

Town & Country Planning Act 1990 S78

PROOF OF EVIDENCE

of

John-Paul Friend

HND (LGD) BA Hons Dip LA CMLI

on

Landscape and Visual Matters

on behalf of

St Albans City and District Council

in respect of the development

Outline application (access sought) - Demolition of existing structures and construction of up to 391 dwellings (Use Class C3), the provision of land for a new 2FE primary school, open space provision and associated landscaping. Internal roads, parking, footpaths, cycleways, drainage, utilities and service infrastructure and new access arrangements

at Land South of Chiswell Green Lane, Chiswell Green, St Albans

PINS Ref: APP/B1930/W/22/3313110

LPA Ref: 5/2022/0927

LVIA Ltd Ref: STA1365lpoe

Date: March 2023



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Landscape Proof of Evidence	
Project:	Land South of Chiswell Green Lane, Chiswell Green, St Albans
Status:	Final
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Author:	JPF
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1.0 Introduction

Witness

- 1.1.1 I am John-Paul Friend. I am the Director of LVIA Ltd and I specialise in landscape and visual planning issues associated with development and change.
- 1.1.2 I have provided evidence for planning appeals by inquiry, written representations and hearing for over seven years.

Qualifications

- 1.1.3 I hold a BA (Hons) degree in Landscape Architecture and Post Graduate Diploma in Landscape Architecture from the University of Gloucestershire. I am a chartered member of the Landscape Institute.

Professional Practice

- 1.1.4 I am the Director of LVIA Ltd and I have been practising landscape architecture for 15 years, all in private practice as a Landscape Architect.
- 1.1.5 I have previously been an associate lecturer at the University of Gloucestershire, where I taught undergraduate and postgraduate students on the Landscape Architecture course. I am currently an associate lecturer at the University of the West of England where I teach Environmental Impact Assessment to the undergraduate and postgraduate courses.
- 1.1.6 I have an active involvement in schemes across the United Kingdom. The range of projects in which I have been involved include residential, agricultural, defence, highways and energy. I am also involved in the production of environmental impact assessment, environmental statements and general landscape design. During my professional career I have carried out a substantial number of Landscape and Visual Impact Assessments, Townscape Assessments, Landscape Appraisals and Character Assessments on a wide variety of sites and areas.
- 1.1.7 LVIA Ltd carries out impact assessments, masterplanning, landscape evaluations and detailed landscape proposals for a wide variety of clients. I liaise with local authority officers in many local planning authorities (London boroughs, district and borough Councils) across Britain; and a high proportion of my practice's activity is based on site evaluation and landscape design.
- 1.1.8 I am familiar with the Application Site and its surroundings, having reviewed all relevant background information and undertaken field surveys in February 2023. Before accepting the instruction to act as an expert witness I reviewed all pertinent information and was satisfied that I would be comfortable defending the Council's case on landscape and visual matters.

Declaration of Truth

- 1.1.9 I declare that the evidence which I have prepared and provide for this appeal is true. It has been prepared and is given in accordance with the guidance of the Landscape Institute and I confirm that the opinions expressed are my true and professional opinions.
- 1.1.10 Before I accepted involvement in the project, I familiarised myself with the submitted information and ascertained that I could support the issues identified within the reason for refusal.

1.1.11 The scope of my Proof of Evidence is to deal with the landscape and visual impact issues associated with the site, and the Appellants' submitted Landscape and Visual Appraisal.

Project Involvement

1.1.12 LVIA Ltd were appointed by St Albans City and District Council in January 2023 to prepare landscape and visual evidence in respect of the proposed development at Land South of Chiswell Green Lane.

Scope of Evidence

1.1.13 My evidence addresses the landscape and visual effects of the proposed development. In preparing my evidence I have considered (among other things):

- the application plans,
- the Appellants' Landscape and Visual Impact Assessment dated April 2022 produced by Barton Willmore, now Stantec ("the BWLVIA"),
- the LVIA Note of Clarification dated Sept 2022, and
- the Planning Statement, the Appellants' Statement of Case.

Reasons for Refusal

1.1.14 The Council refused permission for the following reason that refers to landscape and visual matters:

Refusal Reason 1: The proposed development comprises inappropriate development, for which permission can only be granted in very special circumstances, these being if the harm to the Green Belt and any other harm is clearly outweighed by other considerations (paragraph 148 NPPF 2021). We do not consider that the benefits outweigh the harm caused by this proposed development due to the harm to the Green Belt openness and purposes relating to encroachment to the countryside, urban sprawl and merging of towns. The harm also relates to landscape character and the loss of agricultural land. The proposal is therefore contrary to the National Planning Policy Framework 2021, Policy S1 of the St Stephen Parish Neighbourhood Plan 2019-2036 and Policy 1 of the St Albans District Local Plan Review 1994.

2.0 The Proposed Site: Local Context and Character

Site Character and Boundaries

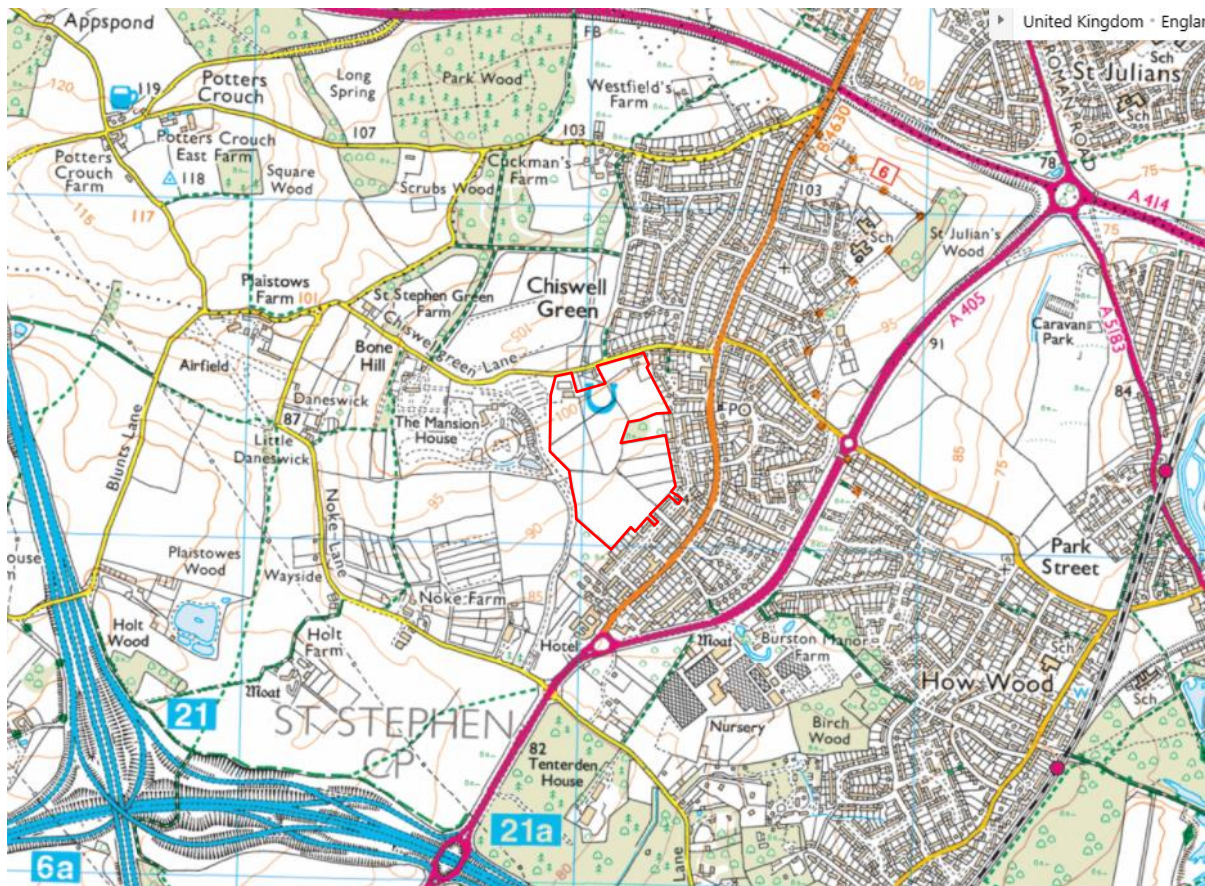


Image 1: Site location shown on 1:25000 OS map base

- 2.1.1 The site is located to the west of the settlement edge of Chiswell Green. The total site area is approximately 14 hectares and is centred on N51°43'32, W00°21'50. The site is proposed to be accessed from Chiswell Green Lane. The site sits alongside the settlement edge of existing dwellings that are situated along Hammers Gate, Forge End, Long Fallow and Chiswell Green Lane.
- 2.1.2 The site is currently generally undeveloped and arranged as a handful of fields that are laid to agricultural and equestrian use. These fields are subdivided by a combination of fencing and hedgerows in some locations, with pockets of woodland adjacent to the redline in the local landscape.
- 2.1.3 Miriam Lane sits to the west of the site and forms a physical barrier to the fields beyond that are generally in agricultural use that are interspersed with built elements related to light industrial and agricultural uses. A defunct facility (Butterfly World Project) sits to the west of the site. This is mainly formed by areas of hardstanding and storage with a few buildings scattered throughout the area.
- 2.1.4 The site sits within no areas of national designation related to landscape. The entire site area falls within the Metropolitan Green Belt. The site sits outside of the defined settlement boundary.

- 2.1.5 Within the site itself, it appears relatively tranquil although visual connectivity exists with dwellings to the east, north and south with some detracting elements noticeable in the form of pylons and road noise from transport corridors in the wider area.
- 2.1.6 Views from within the site provide links to the generally well vegetated agricultural landscape to the west.
- 2.1.7 The landscape to the west of the site that is mainly experienced by users of PRoW represents a landscape that although exhibiting features that relate to energy infrastructure remains generally tranquil in its nature.
- 2.1.8 The development would form a partial encroachment into the landscape that sits to the west of the current settlement boundary of Chiswell Green in this location.

3.0 The Submitted Landscape and Visual Appraisal

- 3.1.1 The BWLVIA that accompanies the application has been considered as part of this proof of evidence.
- 3.1.2 The methodology provided within Appendix 1 of the BWLVIA complies with the approach set out in Guidelines for Landscape and Visual Impact Assessment (Third Edition), published by the Landscape Institute and the IEMA (2013) (GLVIA). However, that does not necessarily mean that I agree with every judgment within the BWLVIA.
- 3.1.3 With this in mind, I will provide my views on the outcomes and identify where my judgement varies from the outcomes of the submitted BWLVIA in the following chapters of this document.
- 3.1.4 Where paragraphs are stated, they refer to the BWLVIA unless otherwise detailed. Sections of the text stated within the BWLVIA will be provided where useful for ease of reference but should be read in conjunction with the LVIA for full detail.

4.0 Landscape Sensitivity and Effects

4.1.1 Section 5.0 Published Landscape Character Context of the BWLVIA provides information regarding the various levels of Landscape Character Assessment.

Published Landscape Character Sensitivity

4.1.2 It is agreed that the site falls within published National Character Area (NCA) 111: Northern Thames Basin. The NCA is given a medium value, a low susceptibility, and an overall low sensitivity to change.

4.1.3 At a more local level, the Hertfordshire Landscape Character Assessment is identified. It is noted that the site falls within the Landscape Character Area (LCA) 10: St Stephens Plateau. It is agreed that the site falls within this LCA.

4.1.4 The LCA is given a medium value, a low susceptibility, and an overall medium sensitivity to change.

4.1.5 Supporting text is provided to detail the process that was undertaken to categorise the character areas. Both outcomes appear reasonable levels of sensitivity for the published character areas at a national and more local level.

Landscape Receptors Sensitivity

4.1.6 The following landscape features have been identified as receptors for the assessment of effects arising from the proposed development in section 6.0 Site Appraisal and Visual Context of the BWLVIA:

- Open Fields, which are given a value of low and a susceptibility of high and have an overall medium sensitivity;
- Native Hedgerow, which are given a value of low and a susceptibility of low and have an overall low sensitivity;
- Canopy Trees, which are given a value of medium and a susceptibility of medium and have an overall medium sensitivity;
- The Character of the Site and its Immediate Vicinity, which are given a value of low and a susceptibility of medium and have an overall medium sensitivity.

4.1.7 The sensitives provided for the four landscape receptors seem to be at an appropriate level.

Landscape Assessment – Effects on Landscape Character

4.1.8 The BWLVIA states that there would be a very small magnitude of change upon the **NCA 111** which when combined with the low sensitivity would result in a Negligible Adverse effect at year 1. This seems a reasonable assessment.

4.1.9 At year 15 with the establishment of a mitigation strategy, it is stated that the change would reduce to a Neutral Adverse effect. Again, I agree with this conclusion.

4.1.10 The **LCA** has been given a small magnitude of change, which when combined with the medium sensitivity would result in a Minor Adverse effect at year 1. I agree with this level of effect on the LCA.

4.1.11 At year 15 with the establishment of a mitigation strategy, it is stated that the change would reduce to a Negligible Adverse effect. Again, I agree with this conclusion.

4.1.12 The assessment of the character of the site and its immediate vicinity is detailed at paragraph 8.6 onwards as being subject to a large magnitude of effect which when combined with a medium sensitivity give a Major Adverse effect at year 1. This seems a reasonable assessment of the effect of the development on the overall site character.

4.1.13 At year 15 with the establishment of a mitigation strategy, it is stated that the change would reduce to a Neutral effect. I disagree with this outcome as although there would be landscape features created, there would still be an adverse effect on landscape character. I believe the change would reduce to a Minor Adverse level assuming that the development is in the form as detailed on the submitted Landscape Masterplan and that the measures establish as illustrated. This is because there would remain a limited deterioration to the landscape resource formed by the encroachment of development into the site.

Landscape Assessment – Effects on Landscape Features

4.1.14 The **open fields** receptor has been given a large magnitude of change, which when combined with the medium sensitivity would result in a Major Adverse effect at year 1. I agree with this level of effect on the receptor.

4.1.15 At year 15 with the establishment of a mitigation strategy, it is stated that the change would reduce to a Minor Adverse effect. Again, I agree with this conclusion.

4.1.16 The **native hedgerow** receptor has been given a small magnitude of change, which when combined with the low sensitivity would result in a Negligible Adverse effect at year 1. I agree with this level of effect on the receptor.

4.1.17 At year 15 with the establishment of a mitigation strategy, it is stated that the change would reduce to a Moderate Beneficial level. In this case it is my view that there would be a Negligible Beneficial effect as there will be some additional planting but the existing structure of hedgerows with removals made for access routes through the site will be evident and they will not be restored, rather slightly improved.

4.1.18 The **canopy trees** receptor has been given a small magnitude of change, which when combined with the medium sensitivity would result in a Neutral effect at year 1. I agree with this level of effect on the receptor.

4.1.19 At year 15 with the establishment of a mitigation strategy, it is stated that the change would reduce to a Major Beneficial effect. I agree with this conclusion as the existing trees would be retained and additional trees planted alongside the development.

Section Conclusions

4.1.20 The sensitivities of the landscape character and receptors appear to be reasonable, and I generally agree with the levels put forward.

4.1.21 The levels of change appear generally reasonable and I only disagree with the effects at a year 15 stage on native hedgerows and on the character of the site and its immediate vicinity, which I consider will reduce to a Minor Adverse level rather than Neutral.

5.0 Visual Sensitivity and Effects

5.1.1 This section will present the results of my independent analysis of the assessed visual outcomes of the site based on the methodology used in the BWLVIA.

Visual Sensitivity

5.1.2 As before, all following chapters, page numbers and paragraphs in this section refer to the BWLVIA unless otherwise stated.

5.1.3 Table 6.2 – Summary of Sensitivity of Landscape Receptors provides detail on the sensitivity attributed to various visual receptors. This is reproduced below for ease of reference:

Table 1: Table 6.2 – Summary of Sensitivity of Landscape Receptors (Reproduced from BWLVIA)

Receptor	Value	Susceptibility	Sensitivity
Residents of properties on the settlement edge of Chiswell Green	Low	High	Medium
Users of Chiswell Green Lane.	Low	Medium	Medium
Users of Long Fallow, Forge End and Woodlea	Low	Low	Low
Pedestrians on PRow St Stephen 082	Low	High	Medium
Pedestrians on PRow St Stephen 028	Low	High	Medium
Pedestrians on PRow St Stephen 022	Low	High	Medium
Workers at the commercial estate on Miriam Lane	Low	Low	Low

5.1.4 Within GLVIA at paragraph 6.33 it states:

The visual receptors who are most susceptible to change are generally likely to include:

- *residents at home;*
- *people, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focused on the landscape and on particular views;*
- *visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience;*
- *communities where views contribute to the landscape setting enjoyed by residents in the area.*

Travellers on road, rail or other transport routes tend to fall into an intermediate category of moderate susceptibility to change. Where travel involves recognised scenic routes awareness of views is likely to be particularly high.

5.1.5 I would contend that the value of view from a residential dwelling does not fall within the low category as it represents in this case the permanent change to the visual baseline from living spaces. A dwelling represents the place a person will go for shelter and therefore I believe the value of these receptors should be high.

5.1.6 In GLVIA paragraph 6.37 at the first bullet point it states:

Judgements should also be made about the value attached to the views experienced. This should take account of:

- *recognition of the value attached to particular views, for example in relation to heritage assets, or through planning designations;*

5.1.7 As the site falls within the Metropolitan Green Belt, a planning designation which is affected by openness, both spatial and visual, this suggests that views should be considered of a higher value. Consequently, I consider residents and users of PRow within the area as having a high overall sensitivity as they also have a high susceptibility to change.

5.1.8 I consider users of Long Fallow, Forge End and Woodlea to be of a medium overall sensitivity as they are communities where views contribute to the landscape setting of the settlement and are of landscape that falls within the designated Green Belt.

5.1.9 I agree that users of Chiswell Green Lane would be of a medium sensitivity and that workers at Miriam Lane would be of a low sensitivity to change.

Visual Assessment

5.1.10 **Residents on the settlement edge of Chiswell Green** are considered subject to a large magnitude of change, which when combined with the medium sensitivity would result in a Moderate Adverse effect at year 1.

5.1.11 I agree with this level of effect on the receptor but believe that the sensitivity of the receptor should be high. Therefore, it is my view that with a high sensitivity and a large magnitude of change, there would be a Major Adverse effect.

5.1.12 At year 15 with the establishment of a mitigation strategy, it is stated that the change would reduce to a Negligible Adverse effect. In my view, with a high sensitivity, it would result in a Minor Adverse effect. This is because the existing residents would continue to be aware of the change with noise, movement and lighting characteristic of this type of development in views even once mitigation measures have established.

5.1.13 **Users of Chiswell Green Lane** are considered subject to a large magnitude of change, which when combined with the medium sensitivity would result in a Moderate Adverse effect at year 1. For the most part I agree with this assessment, but there will be a short section where effects will be larger near to the site access.

5.1.14 At year 15 with the establishment of a mitigation strategy, it is stated that the change would reduce to a Negligible Adverse effect. I consider that the change will reduce to a Minor Adverse effect due to the higher change associated with the access on the wider receptor.

5.1.15 **Users of Long Fallow, Forge End and Woodlea** are considered subject to a small magnitude of change, which when combined with the low sensitivity would result in a Neutral effect at year 1.

5.1.16 I agree with this level of effect on the receptor but believe that the sensitivity of the receptor should be medium as the view between dwellings and into the site from field boundaries will allow noticeable change. Therefore, it is my view that with a medium sensitivity and a small magnitude of change, there would be a Negligible Adverse effect.

- 5.1.17 At year 15 with the establishment of a mitigation strategy, it is stated that the change would reduce to a Minor Beneficial effect. I believe this change will reduce but to a Negligible Beneficial effect as the built form and the enclosure it forms will be perceptible albeit with additional trees and vegetation planted alongside it.
- 5.1.18 **Pedestrians of PRoW St Stephen 082** are considered subject to a very small magnitude of change, which when combined with the medium sensitivity would result in a Negligible Adverse effect at year 1.
- 5.1.19 I disagree with this level of effect on the receptor as the PRoW approaches Chiswell Green Lane near to the proposed main access of the site. I also believe that the sensitivity of the receptor should be high. Therefore, it is my view that with a high sensitivity and a medium magnitude of change, there would be a Moderate Adverse effect.
- 5.1.20 At year 15 with the establishment of a mitigation strategy, it is stated that the change would reduce to a Neutral effect. In my view, with a high sensitivity, it would result in a Minor Adverse effect. This is because the existing residents would continue to be aware of the new road into the site and the associated noise, movement and lighting characteristic of this type of development even once mitigation measures have established.
- 5.1.21 **Pedestrians of PRoW St Stephen 028** are considered subject to a very small magnitude of change, which when combined with the medium sensitivity would result in a Negligible Adverse effect at year 1.
- 5.1.22 I disagree with this level of effect on the receptor as the PRoW as the users walks along its length there will be varying views of the site available. I also believe that the sensitivity of the receptor should be high. Therefore, it is my view that with a high sensitivity and a small magnitude of change, there would be a Minor Adverse effect.
- 5.1.23 At year 15 with the establishment of a mitigation strategy, it is stated that the change would reduce to a Neutral effect. In my view, with a high sensitivity, it would result in a Negligible Adverse effect. This is because parts of the built form on site would be visible set within the mitigation planting which will have established, but the settlement will appear to extend closer to the viewer than the current baseline.
- 5.1.24 **Pedestrians of PRoW St Stephen 022** are considered subject to a very small magnitude of change, which when combined with the medium sensitivity would result in a Negligible Adverse effect at year 1.
- 5.1.25 I agree with this level of effect on the receptor but believe that the sensitivity of the receptor should be high. Therefore, it is my view that with a high sensitivity and a very small magnitude of change, there would be a Minor Adverse effect.
- 5.1.26 At year 15 with the establishment of a mitigation strategy, it is stated that the change would reduce to a Neutral effect. In my view, with a high sensitivity, it would result in a Negligible Adverse effect.
- 5.1.27 **Workers at the commercial estate on Miriam Lane** are considered subject to a small magnitude of change, which when combined with the low sensitivity would result in a Minor Adverse effect at year 1.
- 5.1.28 I agree with this level of effect on the receptor and the sensitivity of the receptor.

5.1.29 At year 15 with the establishment of a mitigation strategy, it is stated that the change would reduce to a Negligible Adverse effect. I also agree with this effect.

Overall Section Conclusions

5.1.30 The process undertaken to assess the visual receptors appears reasonable and is in line with guidance.

5.1.31 I believe some of the receptors would be of a higher sensitivity to change as described due to the guidance within GLVIA and the fact that the site sits in a site covered by a planning designation – Green Belt.

5.1.32 I have identified some locations where I judge that there will be higher visual effects as a result of the scheme. It is agreed that the mitigation measures that are outlined on the Illustrative Masterplan will have the effect of reducing visual effects from the wider landscape to the west, but not remove them totally.

5.1.33 The proposal will introduce an awareness of built form of a residential nature that will appear to extend the existing settlement edge to the west to viewers from the west.

6.0 Green Belt

- 6.1.1 Green Belt is not considered a landscape designation, but as highlighted by the Sam Smith decision (R (Samuel Smith Old Brewery (Tadcaster) and others) v North Yorkshire County Council [2020] UKSC 3) the visual effects of a development on the openness of Green Belt can be considered of relevance to landscape.
- 6.1.2 There is a difference between impacts on visual amenity, which are normally considered within the process of LVIA and the visual aspects of openness which are considered as part of Green Belt Assessment.
- 6.1.3 In LVIA an assessment is made on the effects of development on views available to people and their visual amenity and how this may affect character and scenic quality. In consideration of Green Belt, an assessment is made on the effects of development on the visual openness of the Green Belt including impacts on views, links to the wider Green Belt, inter-visibility between settlements and whether measures could be proposed that would restore the baseline aspects of openness.
- 6.1.4 Openness can have both spatial and visual aspects meaning both visual impacts and volume of development can be of relevance. This is generally considered alongside the duration and remediability of the development and the degree of activity likely to be generated, such as traffic.
- 6.1.5 This development of a residential nature and therefore considered to be permanent.

Visual Openness

- 6.1.6 The visual aspect of openness as it relates to the green belt is not measured in the same way as would be the case with a visual assessment. That change is visible is proof of harm in terms of openness.
- 6.1.7 Consequently, if the proposals are visually intrusive they will affect openness regardless of residual visual effects. That the site is currently seen in the context of the settlement edge is irrelevant, it will appear to extend the settlement to the west. This visual connection with the landscape to the west is common ground and identified within the UBLVIA.
- 6.1.8 In the recent Secretary of State decision; (Haydock Point - Land at A580 East Lancashire Road / A49 Lodge Lane File Ref: APP/H4315/W/20/3256871), dealing with visual openness on a site that has urban influences, paragraph 8.9 of the Inspector's conclusions states:
- In visual terms, external views of the site are relatively local and the M6 and A580, the Holiday Inn and the grandstands and other buildings of Haydock Park Racecourse lie close to its eastern, southern and northern boundaries respectively. Almost immediately west of the M6 is the extensive Haydock Industrial Estate (HIE). However, the proximity of these urban influences and features would do nothing to offset but, on the contrary, would serve to emphasise the permanent loss of openness, notwithstanding the relative containment of external views. Moreover, the proposed landscape bunding and tree screening round the site, intended to soften the appearance of the buildings in the landscape, would aggravate the obvious loss of the essential and fundamental openness of the Green Belt. That loss carries substantial planning weight against the appeal. [4.17-22, 5.6]*
- 6.1.9 The Green Belt Review Sites & Boundaries Study (February 2014) was published by St Albans City and District Council to provide a detailed and robust assessment of the eight identified

strategic sub-areas in the district. The site falls within sub-area S8: Land at Chiswell Green. Page 102 of the document provides a plan which illustrates local key views and areas of higher and lower sensitivity.

6.1.10 The site falls within the south-east area that is identified as being of lower landscape/visual sensitivity.

6.1.11 It is noted on page 101 within the table under the heading landscape character:

Built development would affect openness of landscape character. However, the landform and vegetation provide enclosure, and would help contain and provide a framework for development. The land to the east of the access road to Butterfly World has more connection with the countryside to the west, but is separated from this by the road and this will increase as the young planting matures.

6.1.12 It is also noted within the table under the heading views/visual features:

Key potential visual effects of new development would be at a local level. Notable effects would be in relation to residents on the western edge of Chiswell Green and dispersed properties within this part of the sub-area.

6.1.13 This is identified within the visual analysis of the site. This would contribute to the settlement appearing to extend to the west from the current settlement edge and would negatively affect the fundamental aim of green belt, preventing urban sprawl by keeping land permanently open in visual terms.

6.1.14 There will therefore be a very substantial visual loss of openness.

Spatial Effects

6.1.15 It is stated within the committee report dated 03.05.22 at paragraphs 8.3.4 to 8.3.7:

It is clear that the loss of open Green Belt land would be permanent. The c.13.96ha site is currently predominantly grassland, split into four fields by trees. The site also comprises the former Chiswell Green Farm buildings in the north east and Chiswell Green Riding School in the north west, which makes up around 1.4ha of the site and include a combined built footprint of approximately 1,009sqm.

Although the exact extent of built form would only be measurable at reserved matters stage, the submitted Land Use Parameter Plan shows that c.8.73ha (c. 87,300sqm) of the site would be in residential use (including roads, parking, associated infrastructure and incidental areas of open space), whilst c.1.89ha (18,900sqm) of land would be safeguarded for a new 2 form-entry (2FE) primary school. The built up area of the site would therefore be c.10.62ha (106,200sqm) in total, with the remaining 3.34ha (33,400sqm) being green infrastructure (including public open space and amenity space, children's play areas, landscaping and ecological enhancement work, footpaths, cycle ways, drainage, utilities and service infrastructure).

The Building Heights Parameter Plan shows that dwellings across the majority of the site would be up to 2.5 storeys in height, with apartment blocks of up to three storeys towards the centre of the site. The primary school would be a maximum height of 15.5m, as detailed in the Building Heights Parameter Plan.

The construction of up to 391 dwellings plus associated infrastructure on the site would clearly represent a significant permanent loss of openness in spatial terms to this part of the Green Belt,

contrary to the aforementioned fundamental aim of Green Belt policy to keep land permanently open. This is the spatial aspect of openness referred to in the part of the NPPG quoted above.

6.1.16 The above described volumes remain an approximation as there are limited details of the house types proposed, but using an average dwellinghouse footprint of development seems a reasonable approach.

6.1.17 Permanent built form at two to three storey scale would stretch across the majority of the appeal site, which would substantially erode openness compared to the existing open character of the site. In addition, there would be significant loss of spatial openness associated with the proposed parking, access roads, fencing, lighting and other associated infrastructure.

6.1.18 I therefore consider that in addition to the substantial increase in permanent development as proposed the scheme will significantly increase the visual perception of enclosure and reduce further the openness of the site and this part of the Green Belt. In addition to the visual harm to openness there would be a very substantial spatial loss of openness due to the height, volume and scale of the build form proposed.

Activity

6.1.19 Chiswell Green Lane is currently relatively quiet with few vehicular movements and only limited pedestrians present during my visits to site.

6.1.20 As a result of the proposed additional dwellings within the green belt the area will become busier, with additional walkers and vehicular movements related to the sites permanent change to residential development effecting the local and wider landscape.

6.1.21 Vehicular movements in particular are identified and quantified within the relevant evidence base as submitted.

Section Conclusions

6.1.22 As identified within the committee report, spatial harm will clearly occur as a result of this development on open fields.

6.1.23 The change will be permanent, and no remediation can occur that would re-establish the current visual openness. This will therefore affect the openness of the visual aspect of the green belt adversely.

6.1.24 Additionally, the additional movement created as a result of the proposed residential site use would increase activity in the surrounding area.

6.1.25 There will be very substantial harm to spatial, and visual openness and activity in the area will increase as a result of the proposals.

7.0 Cumulative Effects

- 7.1.1 As this site comes forward at the same time as another of a similar scale that is located nearby, the change that will be experienced cumulatively would be greater than if both were considered in isolation.
- 7.1.2 Although a cumulative assessment is not necessarily required for the non-EIA level LVIA it seems a reasonable assumption that the change that would be experienced as a result of both sites coming forward would be cumulatively larger in experience.
- 7.1.3 These effects would not be constrained only to landscape and visual change, but also would affect other areas of the baseline.

8.0 Summary Proof and Conclusion

8.1.1 I am John-Paul Friend, I am the Director of LVIA Ltd and I specialise in landscape and visual planning issues associated with development and change. I am a Chartered member of the Landscape Institute.

8.1.2 I have considered the submitted Landscape and Visual Impact Assessment (BWL VIA) and take the view that the LVA process was undertaken in accordance with GLVIA.

Landscape Section Conclusions

8.1.3 The sensitivities of the landscape character and receptors appear to be reasonable, and I generally agree with the levels put forward.

8.1.4 The levels of change appear generally reasonable and I only disagree with the effects at a year 15 stage on native hedgerows and on the character of the site and its immediate vicinity, which I consider will reduce to a Minor Adverse level rather than Neutral.

Visual Section Conclusions

8.1.5 The process undertaken to assess the visual receptors appears reasonable and is in line with guidance.

8.1.6 I believe some of the receptors would be of a higher sensitivity to change as described due to the guidance within GLVIA and the fact that the site sits in a site covered by a planning designation – Green Belt.

8.1.7 I have identified some locations where I judge that there will be higher visual effects as a result of the scheme. It is agreed that the mitigation measures that are outlined on the Illustrative Masterplan will have the effect of reducing visual effects from the wider landscape to the west, but not remove them totally.

8.1.8 The proposal will introduce an awareness of built form of a residential nature that will appear to extend the existing settlement edge to the west to viewers from the west.

Green Belt

8.1.9 As identified within the committee report, spatial harm will clearly occur as a result of this development on open fields.

8.1.10 The change will be permanent, and no remediation can occur that would re-establish the current visual openness. This will therefore affect the openness of the visual aspect of the green belt adversely.

8.1.11 Additionally, the additional movement created as a result of the proposed residential site use would increase activity in the surrounding area.

8.1.12 There will be very substantial harm to spatial, and visual openness and activity in the area will increase as a result of the proposals.

Cumulative Effects

8.1.13 Although a cumulative assessment is not necessarily required for the non-EIA level LVIA it seems a reasonable assumption that the change would be experienced as a result of both sites coming forward would be cumulatively larger in experience.

8.1.14 These effects would not be constrained only to landscape and visual change, but also would affect other areas of the baseline.

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