

PLANNING APPEAL

Land at Bradmore Way, Brookmans Park

Reference APP/C1950/W/22/3307844

PUBLIC INQUIRY

Proof of Evidence: Landscape

By Jed Griffiths MA DipTP FRTPI

For the Combined Objectors Group

February 2023

INTRODUCTION

1. My name is Jed Griffiths. I am a chartered town planner and a Fellow of the Royal Town Planning Institute. I am a Past President of the Institute. I hold a Master's Degree in Geography from the University of Durham and a Diploma in Town Planning from the University of Newcastle-upon-Tyne.
2. I have lived and practised in Hertfordshire for over 50 years. A summary of my qualifications and experience is attached as Appendix 1. Today, I am giving evidence at this inquiry on behalf of the Combined Objectors' Group (COG), which consists of the North Mymms District Green Belt Society, the Brookmans Park Action Group, and CPRE Hertfordshire – the Countryside Charity.
3. The scope of the evidence which I am giving was set out in the COG Statement of Case dated 30th November 2022. In this proof I will elaborate on the potential harm caused by the proposed development to the landscape character of the appeal site and the surrounding area

LANDSCAPE STATEMENT OF COMMON GROUND

4. With regards to the landscape character of the appeal site, COG has received a copy of the Landscape Statement of Common Ground (SOCG) which was signed between the Borough Council and the appellant's landscape consultant on 6th January 2023. In response to the statement, COG concurred with the majority of the matters of agreement and disagreement between the parties. The baseline characteristics of the site, as set out in part 1, are recognised. It is noted that it is located within the Potters Bar Landscape Character Area (LCA54), and that the stated aim is to improve and restore the area as a whole. As I have argued below, this strategy does not necessarily apply to the appeal site itself.
5. I note that the appellant's Landscape and Visual Impact Statement and methodology is broadly in accordance with GLVIA3 (Guidelines for Landscape and Visual Impact Assessment, 3rd Edition), published in 2013. However, as discussed below, I do not fully agree with the approach adopted.
6. Although the site is not a valued landscape for the purposes of the National Planning Framework (NPPF), paragraph 170a, it has an intrinsic character which is valuable to the local community of Brookmans Park.

7. Reference in part 3 to the comments made by the Borough Council's Landscape and Ecology Manager is a statement of the officer's personal judgment. It is recognised that "a decision as to whether the developments meets the criteria for development within the Green Belt will have to be made."
8. I note that in part 4, it is agreed that there will a loss of agricultural land. In point 4.4, the parties agree that there will be some beneficial features contained in the proposed landscape scheme. This may be so, but on balance they will not compensate for the loss of the site to housing development. On point 4.5, I have commented that the scheme in itself may not cause coalescence between Brookmans Park and Welham Green, but it would impinge on the important gap between the two settlements.
9. On the visual effects and the effects on openness (parts 5 and 6), I concur with the points of agreement between the two parties. I note that the loss of openness would be both visual and spatial.
10. Part 7 of the SOCG shows that there are fundamental points of disagreement between the Council and the appellant about the impact of the proposed development on local landscape character. This viewpoint is shared by COG in its support for the Council's second reason for refusal.

POLICY BREACHES

11. The development is clearly contrary to the "saved" policies D1, D2, and RA10 of the Welwyn Hatfield District Plan. In particular, the proposal fails against policy RA10. As pointed out in the case officer's report, there is a fundamental change from an open agricultural field to an urban housing estate. In no way does the development contribute to the conservation, maintenance and enhancement of the local landscape character.
12. I support the Council's view that the potential harm to the landscape must carry substantial weight against the proposed development. My reasons are set out below in this proof.

VISUAL IMPACT

13. In the SOCG, at points 5.5 and 5.6, there is recognition that the proposed development would result in visual effects in Bradmore Way and Peplins Way. Within then LVIA, there are several references to the southern boundary of the site and its “suburban character influences”. It is contended in the LVIA that the development tin the 1930s of Bradmore Way and Peplins Way had already caused a loss of open landscape character. In terms of its visual amenity, the LVIA states that the site had a “medium susceptibility” to accommodate the proposed development. The reason appears to be that it was already influenced by suburban development, with “urban fringe characteristics” at the urban edge.
14. In my view these points are over-stated in the LVIA. Inspection of the site will show that there are no urban fringe features at the settlement edge. There is a very clean break between the residential area and the open countryside beyond, with the view to the north dominated by an open agricultural field. The introduction of a residential estate, on an open field at a higher level, would have substantial harmful effect on the visual amenity of the site and the surrounding area.
15. In the summary on visual amenity, the LVIA (at paragraph 5.3.4) considers that the development would have a “slight adverse effect at the settlement edge” and a “slight to negligible effect to the landscape resource and landscape character of the area.” At the same point, the LVIA acknowledges that the development would have a “resonant and noticeable effect on the site itself.” In my view this contradiction could be interpreted as a clear recognition of the potential harmful impact on the landscape as a whole.
16. Central to the appellant’s case on landscape is the assertion that the proposed development can be screened and absorbed into the existing landscape pattern. This is amplified in Chapter 6 of the LVIA on visual effects. A number of viewpoints towards the site were included I the analysis and shown in Figure 1 of Appendix A of the LVIA. These viewpoints have been agreed with the Borough Council, as stated in point 5.1 of the COCG. COCG also agrees with the set of viewpoints, although more positions within the golf course would be helpful to the Inspector. There can be little or no dispute about the accuracy of the photographs in Figure 9, most of which show that the site cannot be seen from various points in the local area. These points are summarised in Part 5 of the SOCG. Therefore, the key issues around the visual impact are concerned with the impact within the site and its surroundings.

CHARACTER

17. In my opinion, the appellant's Landscape and Visual Impact Assessment (LVIA) is too focused on the visual effects of the proposed development on the landscape. There are many other factors which contribute to the existing quality and character of the landscape. To illustrate the point, I attach as an appendix Figure 2 of the Natural England report *An Approach to Landscape Character Assessment*, published in 2014. The diagram shows that there are a wide range of considerations which form part of the professional judgment of landscape character.
18. In my view, the LVIA lacks the wider professional judgment – thus it underestimates the landscape character and the harmful effects of the development. For example, at paragraph 3.4.4 of the LVIA, it is acknowledged that the site has “some attributes of local character” but “no attributes of rarity.”
19. As noted in the LVIA, the site is located within the Potters Bar Parkland Landscape Character Area (LCA54), as described in the Hertfordshire Landscape Character Assessment. The LCA report shows how the settlement of Brookmans Park was inserted into the areas of historic parkland once associated with the mansions of Gobions and Brookmans Park. Two golf courses in the LCA make use of this historic landscape structure. At Brookmans Park, the golf course contribution of the golf course to the rural setting of the appeal site is underplayed in the LVIA. In the section on viewpoints, it is described as “man-made” and as a business.
20. In reality, the golf course contains a number of features which were part of the original parkland designed by Humphrey Repton in the 18th century. Accordingly, it is not (as suggested in paragraph 6.34 of the LVIA) a visual receptor of low sensitivity. The SOCG acknowledges, at point 5.7, that there would be visual effects to the users of the golf course. The appellant, however, considers that the proposed development would have a “slight adverse effect” on LCA54. In my view, it is much more than that. The introduction of a substantial housing development adjacent to the golf course, on what is currently an open field, would have a significant adverse effect on the integrity of the landscape of the golf course and on LCA54 as a whole.

21. Overall, the assessment of the visual effects misses the essential point about the openness of the site and its rural character. This is shown very clearly in the LVIA and the aerial views of the site (Figure 8) and the views from within (Figure 11). It is agreed that the appeal site is an open agricultural field. I attach photographs which show the character of the site at the time prior to the hay harvest. It is a truly rural scene, part of a working landscape. There can be no doubt that development housing development on the site would cause substantial harm to the landscape character of the area. The essence of character extends beyond the purely visual aspects of the proposed development – it is about the whole experience of being on and around the site.

22. The LVIA considers that the landscape of the site is of moderate value and that it is of moderate sensitivity overall. In view of the wider considerations of landscape character, I believe that the rating should be at least “moderate-high”.

23. It is noted in the SOCG (point 7.7) that the appellant considers that the landscape scheme would provide the opportunities to deliver the LCA strategy and Guidelines for Managing Change: Improve and Restore. I fail to see how this could be achieved by the change from an open agricultural field to a housing estate. One of the key aims of the LCA approach is to protect and enhance the existing features of character and value. In that respect of the site and its pattern of husbandry is the most robust solution for the future. I, therefore, do not believe that shielding would protect the character of the rural area.

SUMMARY

24. In summary, COG fully supports the Borough Council in its rejection of the proposed development which is the subject of this appeal. In terms of **landscape** character, evidence shows that the appeal site is an attractive area which is actively farmed. No amount of screening can compensate for its loss.

25. With regards to the visual aspects, the impacts will be most pronounced from the golf course and from the Bradmore Way residential area. There will be a significant and harmful effect on the visual openness of the site and its surroundings.

26. For the reasons I have set out in this proof, the Inspector is respectfully urged to dismiss this appeal.

Jed Griffiths MA DipTP FRTPI

Hertford

10th January 2023