptable*'.

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- In section 3.25 the LVIA does state that the characteristics identified in the NHLS do not fully apply to the site, as the adjoining presence of the urban area of Royston has an influence on local landscape character. While that may be true to some degree, the authors of the NHLS were clearly aware of the presence of the town, but chose to apply the descriptions to the entire character area, and references in the NHLS to potential developments would presumably have been in the context of the parts of the character area close to the town, where such development would be more likely to be proposed.
 - In section 4.22 the LVIA refers to views towards the site from the lower-lying areas to the north, stating that the site is '*not readily discernible*' in views from Kneesworth and South End, which are at distances of around 3.5 to 5km. However, the LVIA omits to consider views from the A10 just to north of its junction with the A505, which are from around 2.5km (see Photograph 1). In these views (from a short stretch of the road only, as it passes over a local high point 500m to the north of the A505 roundabout), the site can be seen as part of the mostly wooded hills which enclose the town to the south and form the skyline in views from the north. The new houses on the site would be visible in this view above the remainder of the urban area - the impact on that relatively distant view would not be great, but what this illustrates is that new houses on the site would be visible from a wide area to the north of the town, and 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.
 - In sections 4.23 and following the LVIA considers landscape quality, value and sensitivity, and states that the site is of '*ordinary quality*' and '*not of scenic value*'. In my view that understates the quality of the site's landscape - the site is in itself an attractive area of landscape, with rolling chalk topography. The LVIA has also not carried out a full assessment of landscape value - the Landscape Institute have published guidance on the assessment of landscape value ('Assessing landscape value outside national designations', TGN 02/21, May 2021) which sets out a range of factors to be considered when assessing landscape value, which include natural heritage, cultural heritage, historic or cultural associations, distinctiveness, recreational facilities or use, perceptual/ scenic aspects, wildness and tranquillity. My view is that if such an exercise had been carried out, the site would have additional value in terms of many of those factors, and would have been assessed as of higher than medium value, which is the judgement set out in the LVIA. In this context it is relevant to note that the NHLS character assessment (see above) 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.

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- Section 4.24 also states that (without any supporting analysis) the site does not form part of a valued landscape (in the meaning of Paragraph 187a) of the NPPF). The LVIA does state (in section 4.27) that Therfield Heath itself is a valued landscape, but takes the view that the valued landscape does not extend to the site. Without carrying out a full assessment it cannot be confirmed whether or not the site should be regarded as forming part of a valued landscape, but I would agree with the LVIA that Therfield Heath is a valued landscape, and would note (see below) that the LVIA does assess landscape and visual harm to the heath.
 - Section 5.1 states that the new houses would be no higher than 2 storeys, with '*lower houses*' (which appear to be 1½ storeys in height from the description) on the higher parts of the site. That does not accord with the Building Height Framework Plan on page 38 of the Design and Access Statement (DAS) submitted with the planning application, which shows lower heights in the north eastern corner of the site and in the western field, but two storey houses across the higher parts of the residential development areas within the eastern field. I would also note that the Planning Statement refers (on page 9) to 'bungalows' within the higher parts of the site - neither the DAS nor the LVIA refer to bungalows.
 - Section 5.3 of the LVIA states that the site is '*well related to the adjacent settlement, being bound by modern housing to the north and east*'. That statement does not take into account the fact that the houses to the north and east are set at much lower levels (around 100m in both areas), and also that those to the east are set in substantial, partially wooded plots. Development on the site would extend to the south, out into the countryside, on higher ground than the existing houses to the north and east, and the new houses on the site would be far more prominent and intrusive within the local landscape than the existing residential areas.
 - In section 5.17 the LVIA notes that the new houses on the site would be visible from Therfield Heath, but says that this would be '*in the context of the existing houses which adjoining (sic) the Site on Echo Hill*'. That is the case for some viewpoints (see Photograph 2 below), but there are also other viewpoints (see Photograph 3) where the site is readily visible, but the existing houses are not, and the new houses rising up the sloping landform of the site would be a new and intrusive element. Some of these views are from the Hertfordshire Way/ Icknield Way across Therfield Heath - the view changes along the route, and the LVIA only includes one view (Photograph 18) illustrating the visibility of the new houses. More detailed coverage of this important issue would have been beneficial. Photograph 18 does show that the houses would be visible spreading across the site, significantly increasing the proportion of built development in the view.

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- Section 6.9 concludes that '*there is no landscape or visual reason why development at the Site would be unacceptable*', but the LVIA does (see below) find some significant adverse landscape and visual effects, and whether or not the proposals are acceptable in the light of that harm is a matter for the overall planning balance, not the LVIA.
 - Detailed landscape and visual effects are set out in Appendix A8 of the LVIA, and the initial effects on the landscape of the site itself are assessed as moderate to major adverse, which in the judgement of this review is a reasonable assessment. Turning to the tabular definitions earlier in the same Appendix, that means the effects would be somewhere between '*in complete variance to the baseline landscape. Proposals may have a substantial detrimental effect*', and '*fundamental alterations to the landscape resource or character*'. While there will normally be some degree of adverse landscape effects within a greenfield site, those effects will be at a higher level where (as here) the existing site landscape is rural, attractive and open, with views across the open site from adjoining Public Rights of Way.
 - A separate assessment is made of effects on the landscape character of Therfield Heath, which are assessed as minor to moderate adverse. The LVIA correctly states that the new development would only be visible from a small part of the Heath, but also states that '*From this part of the Heath, the existing town is already readily evident*' - in fact, while there are some views of parts of the town from some (mainly higher) parts of the Heath, the town as a whole is not visible from the south eastern part of the Heath, and in views towards the site from this part of the Heath, views of the existing edge of the settlement are either limited to a few houses along Echo Hill (see Photograph 2 below) or are completely screened. In these views from the Heath (which the LVIA accepts is a valued landscape) the new houses would be an intrusive and locally dominant element. The LVIA states that: '*The development will not materially affect a valued landscape*', and clearly the Heath as a whole would not be significantly affected, but there would in my view be significant adverse effects on the parts of the Heath with views to the site. This view is supported by the assessment further on in Appendix A8 of moderate to major adverse visual effects for people walking across this part of the Heath - landscape and visual effects are different, and are assessed separately, but are clearly related, and in my judgement the landscape effects for this part of the heath should have been assessed at a level similar to the visual effects.
 - Visual effects for residents of the properties along the south side of Echo Hill are assessed as initially major adverse, which is in my view a reasonable assessment - the definition in the Appendix for major adverse visual effects is that '*The proposals*

would be clearly visible and dominant, and would cause a substantial deterioration or improvement to a view from a more sensitive receptor.'

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 area of landscape, with its rolling chalk topography, mature trees to the east and west and expansive views to (and from) 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 NHLS landscape character assessment 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 either 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 LVIA submitted with the application does quote some of 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 set out in the NHLS does not in my view indicate a landscape in which it would be appropriate to locate a residential development of this scale and nature. In fact (as quoted in the LVIA in section 3.22) 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.'

4. The proposed development would be open to view, from the adjacent Public Rights of Way, from other routes across parts of Therfield Heath and (at a greater distance) from a broad swathe of lower lying land to the north, as well as (at very close range) 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 new access would in my view appear out of keeping with its quiet suburban setting, and views into the new development would be possible along it.

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6. 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 and Echo Hill, all of which are relatively peaceful, narrow suburban roads with vehicles parked along one side - the additional traffic resulting from 84 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 and townscape character, and also on views from nearby houses and Public Rights of Way, and from some areas within the valued landscape of Therfield Heath.
- 4.3 In my judgement the LVIA assessment has underestimated effects on the immediate surroundings by perhaps half a category, i.e. effects should be moderate to major adverse on completion, rather than moderate adverse as stated. In my view the effects on Therfield Heath should also be assessed as moderate to major adverse (as opposed to minor to moderate adverse as stated), though those effects would be felt over a relatively small part of the heath, close to the site.

5. CONCLUSIONS

- 5.1 To return to the areas listed in Section 1.5 of this review for consideration, as a result of the review it can be said that (noting again that no detailed assessment has been undertaken as part of this review):
- a) The assessment set out in the LVA does use an appropriate and recognised methodology.
 - b) That methodology has been applied in a generally consistent and fair manner, though some of the effects have in the judgement of this review been assessed at too low a level.
 - c) The coverage and content of the assessment is generally balanced and comprehensive, but does in the judgement of this review underestimate some of the effects.
 - d) The assessment does not contain any significant errors and omissions, though a fuller assessment of landscape value could have been made.

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- e) The findings of the assessment in respect of landscape effects are in the judgement of this review understated, particularly the effects on the local landscape and on the adjoining areas within Therfield Heath. The assessment of visual effects appears to be generally balanced and reasonable.

5.2 The proposed development would in the judgement of this review 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 187a) of the NPPF. The landscape of the site would be fundamentally altered by the development, and the adverse effects would also be felt within the south eastern part of Therfield Heath, close to the site.
- 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 parts 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.
- There would also be significant adverse effects for people living close to the site, in the existing houses to the north and east, where the presently open and rural outlook would be completely lost.

5.3 In terms of policy, the proposals would therefore be contrary to the general landscape protection policies of the NPPF (including Paragraph 187) and Policies SP9, SP12 and NE2 of the adopted 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 2020 planning application, most of that reason still applies to the current proposals - the prominent position and topography of the site remain the same, the significant localised adverse impacts on the character of the area and visual receptors are essentially unchanged, there would still be residential built form on high ground

(noting that the previous proposals were for development up to the 112m contour, and that has been reduced by 1m only for the current proposals, i.e. built development would now extend up to the 111m contour - that would not be a significant or material difference) and there would still be a marked change in the character of the immediate locality and parts of the wider valued landscape. The current proposals are for a similar overall quantum and nature of development on the same site, covering effectively the same areas of land, and there have been no significant changes in the site or surrounding area since the previous refusal - the landscape and visual effects would therefore be at effectively the same level as those for the refused proposals, and the same reason for refusal should in my view therefore also apply to the current application.

Jon Etchells Consulting, 12 August 2025
759-Landscape Comments

PHOTOGRAPHS

Photographs were taken in August 2025, using a digital camera with a lens approximating to 50mm.



1. 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.



- 1A. Zoom lens view from the same point as Photograph 1, showing the location of the site in more detail. The new houses would extend up the sloping landform of the western field, roughly as far as the point of the red arrow.



2. View south east to the site from the 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 eastern field rising up the slope, beyond the large tree, and also the western field on the right of the view. May 2020.



3. View south east to the site from further to the north, 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 both of the fields within the site. The new houses would appear on the skyline in this view.