



June 2023

Land South of Shenley Hill, Radlett
WD7 7BD

Landscape Proof of Evidence

of:

Clive Self

MA (Urb Des) Dip LA CMLI

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on behalf of:

Fairfax Acquisitions Ltd

Report No: CSA/4964/03

CD 7.6

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1.0 EXECUTIVE SUMMARY

- 1.1 The Site extends to approximately 11.45 hectares and comprises an irregular shaped field and a small area of deciduous woodland which borders the south eastern edge of Radlett. The Site is bound to the north by Shenley Hill and to the south by Theobald Street.
- 1.2 The northern and central sections of the western boundary follow the rear garden boundaries of the properties served off Newberries Avenue, Williams Way and Faggotts Close. This boundary comprises a mix of domestic fencing and hedgerows with intermittent tree cover. The gardens are relatively long and the properties are readily visible from within the Site.
- 1.3 Newberries Primary School, which has access from Newberries Avenue, is indented into the south west corner of the Site.
- 1.4 To the southeast of the Site is an extensive area of woodland that encloses the Site and serves to detach it from the wider countryside.
- 1.5 The Appeal Site was Draft Allocation Site R3 in the Regulation 18 version of the emerging Local Plan. The Local Plan has now been set aside. The draft allocation identified the Site for around 195 new homes of which 40% were to have been affordable homes; land for the expansion of Newberries Primary School; land reserved for a future relocation of the Red House GPs surgery and public open space.
- 1.6 The Appeal Scheme comprises a development that mirrors the draft allocation. It will not only deliver much needed housing but will also deliver a range of community facilities which will be available to new and existing residents alike.

Designations

- 1.7 The Site lies outside of the settlement boundary of Radlett and within the Metropolitan Green Belt. It is not covered by any statutory or non-statutory designations for landscape character or quality. Similarly, it does not carry any heritage designations. There are no Tree Preservation Orders on the Site and it is not considered to be a Valued Landscape for the purpose of para 174a of the NPPF and the LPA have not suggested otherwise.

Green Belt Studies

- 1.8 Draft allocation R3 was informed by two Green Belt studies. The Stage 2 Green Belt Assessment of 2019, produced by ARUP, is the most relevant.

That Assessment sub-divides the Borough into a series of smaller parcels with the Appeal Site falling within RA-8 (SA 75).

- 1.9 In respect of Parcel RA-8 (SA 75), the strategic assessment section of the report concluded that:

'.....As a result of its scale and location between the settlement edge and Gorse Woodland, with limited connection with the wider countryside, the removal of the sub-area is unlikely to impact the performance of the wider strategic Green Belt' (my underlining).

- 1.10 Given the scale of development proposed, and from my observations on the Site and from the neighbouring area, I similarly do not consider that the Site plays a fundamental role in relation to the wider Green Belt.

HELAA 2019

- 1.11 The HELAA of 2019 was prepared by Council Officers and identified the Appeal Site as Site HEL 358 with the capacity to accommodate 254 dwellings.

Landscape Sensitivity

- 1.12 The Outline Landscape Appraisal for potential development sites in Hertsmere, that was prepared by LUC in 2020, identified the Site as 14: HEL 358. The summary said that the *'site has the potential to accommodate housing and smaller flats as long as the Theobald Street Wood Local Wildlife Site is protected..'*. The summary said that the sensitivity to development was low and that the site could be developed for mixed residential use with few constraints.
- 1.13 Table 2.1 of the Outline Appraisal summaries the sensitivity of the 23 sites that were assessed. The summary of sensitivity to development, ranges from moderate/high to low. It is highly relevant to note that of the 23 sites assessed, the Appeal Site (Site 14) was the only one assessed as having low sensitivity to development.
- 1.14 It is evident from the studies that are referred to above that the Site was consistently identified as suitable for development and for release from the wider Green Belt.

Visibility

- 1.15 It is rare to find such a well contained site on the edge of a settlement, such as the Appeal Site. The depth of woodland which surrounds the external boundaries of the Site will largely prevent winter views into the body of the Site from the wider countryside.

- 1.16 Opportunities for public views into the Site are strictly localised and for the most part are confined to the Site frontage with Shenley Hill and its immediate environs. There will also be opportunities for near distance views from the neighbouring properties and to a lesser extent the occasional view from the roads and footpaths that serve them.
- 1.17 With the development in place, views of it will mostly be confined to the Site frontage and in such views the modest amount of housing that faces onto Shenley Hill will read as a very minor extension to the settlement. It will also complement the prevailing pattern of frontage development on Shenley Hill.

Landscape Impact

- 1.18 There is no vegetation within the body of the Site to constrain development. The vehicular access from Shenley Hill and the attendant visibility splays will require the removal of a short section of hedgerow. The emergency access and pedestrian/cycle link from Theobald Street will require the removal of a small number of trees.
- 1.19 Compensatory planting can be carried out throughout the development to make up for any tree and hedgerow loss and a landscape and ecological management plan will be in place to ensure that the new habitats are maintained in an appropriate manner. The Appeal Scheme will also deliver BNG.
- 1.20 Development on the Site will result in a substantial change to the Site's character and that is an inevitable consequence of developing any greenfield site. However, landscape and townscape effects on the wider area will be extremely limited on account of the scale of the proposed development and the enclosure provided by neighbouring woodland.

Relationship to Radlett

- 1.21 The Appeal Site has a strong relationship to Radlett, with Newberries Primary School and existing housing extending along the entirety of its western boundary. There is also housing fronting onto Shenley Hill, immediately to the northwest of the Site.
- 1.22 The scale and configuration of the proposed development would also be compatible with the neighbouring area and would similarly complement the nucleated settlement pattern of Radlett.
- 1.23 The density of the development would be higher than the prevailing density of development in Radlett, but land is a finite resource and

needs to be developed in a more efficient manner than it has been in the past. A higher density development would also have the benefit of bringing forward a greater range of properties, from starter homes to family housing.

Green Belt Impact

- 1.24 The Site currently falls within the Metropolitan Green Belt, which covers approximately 80% of Hertsmere. The proposed development would constitute inappropriate development in the Green Belt and the case that sets out the very special circumstances for development is addressed in the Planning Evidence. A brief summary of the potential impact of the proposed development on the first four purposes of the Green Belt are set out below.

To check the unrestricted sprawl of large built-up areas

- 1.25 As set out in the Hertsmere Stage 2 Green Belt Assessment, Radlett is not considered to constitute one of the district's large built-up area. It will therefore not conflict with this purpose.
- 1.26 Whether or not Radlett is considered to be a large built up area is largely irrelevant as it is apparent that development on the Site would not result in unrestricted sprawl as the Site boundaries are clearly defined and defensible and would for the most part prevent the proposed development from being seen from the wider Green Belt.

To prevent neighbouring towns from merging into one another

- 1.27 Radlett is variously described as a town and a village. It is relatively large with over 8,000 residents, it has a range of facilities, and is served by the Midlands Mainline railway.
- 1.28 The nearest settlements to Radlett are Borehamwood and Shenley with the land that separates these settlements from Radlett falling within the Green Belt. While the proposed development would result in a minor reduction in the gap between Radlett and Shenley, the containment provided by the woodland that borders the Site, would prevent intervisibility between the two settlements.
- 1.29 When traveling from Radlett to Shenley on Shenley Hill/Shenley Road, the limited amount of development that is proposed on the Site frontage, would only be visible for a very short distance and there would continue to be a significant area of woodland and open countryside separating the two settlements.

- 1.30 This very minor reduction in the gap between Radlett and Shenley would only be experienced from the Shenley Hill frontage, and its immediate environs, on account of the alignment of the road and the extensive area of woodland that contains the Site. Once past the woodland one would pass through an area of open countryside and experience a clear break between the settlements with no intervisibility between them.

To assist in safeguarding the countryside from encroachment

- 1.31 Any development on a greenfield site will result in an element of encroachment. However, the Site's visual relationship with the neighbouring residential area of Radlett and the enclosure provided by the adjacent dense woodland means that the development will not visually or physically encroach into the wider countryside.

Preserve the setting and special character of historic towns.

- 1.32 Radlett has two Conservation Areas which lie at the heart of the settlement. There is no relationship between these two Conservation Areas and the Appeal Site on account of the intervening suburban development. Development will therefore not harm the historic setting of the settlement and Hertsmere District Council have not suggested otherwise.

Overall Conclusion on Green Belt

- 1.33 It is unusual to find a Green Belt Site, on the edge of a sustainable settlement, that has such robust and defensible boundaries and where there are virtually no opportunities for views of it from the neighbouring countryside/Green Belt.
- 1.34 My overall conclusion on the impact of the proposed development on the Green Belt is consistent with the findings of ARUPs Stage 2 Green Belt Assessment (CD4.27 page 66) which stated that '*the removal of the sub-area [The Appeal Site] is unlikely to impact the performance of the wider strategic Green Belt*'.
- 1.35 Landscape impacts would similarly be strictly limited and localised and any minor loss of vegetation can be compensated for by new planting. BNG will also be delivered.

2.0 QUALIFICATIONS AND EXPERIENCE

- 2.1 I am a Chartered Landscape Architect and an Urban Designer. I hold a Diploma in Landscape Architecture and a Master's Degree in Urban Design. I have over 30 years' experience in landscape and townscape design and assessment.
- 2.2 I am the Managing Director of CSA, a multi-disciplinary environmental planning practice which I established in 1998. The practice acts for the public and private sector and has an in-house team of urban designers, ecologists, heritage consultants and landscape architects. We operate from offices in Sussex, Hertfordshire, Hampshire, Cambridgeshire and Worcestershire.
- 2.3 Prior to forming CSA I was responsible for landscape architecture and masterplanning at PRC Fewster Architects and before that I was employed in a similar role at Sargent and Potiriadis Architects. I have worked throughout the UK, Middle East and the United States on a broad range of landscape projects, townscape appraisals and environmental planning work.
- 2.4 My company is currently involved in projects that range from the masterplanning of new settlements to the redevelopment of inner city brownfield sites. We work throughout the UK in both the rural and urban environment.
- 2.5 I have given landscape and urban design advice on numerous greenfield and green belt sites across the country. I have also given landscape and urban design evidence at Local Plan/LDF Inquiries, Section 77 and 78 Inquiries, and CPO Inquiries.
- 2.6 The evidence that I have prepared and provide for this appeal is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

3.0 BACKGROUND AND METHODOLOGY

Background

- 3.1 This evidence is submitted on behalf of Fairfax Acquisitions Ltd in respect of a planning application for the erection of: *up to 195 new homes (45% affordable), safeguarded land for the expansion of Newberries Primary School and provision of a new medical centre, along with associated access. Outline application to include the matter of access (with the following matters reserved: appearance, landscaping, layout and scale).*
- 3.2 CSA Environmental has been involved with the Appeal Scheme from the outset of the planning application and colleagues at CSA produced the Landscape and Visual Impact Assessment ('LVIA') (CD 1.4) and Green Belt Assessment (CD 1.5).
- 3.3 The planning application was taken to Committee on the 23rd of February 2023 and recommended for refusal. Three reasons for refusal were put forward and these were endorsed by the Committee with the decision notice issued on the 2nd of March 2023.
- 3.4 My evidence addresses the first reason for refusal which claims harm to the Green Belt. The reason for refusal does not specify landscape harm as a reason for refusal but as that has been raised by a number of objectors to the planning application, I also address that matter.
- 3.5 The first reason for refusal is as follows.

01. Refusal reason: Inappropriate and harmful development in the Green Belt

Per paragraph 11 of the National Planning Policy Framework (2021) the presumption in favour of sustainable development applies. Planning permission should therefore be granted, unless the application of policies within the NPPF that protect areas or assets of particular importance (which includes land designated as Green Belt) provides a clear reason for refusal.

The proposed development is considered to be inappropriate development in the Green Belt, given that it would fail to comply with any of the defined exceptions at paragraphs 149 and 150 of the NPPF. A case for Very Special Circumstances has been made by the applicant, outlining a number of benefits of the scheme. However, officers consider that these benefits when taken together are insufficient to outweigh the harm to the Green Belt, by reason of inappropriateness

and due to the significant harm to openness that would arise. Accordingly, Very Special Circumstances do not arise here.

Therefore the proposed development is considered to be contrary to the NPPF (2021), Policies SP1, SP2, and CS13 of the Hertsmere Local Plan Core Strategy (2013) and Policy SADM26 of the Hertsmere Local Plan Site Allocations and Development Management Policies Plan (2016).

- 3.6 The second and third reasons for refusal relate to matters of archaeology and surface water drainage.

Methodology

- 3.7 My evidence is based on the assessment contained within the submitted LVIA, which was produced by a colleague at CSA. I have also visited the Site and surrounding area on a number of occasions.
- 3.8 From my observations on Site, and from the neighbouring area, I am in agreement with the conclusion of the LVIA that the landscape impact of the development on the wider landscape would be extremely limited. The impact on the function of the wider Green Belt would similarly be extremely limited.
- 3.9 Photographs contained in **Appendix C** have been taken from within the Site or from public vantage points within the vicinity.
- 3.10 Photographs were taken using a digital camera with a lens focal length approximating to 50mm, to give a similar depth of vision to the human eye. In some instances images have been combined to create a panorama. Photographs were taken during periods of good visibility. The photographs and visualisations within this report have been prepared in general conformance with the Landscape Institute's Technical Guidance Note 06/19, as set out in the methodology within the LVIA.
- 3.11 Place Services, who are the Landscape Consultants the LPA use for landscape advice, stated that the LVIA had been carried out in general accordance with the Landscape Institutes Guidance. Their consultation response to the application on the 11th of November 2022 said:

The application has been supported by a Landscape and Visual Impact Assessment (LVIA) undertaken by CSA Environmental. Generally, the LVIA has been carried out in accordance with the principles set out within the 'Guidelines for Landscape and Visual Impact Assessment' Third Edition (GLVIA3) prepared by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA).

- 3.12 The caveat that Place Services made, that the LVIA is ‘generally .. in accordance’ with the Institute's Guidance is not substantiated in any way. This is unsurprising as the Landscape Institute's Guidance is exactly what the title says i.e. it is guidance as opposed to a methodology which must be adhered to. This is made clear in the preface to GLIVA 3 which states that:

‘This edition concentrates on principles and process. It does not provide a formulaic ‘recipe’ that can be followed in every situation – it remains the responsibility of the professional to ensure that the approach and methodology adopted are appropriate to the task in hand...’

- 3.13 As the LVIA provides a comprehensive assessment of landscape and visual effects of the proposed development then I consider that it is entirely appropriate for the ‘task in hand’. I would also add that we undertake LVIAs on a wide of projects throughout the country and on not one occasion has a LPA, the Inspectorate or SoS said that the methodology we follow is not fit for purpose.

Green Belt

- 3.14 As far as I'm aware, there is no specific methodology set out in Government policy for assessing the impact of development on the Green Belt. CSA have developed their own methodology for assessing the impact of development on the 5 purposes of the Green Belt, which are set out in NPPF. The methodology used in that assessment is set out in the Green Belt Assessment prepared by CSA, with a summary in this evidence. I also consider the Green Belt studies which have been undertaken on behalf of Hertsmere Borough Council, which, amongst other things, informed the allocation of the Site in the draft Local Plan. I also summarise the impact on openness, from both a spatial and visual point of view.

Planning Policy Context

- 3.15 The key landscape and planning policies of relevance to the Site have been summarised in the LVIA and as such I do not replicate them here. Rather, my evidence addresses the specific landscape and Green Belt related policies which are cited in the reason for refusal.

Background Character Studies

- 3.16 The LVIA includes a summary and consideration of the various Landscape Character Assessments and background studies relating to landscape. I have not replicated those assessments here but have referred to the localised landscape and Green Belt studies.

4.0 DESCRIPTION OF THE SITE AND SURROUNDING AREA

- 4.1 The LVIA provides a detailed description of the Appeal Site and neighbouring area. In the following chapter I therefore only provide a summary of the key characteristics of the Site and neighbouring area, rather than duplicate that information. I have also summarised the key visual receptors.
- 4.2 The tables in **Appendix F** also provide a summary of the anticipated landscape and visual effects from a number of receptors.

Local Context

- 4.3 The Site comprises an irregular shaped field and an area of deciduous woodland which borders the south eastern edge of Radlett. It is bound to the north by Shenley Hill and to the south by Theobald Street. The Site location and its immediate context are illustrated on the Site Location Plan and Aerial Photograph in **Appendices A** and **B**.
- 4.4 To the west, the Site is bordered by 20th century detached housing on Newberries Avenue and Williams Way. These properties are relatively large and comprise a mix of 2 and 2 1/2 storey dwellings which typically have hipped roofs. There are also a series of bungalows, that are served off Faggotts Close, at the north western end of the Site. Newberries Primary School and playing fields are indented into the south western part of the Site.
- 4.5 There is a swathe of mature woodland, that is approximately 100 metres deep, that separates the open part of the Site from Theobald Street to the south. Beyond Theobald Street are a series of irregular shaped fields that gently fall to The Brook and the Midlands Main Line Railway.
- 4.6 To the east of the Site is an extensive area of deciduous and coniferous woodland, which is approximately 400m deep. Beyond this there are a series of irregular shaped fields that are subdivided by established hedgerows, with intermittent tree cover, and swathes of woodland.
- 4.7 The northern boundary of the Site adjoins Shenley Hill. On the opposite side of the road is a swathe of woodland which borders the southern edge of Porters Park Golf Club.

Settlement Pattern

- 4.8 Radlett has a nucleated settlement pattern that is bisected, in a broadly north – south alignment, by the Midland Mainline Railway and Watling

Street. The railway corridor is typically heavily vegetated and Radlett Station lies at the centre of the settlement.

- 4.9 The historic core of Radlett is encapsulated within a Conservation Area which lies to the west of Watling Street. Beyond the Conservation Area the prevailing pattern of development is that of low density detached and semi detached housing, which mainly date from the post war era. These properties are mainly 2 and 2 ½ storeys high. There are also areas of higher density development which mostly comprises 3 storeys flats.
- 4.10 The northern edge of Borehamwood is approximately 1.5 km to the southeast of the Site with the western edge of Shenley approximately 1km from the Site.

Radlett Character Assessment (December 2016)

- 4.11 As part of the preparation of the Radlett Neighbourhood Plan a character assessment of Radlett was produced. That assessment only looks at the areas within the settlement boundary and therefore does not consider the Site.
- 4.12 The character assessment identifies character areas based on a streetscape analysis of buildings within Radlett. The properties that border the western edge of the Site fall within two quite similar categories. The housing on the southern part of the western boundary are identified as Class B, and those on the northern section as having a Class C residential street character.
- 4.13 Class B streets are described as: *'plots overlooking streets of strong character in terms of the properties of the building form. Class B areas present a strong unity in two of the following parameters: building heights, façade widths and/or façade setback from the street'*.
- 4.14 Class C streets are described as: *'plots overlooking streets of strong character in terms of a particular property of the building form. Class C areas present a strong unity in one of the following parameters: building heights, façade widths or façade setback from the street'*.

Landscape Character

- 4.15 The LVIA contains a description of the National Character Area. As the Appeal Site is relatively small, I therefore only refer to the district character assessment.

Country Landscape Character

- 4.16 The Hertfordshire Landscape Character Assessment divides the county into a series of Landscape Character Areas ('LCAs'), with the Site lying within the High Canons Valleys and Ridges Landscape Character Area 21.
- 4.17 High Canons Valleys and Ridges LCA extends from the eastern edge of Radlett to Borehamwood and the A1/M25 and covers the southern half of Shenley. The area comprises a series of undulating ridges and valleys, with significant areas of woodland, scattered trees and overgrown hedgerows. The key characteristics of the High Canons Valleys and Ridges LCA are described as:
- *'a series of narrow settled ridges of sinuous form;*
 - *slopes to the south east comprise mainly medium to large arable fields and more open character;*
 - *slopes to the west and north east comprise a more intact landscape of small/medium pasture and numerous field oaks;*
 - *woodland blocks and copses scattered throughout the area, both around houses and more extensively to the west where they combine with mature parkland landscapes at the edge of Shenley Park and Porters Park golf course;*
 - *prominent built edge to Borehamwood and associated pylons dilute the rural character; and*
 - *good range and use of local building materials.'*
- 4.18 In terms of visual and sensory perception, the assessment states that locally the area has a strong sense of enclosure and cohesion and that it is relatively peaceful. In terms of rarity and distinctiveness, the assessment states that the landscape type is relatively frequent in the county, the most distinctive elements being treed and settled ridges.
- 4.19 The Site displays some of the characteristics of the wider LCA. It gently slopes and is medium to large scale arable farmland (although at the time of the Site visit it was laid to grass). It is bordered by a large area of woodland, which provides enclosure to the Site and the eastern edge of Radlett. The Site's sense of tranquillity is reduced on account of the intervisibility with the housing which backs onto the Site's north western boundary.

Hertsmere Landscape Sensitivity Assessment (2020) (CD4.25)

4.20 The Landscape Sensitivity to Residential and Employment Development Assessment was produced by Land Use Consultants (LUC) on behalf of Hertsmere Borough Council in September 2020. That study is based upon the Hertfordshire County landscape character areas and subdivides the area into a series of smaller assessment units. The Appeal Site is located within LCA 21: High Cannons Valleys and Ridges and Assessment Unit 21b: Radlett Fringe.

4.21 The Radlett Fringe assessment area borders the eastern edge of Radlett and includes the Site; farmland to the north; Porters Park Golf Club; and the woodland to the south and east. The assessment provides the following sensitivity analysis for Assessment Unit 21b:

'The Radlett fringe is a combination of agricultural fields, deciduous woodland copses, Porter's Park Golf Course (former parkland and a Local Wildlife Site) and a coniferous plantation. Kitwells Brook creates local topography changes. The presence of some elevated ridges (and the setting these provide to Radlett), mature trees and deciduous woodland, Kitwells Brook, and public rights of way increase sensitivity to development, although the area's sensitivity is reduced by its location on the urban edge of Radlett and the enclosure provided by existing woodland...'

4.22 Sensitive features that are identified include woodlands; meadows (some of which are LWS); intact hedgerows/mature trees; areas of remnant parkland character and parkland trees; and visually prominent slopes and ridges. The assessment states that any development should be located in visually enclosed areas, avoiding open/visible ridges which provide a setting to Radlett. The assessment concludes that the wider assessment unit has a moderate sensitivity to 'medium density' mixed residential development.

Outline Landscape Appraisal for Potential Development Sites in Hertsmere 2020 (Extract in Appendix G)

4.23 The Outline Landscape Appraisals of potential development sites in Hertsmere, that was prepared by LUC in 2020, identifies the Site as 14: HEL 358 and states that the '*site has the potential to accommodate residential housing and smaller flats as long as the Theobald Street Wood Local Wildlife Site is protected*'. The summary says that the sensitivity to development was low and that the site could be developed for mixed residential use with few constraints.

- 4.24 Given the containment provided to the Site by the dense area of woodland to the south and east; the fact that the Appeal Site borders residential development along the entirety of its western boundary; and that a primary school is indented into its southwestern boundary, then it is entirely reasonable to assess it as low sensitivity.
- 4.25 The LUC Outline Appraisal primarily addresses anticipated landscape and visual effects, but as development within the Green Belt has both a spatial and visual component, then there is inevitably an overlap between anticipated landscape and visual effects and the function of the selected sites against Green Belt purposes.
- 4.26 Paragraph 1.7 of the Outline Appraisal identifies the approach that has been undertaken in appraising the function of the selected sites. This includes consideration of '*how would development on the site affect settlement pattern and separation between settlements? (including settlements outside the Borough)*'. As separation of settlements is one of the main purposes of the Green Belt, then the Outline Appraisal is helpful in informing judgements on the function of the various sites against that purpose of the Green Belt.
- 4.27 Table 2.1 of the Outline Appraisal summaries the sensitivity of the 23 sites that were assessed. The summary of sensitivity to development, ranges from moderate/high to low. It is highly relevant to note that of the 23 sites assessed, the Appeal Site (Site 14) was the only one that was assessed as having a low sensitivity to development.

Green Belt Context

- 4.28 The Hertsmere Stage 1 Green Belt Assessment of 2017 (CD4.26) sets out the history of the Green Belt in the district. Section 2.1 of the document states:

'...The Hertfordshire County Development Plan (published in 1951 and approved by the Minister for Housing and Local Government in 1958), and brought forward in the First Review of the County Development Plan by Hertfordshire County Council (published in 1964 and approved in 1971) extended the Green Belt to the north of the County along the A1(M) corridor. A further two iterations of the Plan extended this still further to cover most of Hertfordshire.

Shortly afterwards, in 1974, the Borough of Hertsmere was established, encompassing Bushey Urban District, Potters Bar Urban District, Elstree Rural District and parts of the Watford Rural District (Aldenham). The Borough inherited the defined Green Belt boundaries, which have remained largely unaltered since (my emphasis).'

Green Belt Context of Radlett

- 4.29 The Stage 2 Green Belt Assessment identifies 5 settlements within Hertsmere which should be considered in respect of the second purpose of the Green Belt i.e. to prevent towns from merging. The two settlements of relevance to the Appeal Site, and its relationship to Radlett, are Shenley and Borehamwood. The relationship of these two settlements to the Appeal Site is considered in Section 5 of this evidence.
- 4.30 Radlett has a nucleated settlement pattern and is inset into the Metropolitan Green Belt. The Site lies within the countryside and borders the settlement edge of Radlett along the entirety of its western boundary.
- 4.31 Newberries Primary School, which lies immediately to the southwest of the Site, also lies within the Green Belt. The neighbouring countryside, which comprises a mix of woodland, farmland and a golf course similarly falls within the Green Belt.
- 4.32 The Green Belt covers almost 80% of Hertsmere District which is virtually all of the land that falls outside of the boundaries of the principal settlements. As a consequence, if current and future housing need is to be met then the Green Belt boundary will need to be reviewed or land within it released for development.

Stage 1 Green Belt Assessment 2017 (CD4.26)

- 4.33 Given the extent of the Green Belt within Hertsmere and the inevitable need to release land from it, Hertsmere Borough Council commissioned Arup to undertake a Stage 1 Green Belt Assessment in 2017 to inform the emerging Local Plan. That assessment was carried out at a strategic level to assess how different areas of Green Belt land, within the Borough, performed against Green Belt purposes.
- 4.34 The study identifies the Appeal Site as forming part of Green Belt Parcel 30 (Land adjoining Radlett) which encompasses a large area of land that borders Radlett to the west, Shenley to the northeast and Borehamwood to the south.
- 4.35 The report assessed the parcel as a whole as meeting purposes 1 and 2 moderately; meeting purpose 3 strongly due to its low coverage of built form and strong rural character; and as not meeting purpose 4 as it did not adjoin the historic part of Radlett.

4.36 The report then went on to identify the scope for further sub division and identified the north western part of the parcel, which borders Radlett and includes the Appeal Site, as a sub section.

4.37 The sub section (CD4.26 Page C11 &12) was described as:

'This area, bounded by dense wooded [sic] to the east and south, the edge of Radlett to the west and Shenley Road to the north, is relatively small in scale and makes only a limited contribution to the gap between Radlett and Shenley (purpose 2). Furthermore, it is visually more connected to the settlement edge and has a limited relationship with the wider countryside to the east'[my underlining].

4.38 It is apparent from the above description that the Stage 1 Green Belt Assessment took account of the function of the various parcels, in both spatial and visual terms.

4.39 The report recommended that the north western sub-area should be considered further. At para 6.3.9 it stated that:

'Green Belt Parcel 30 scores strongly against the NPPF purposes, but there is clear scope for sub-division. The north-west of the Parcel, adjacent to Radlett, which may score less strongly, should be considered further.'

Stage 2 Green Belt Assessment 2019 (CD4.27)

4.40 Following the Stage 1 Assessment, Arup then produced a more refined Stage 2 Assessment to ensure that the Council had made every effort to identify appropriate land to meet identified housing need.

4.41 Stage 2 of the Green Belt Assessment subdivides the Stage 1 Parcels into a series of sub areas with the Appeal Site falling within RA-8 (SA 75).

4.42 Sub Area 75 covers the Appeal Site and is described on page 66 of the Assessment as being:

'...located to the east of Radlett, performs moderately overall. The sub-area does not meet Purpose 1 as it is not at the edge of a distinct large built-up area, and performs moderately against Purpose 2, forming a small part of the gap between Radlett and Borehamwood, and preventing ribbon development from Radlett. It is also noted that the Gorse Woodland to the south-east of the sub-area provides an additional buffer to the physical or perceptual coalescence of settlements. The sub-area performs moderately against Purpose 3, as it is formed of open fields with limited built form, contributing to a largely rural character. It is however noted that the sub area has a strong sense

of enclosure, with limited links to the wider countryside. The sub-area does not meet Purpose 4'.

RA-8 (SA-75) – South of Shenley Road, Radlett



Figure 1 Extract from Stage 2 Assessment

4.43 It is apparent from reviewing the Aerial Photograph in **Appendix B** that the neighbouring woodland separates Radlett and the Appeal Site from the wider countryside and that development on the Appeal Site would not result in the actual or perceived coalescence with any neighbouring town or village.

4.44 The Stage 2 Report then went on to say that:

'As a result of its scale and location between the settlement edge and Gorse Woodland, with limited connection with the wider countryside, the removal of the sub-area is unlikely to impact the performance of the wider strategic Green Belt' (my underlining).

HELAA 2019

- 4.45 The HELAA of 2019 identified the Appeal Site as Site HEL 358, Land South of Shenley Road, Radlett. Site HEL 358 is identified as having the capacity to accommodate 254 dwellings.

Hertsmere Draft Local Plan (Regulation 18, September 2021)

- 4.46 Hertsmere Borough Council published the Draft Hertsmere Local Plan (Regulation 18) in September 2021. The Draft Local Plan has now been set aside but it effectively endorses the findings of the background Green Belt and landscape studies that identified the Site as a suitable candidate for development.
- 4.47 Although the Draft Local Plan has been set aside, the Green Belt studies that informed it, remain as part of the evidence base and as such are relevant.
- 4.48 The Draft Local Plan identified the Site as 'Site R3, Land South East of Shenley Hill, Radlett'.
- 4.49 Draft Policy H10 stated that Site R3 had the potential to deliver approximately 195 new homes; land to facilitate future expansion of Newberries Primary School; reserve land for the future relocation of Red House Surgery; and accessible areas of public open space.
- 4.50 The policy identified a number of environmental and compensatory Green Belt improvements, including:
- *'Establish physical and visual buffers to the adjacent Porters Park LWS and The Gorse LWS;*
 - *Protect and Enhance Theobald Street Wood LWS; and*
 - *Provide a strategy for on and off-site geo-conservation and arrangements for ongoing future access to the in-situ puddingstone, the adjoining Plantation puddingstone and nearby countryside.'*
- 4.51 The draft policy also identified the need for an agreed masterplan and a design code to ensure that a high quality development could be delivered. The need to maintain residential amenity standards of the properties to the north of the Site was also identified.
- 4.52 While I acknowledge that the Draft Local Plan has been set aside, development on the Appeal Site has been configured in such a manner as to deliver the social, environmental and compensatory Green Belt

improvements set out above, in addition to much needed market and affordable housing.

Statutory and Non-Statutory Designations

- 4.53 The Site is not covered by any statutory or non-statutory designations for landscape character or quality. Similarly it does not carry any heritage designations.
- 4.54 The adopted Local Plan identifies the Site as a Regionally Important Geological Site ('RIGS'). This non-statutory designation relates to the presence of Hertfordshire Puddingstone. However, the HELAA Site Assessment (2019) acknowledged that an initial geoconservation assessment that was carried out on behalf of the promotor, found that it was in an unfavourable condition. This has since been validated by the Hertfordshire RIGS Group who has indicated that the Site should be delisted. This matter is addressed more fully in the Planning Evidence.
- 4.55 The woodland in the southern part of the Site, which forms part of Theobald Wood, is also identified as part of a Local Wildlife Site ('LWS'). Potter Park Golf Club to the north of the Site and the woodland at The Gorse a short distance east, are also identified as LWS.

Site Description

- 4.56 The Site extends to approximately 11.45ha. The greater part of the Site comprises an irregular shaped field which is currently laid to grass. An area of mature deciduous woodland, which forms part of Theobald Wood, occupies the southernmost part of the Site.
- 4.57 The northern and central sections of the western boundary adjoin the rear garden boundaries of the houses fronting onto Newberries Avenue, Williams Way and Faggotts Close. These boundaries comprise a mix of domestic fencing, hedgerows and scrub. There is also intermittent tree cover.
- 4.58 Newberries Primary School is indented into the southwestern corner of the Site and has a vegetated boundary. The southern boundary of the school is separated from Theobald Street by Theobald Wood, in a similar manner to the Appeal Site.
- 4.59 The northern edge of the Appeal Site follows Shenley Hill where there is a gated access into the field. The boundary is marked by a weldmesh fence, barbed wire, and by an outgrown hedgerow with intermittent tree cover.

- 4.60 To the east, the boundary follows the edge of the neighbouring woodland. The woodland is a mix of coniferous and deciduous trees.

Public Rights of Way

- 4.61 There is no public access onto the land and no public footpaths crossing it. At the north eastern tip of the Site, a public footpath passes through the neighbouring woodland, in a south-westerly direction.
- 4.62 Approximately 1 km to the south east of the Site is the Hertfordshire Way which follows a north east to south west alignment through the neighbouring countryside.

Topography

- 4.63 The Site gently slopes in a south easterly direction from the edge of Radlett to the neighbouring woodland and to Theobald Street.
- 4.64 To the east of the Site the land rises to the woodland at The Gorse. To the north of the Site, the land gently falls to Kitwells Brook before rising again on the opposite side of the brook. To the south of the Site, the land continues to fall to the Brook, before rising once more towards Watling Street/Cobden Hill.

Visibility

- 4.65 An assessment of the visibility of the Site was undertaken as part of the LVIA and a series of photographs taken from public vantage points. The viewpoints are illustrated on the Location Plan and Aerial Photograph contained in **Appendices A** and **B** and on the photographs in **Appendix C**.
- 4.66 It is readily apparent from these photographs that the Site benefits from a high degree of visual containment which means that there are very few opportunities for public views into the Site.
- 4.67 The key views of the Appeal Site and anticipated effects of the development are set out in the tables in **Appendix F** and a brief summary is provided below.

Near and Middle Distance Views

- 4.68 There are some limited opportunities for views into the Site from the short section of Shenley Hill which passes the site boundary. These views are mostly from the field access gate at the western end of the boundary with views from the remainder of the road screened or filtered by the roadside vegetation.

- 4.69 From further afield on Shenley Hill, views are prevented by the neighbouring woodland and existing development within Radlett.
- 4.70 Views from Porters Park golf course to the north, are screened by the tree belt which runs alongside the northern edge of Shenley Hill.
- 4.71 There are filtered views of the Site from a short section of footpath no. 55 which passes the northeastern corner of the Site. As the footpath continues in a south easterly direction, through the woodland, views are screened by the intervening vegetation.
- 4.72 Views from Newberries Avenue are limited to glimpses between the properties to the woodland at the eastern Site boundary. There are also intermittent views from the rear gardens and windows of the properties that are served off Newberries Avenue. There are similarly partial views of the Site from Williams Way and Faggotts Close.
- 4.73 Views from Theobald Street to the south are restricted to the woodland in the southern part of the Appeal Site, with heavily filtered views of Newberries Primary School and the interior of the Appeal Site in winter months.
- 4.74 The woodland in the southern part of the Site is visible from public footpath no. 70 which borders the playing fields to the north of Cobden Hill, but the body of the Site is screened from view.

Longer Distance Views

- 4.75 I have not identified any long distance views (over 1km) of the body of the Site, although there may be the occasional opportunity for glimpsed views of the canopies of the trees in the southern part of the Site.

Landscape Value

- 4.76 The reason for refusal does not say that the Site is a Valued Landscape. However, for completeness, I have assessed the Site against the criteria set out in the Guidelines for Landscape and Visual Impact Assessment 3rd edition ('GLVIA) and the supplementary advice issued by the Landscape Institute in 2021 ('TGN 02/21'). The supplementary advice is not intended to provide an exhaustive list and identifies matters that could be considered.
- 4.77 Box 5.1 of the 3rd edition of the GLVIA sets out seven factors that can help in the identification of Valued Landscapes. I have set these out below with my observations beneath. Where appropriate, I have added, in italics, the definitions contained in the additional guidance in TGN 02/21.

Landscape quality (condition) *Landscape condition*

- 4.78 The Site is currently a grass field with an area of woodland in the southwestern part. There is nothing in the way that the Site is managed that elevates its quality above that of ordinary grassland and woodland.
- 4.79 TGN 02/21 states that examples of indicators of landscape value include the 'absence of detracting/incongruous features (or features are present but have little influence)'. In the case of the Site, there are some views of the houses which border the Site which have an influence on its character. The enclosure provided by the neighbouring woodland also results in the Site being detached from the wider countryside which further strengthens its relationship to Radlett.

Scenic quality

- 4.80 The Site does not carry any statutory or non statutory designations for intrinsic landscape quality. It is largely detached from the wider countryside on account of the dense area of woodland that encloses the Site.

Rarity (Distinctiveness)

- 4.81 The Site does not contain any rare elements.

Conservation Interest (Natural heritage and cultural heritage)

- 4.82 The greater part of the Site is not covered by any ecological designations nor is it covered by any heritage designations. The woodland in the southern part of the Site has a non statutory designation for wildlife value. However, the Council are not suggesting that the Appeal Scheme will result in any adverse impacts on this area of woodland.
- 4.83 It is my understanding that the second reason for refusal, which identified the potential risk to archaeological artefacts is no longer being pursued.

Recreation value

- 4.84 There is currently no public access onto or across the Site.

Perceptual aspects

- 4.85 GLVIA refers to perceptual aspects as a landscape which is valued for notable qualities of wildness and/or tranquillity. The Site cannot be described as wild and similarly it cannot be described as tranquil.

Association

- 4.86 As far as I am aware the Site does not have any associations with notable historic figures or historic events.

Function *(This is a new factor identified in GTN 02/21)*

- 4.87 In the TGN 02/21 guidance, the term 'function' covers a range of qualities with the emphasis on 'healthy functioning landscapes'. Examples include hydrological systems, peat bogs, woodlands, oceans and wildflower meadows, amongst other things. It also states that it includes 'landscapes and landscape elements that have strong functional physical or functional links with an adjacent national landscape designation.'
- 4.88 Like all greenfield sites, the Site performs some function e.g. carbon absorption, absorption of rainwater etc. but there is nothing that would elevate its status above that of a typical greenfield site.
- 4.89 Given the above factors, I do not consider the Site to be a Valued Landscape for the purpose of para 174a of the NPPF and the Council have not suggested otherwise.
- 4.90 It is also relevant to note Place Services observations, which stated that: *'..for the purposes of this review we also agree that the Site and its immediate surroundings are not considered to be a valued landscape for the purposes of paragraph 174(a) of the NPPF'*.

5.0 DESCRIPTION OF THE PROPOSED DEVELOPMENT AND SUMMARY OF LANDSCAPE AND VISUAL EFFECTS

- 5.1 The application is in outline form only, save for means of access. Illustrative material has also been provided to show how development *could* come forward on the Site in an appropriate manner. This comprises the DAS, illustrative layout, and parameters plans, amongst other things. CSA has also produced a Landscape Strategy (**Appendix E**) to show the intended approach to the landscaping of the Site and the recreational facilities within it.
- 5.2 The proposed development comprises a mix of market and affordable housing. It also provides community facilities which include land for the expansion of Newberries Primary School and land for a new medical centre. These facilities will be accessible for new and existing residents alike.
- 5.3 The main vehicular access point into the Site will be from Shenley Hill, with a pedestrian, cycle and emergency access link onto Theobold Street.
- 5.4 The woodland in the southern part of the Site is to be kept free of development, save for a narrow emergency access/pedestrian/cycle link which will connect the Site to Theobold Street. Within the Site, the housing has been orientated to face onto the neighbouring woodland and to front onto Shenley Hill. Housing will back onto the properties served off Newberries Avenue.
- 5.5 At the entrance into the Site a local green has been provide which will accommodate a children's play area. There are also areas of informal open space and a trim trail.

Summary of effects

- 5.6 A summary of the anticipated landscape and visual effects of the development is given below. I also provide a commentary on the impact of the development on the Green Belt.

Relationship to Radlett

- 5.7 The Appeal Site has a strong relationship to Radlett, with Newberries Primary School and existing housing extending along the western boundary. There is also housing fronting onto Shenley Hill, immediately to the northwest of the Site.

- 5.8 The housing to the west of the Site does not have a sensitive landscape interface with the Site and wider countryside, in that it does not follow any notable vegetative or topographic features. Rather, it has domestic fencing and intermittent vegetation along its boundary.
- 5.9 The Appeal Scheme would result in the eastern edge of Radlett extending to the woodland which forms the eastern boundary of the Site. This woodland provides a robust and clearly defined boundary to what would be the expanded settlement of Radlett and the proposed development would not be seen from the wider countryside.
- 5.10 The scale and configuration of the proposed development would also be compatible with that in the neighbouring area and would similarly complement the nucleated settlement pattern of Radlett.
- 5.11 The density of the development would be higher than the prevailing density of development in Radlett but land is a finite resource and needs to be developed in a more efficient manner than it has been in the past. A higher density development would also have the benefit of bringing forward a greater range of properties, from starter homes to family housing.
- 5.12 Given that the Site has been planned in an appropriate manner and that it will also provide a range of community facilities then I believe the density and scale of development is entirely appropriate.

Landscape Features

- 5.13 There is no vegetation within the body of the Site that would act as a constraint to development. The vehicular access from Shenley Hill, and the attendant visibility splays, would require the removal of a short section of hedgerow. The emergency access from Theobold Street would also require the removal of several category B and C trees.
- 5.14 Compensatory planting would be carried out throughout the development to make up for any tree and hedgerow loss and a landscape and ecological management plan would be in place to ensure that the new habitats are maintained in an appropriate manner. Overall, there will be a net gain in biodiversity and there has been no objection to the development from Hertfordshire's Ecological Officer or Natural England.

Landscape Character, Value and Sensitivity

- 5.15 As noted in the previous section, the Site is not considered to be a valued landscape for the purpose of the NPPF.

- 5.16 LUC's sensitivity assessment of 2020 concluded that the Site was of low sensitivity to development.
- 5.17 Once again it is helpful to see Place Services consideration of this matter. Their consultation response to the application stated that:
- 'Whilst we do not agree with the methodology and findings [the LVIA], we do generally concur with the judgements of the Site and surroundings as having a 'Medium to Low' landscape sensitivity'.*
- 5.18 The Site falls within the countryside and has a pleasant, open character which has woodland as a backcloth on its eastern boundary. The Site's character is also influenced by its proximity to existing housing which does not have a sensitive interface with the Site and is readily apparent from within it. The containment provided by the neighbouring woodland and lack of intervisibility with the countryside results in the Site having a stronger relationship to the residential area of Radlett than the wider countryside.
- 5.19 Development on the Site will result in a substantial change to the Site's character and that is an inevitable consequence of developing any greenfield site. However, landscape/townscape effects on the wider area will be extremely limited on account of the scale of the proposed development and the enclosure provided by neighbouring woodland. The impact on the wider Green Belt is considered below.

Visual Effects

- 5.20 There will be very few opportunities to view the proposed development from the public domain. The main public viewpoint will be from the entrance to the Site, and its immediate environs, on Shenley Hill. From here there will be views into the Site, along the access road, and of the houses which front onto the road. The view of the frontage housing will be softened by existing and new planting but will not be screened as the development has been planned to read as a natural extension to Radlett and to complement the nature of the existing frontage development immediately to the west of the Site access.
- 5.21 The secondary emergency access from Theobold Street will be visible from the roadside but the alignment of the access and the extent of intervening woodland will mean that development within the Site will not be visible.
- 5.22 From Newberries Avenue and Faggots Close there will be glimpsed views, between existing properties, of the new homes. There will similarly be some opportunities for views from the neighbouring properties and

from Newberries School. There will also be a framed view from the proposed pedestrian access to Willian Way.

Assessment of the Site's performance against Green Belt purposes

- 5.23 I now consider the impact of the development on the Site on the Green Belt.
- 5.24 The Site lies outside of the settlement boundary and within the Metropolitan Green Belt and I acknowledge that it constitutes inappropriate development in the Green Belt as it does not meet the exceptions in para 149 of the NPPF. The very special circumstances that justify development are set out in the Planning Proof of Evidence.
- 5.25 The Site forms a small part of Sub-Area 27, and is identified in the Hertsmere Green Belt Assessment Part 2 as not playing a fundamental role in relation to the wider Green Belt.
- 5.26 I have already referred to the fact that the Draft Local Plan identified the Site (Site R3) as capable of providing around 195 new homes; land to facilitate future expansion of Newberries Primary School; reserve land for the future relocation of Red House surgery; and accessible areas of public open space.
- 5.27 As I have explained in the previous section, the Appeal Scheme makes provision for the housing, open space and community facilities identified in the Draft Local Plan. It will therefore deliver a range of benefits for both new and existing residents alike.
- 5.28 I now provide an assessment of the Site, against the first four purposes of the Green Belt, as set out in paragraph 138 of the NPPF. The 5th purpose of the Green Belt is not considered, on the basis that this purpose is considered to apply equally to all areas within the Green Belt.

To check the unrestricted sprawl of large built-up areas

- 5.29 As set out in the Hertsmere Stage 2 Green Belt Assessment, Radlett is not considered to constitute a distinct large built-up area. Although the Council's studies assess the Site (and wider parcel within which it lies), as making no contribution to this purpose on this basis, it is still worth considering the role it plays in checking the unrestricted sprawl of Radlett.
- 5.30 The Site adjoins the settlement edge of Radlett which forms the western boundary of the Site. To the south and east are significant areas of mature woodland that contain the Site and detach it from the wider countryside/Green Belt. To the north and south are Shenley Hill and

Theobald Street which also provide clearly defined boundaries. The permanent nature of these boundaries would provide a clearly defined and defensible edge to the Green Belt if the Appeal Scheme was to come forward. Overall, the Site is considered to make a negligible/weak contribution to this Green Belt purpose.

To prevent neighbouring towns from merging into one another

- 5.31 The nearest settlements to Radlett are Borehamwood and Shenley and the land which separates these settlements from Radlett falls within the Green Belt.
- 5.32 In considering the function of the Appeal Site in preventing settlements from merging, the Stage 1 Green Belt Assessment makes reference to Planning Advisory Service's (PAS) published guidance for Green Belt Assessment.
- 5.33 Paragraph 3.3 of the Stage 1 Green Belt Assessment references the PAS, and in respect of the Purpose 2: to prevent neighbouring towns from merging into one another, it states that '*.. Landscape character assessment is a useful analytical tool for this type of assessment*'.
- 5.34 In Section 4 of this evidence I have referred to the Outline Landscape Appraisals of Potential Development Sites in Hertsmere, and highlighted that one of the factors the Appraisal took into account, in assessing sensitivity of sites, was: '*how would development on the site affect settlement pattern and separation between settlements*'. As noted previously, that Appraisal concluded that the Appeal Site had a low sensitivity to development.

Borehamwood

- 5.35 When travelling along Theobald Street from Radlett to Borehamwood the distance between the south eastern edge of Radlett and the northern edge of Borehamwood is approximately 1.7 km. With development on the Site in place the gap between the southern edge of the Site and the northern edge of Borehamwood would be approximately 1.4 km. However, the extent of the woodland in the southern part of the Site means that the only element of the development that would come into view from Theobald Street would be the informal pedestrian/cycle/emergency access that leads through the woodland. Given these circumstance, residential development on the Site will not come into view and users of Theobald Street will still experience leaving Radlett at the point at which they pass the frontage housing in Radlett which is immediately to the south east of the Site.

Shenley

- 5.36 When leaving Radlett on Shenley Hill, the physical gap between the village and Shenley is around 1km. The gap between these two settlements would reduce by approximately 100 metres with development in place. This very minor reduction in the gap would only be experienced from the Shenley Hill frontage and its immediate vicinity on account of the alignment of the road and the extensive area of woodland that contains the Site. Once past the woodland one would pass through an area of open countryside and experience a clear break between the settlements with no intervisibility between the two of them.
- 5.37 Given the above factors, the Site is not considered to make any material contribution to Radlett merging with any neighbouring settlement.

To assist in safeguarding the countryside from encroachment

- 5.38 Any development on a greenfield site will result in an element of encroachment. However, the Site's visual relationship with the neighbouring residential area of Radlett and the enclosure provided by the adjacent dense woodland means that the development will not visually encroach into the wider countryside.
- 5.39 It is for these reasons that the Site is considered to make a 'moderate' to 'relatively weak' contribution to this purpose.

Preserve the setting and special character of historic towns.

- 5.40 The reason for refusal does not say that the Appeal Scheme will give rise to any harm to the Conservation Areas of Radlett, but for completeness I have considered the relationship of the Appeal Site to the Conservation Areas.
- 5.41 Radlett has two Conservation Areas which lie at the heart of the village. There is no relationship between these two areas and the Appeal Site on account of the intervening suburban development.
- 5.42 The Stage 1 Hertsmere Green Belt Assessment identified Radlett as an 'Historic Town' for the purposes of assessing Purpose 4 (see section 4.3.4 of Stage 1 Hertsmere Green Belt report). However, when assessing the strategic parcel and sub-area which the Site was identified as lying within, the Council's assessment found that they did not meet this purpose.
- 5.43 Given the lack of intervisibility between the historic core of Radlett and the Site, development on the Site would not result in any harm to the historic setting of Radlett.

Openness

- 5.44 Openness has both a spatial and visual component. In terms of the spatial impact, development on the Site would inevitably result in a reduction in the physical openness of part of the Green Belt that the Appeal Site occupies. Effects on the openness of the wider Green Belt would be minimal due to the visual containment of the Site and its relationship to the edge of Radlett.

Overall Conclusion on Green Belt

- 5.45 It is unusual to find a Green Belt Site, on the edge of a sustainable settlement, that has such robust and defensible boundaries and where there are virtually no opportunities for views of it from the neighbouring countryside/Green Belt.
- 5.46 It is unsurprising that the Site was a draft allocation, given that the background studies commissioned by Hertsmere consistently identified the Site as an appropriate candidate for release from the Green Belt. The Stage 2 Green Belt Assessment stated that '*... the removal of the sub-area is unlikely to impact the performance of the wider strategic Green Belt.*'
- 5.47 From my observation on Site, from reviewing the evidence base that informed the allocation in the draft Local Plan, and from considering the nature and scale of the Appeal Scheme, I believe that there will be a negligible adverse impact on the performance of the wider Green Belt if the Site is released for development.

6.0 RESPONSE TO REASON FOR REFUSAL AND OBSERVATIONS OF THE PARISH COUNCIL AND RADLETT SOCIETY AND GREEN BELT ASSOCIATION.

6.1 In the previous section I have addressed the impact of the Appeal Scheme on the Green Belt and also considered the anticipated landscape and visual effects. The following section is therefore only a brief response to the reason for refusal.

6.2 I have already referred to the fact that the first reason for refusal is concerned with Green Belt matters and does not allege landscape harm. Nevertheless, development on any greenfield site will give rise to a certain level of harm, albeit in this instance the harm is strictly localised. As this will need considering in the planning balance it is relevant to refer para 7.4.8 of the RTC.

*'To conclude, **we are of the judgement that the proposed scheme will have an adverse impact on both landscape character and visual amenity.** Whilst this harm is not considered substantial from a landscape perspective....'*

6.3 The Case Officer has highlighted the fact that the scheme would have an adverse effect on landscape character and visual amenity but has not highlighted the fact that the *'harm is not considered substantial'*. This is clearly of relevance in the planning balance and accords with my own assessment.

6.4 Paragraph 7.4.2 of the RTC quite rightly recognised that the level of Green Belt harm would be affected by the level of visibility. The paragraph stated that:

'While it is true that development on a previously undeveloped Green Belt site will always, by definition, be harmful, that harm may be lesser or greater depending on whether a particular site is readily visible, and depending on whether there are sensitive receptors nearby: such as vantage points from which the public may look over the site' [my emphasis].

6.5 Paragraph 7.4.3 of the RTC goes on to say that:

'While this site is well screened by woodland from Theobald Street, long views southwards down its whole length can be enjoyed from Shenley Hill. That street is on higher ground. The road has a footway on this which leads to the start of Public Footpath 55 at the north-eastern corner of the site. From the footway of Shenley Hill members

of the public can look southwards down the whole length of the site: either through the gate or (especially in winter) through gaps in the hedge...'

- 6.6 It is relevant to note that only a single viewpoint has been identified in the RTC and that views are restricted to a small section on the Site frontage. Given the extremely limited opportunities for views into the Site from the public realm then it is fair to conclude that the Green Belt harm would be strictly limited as the Site is not 'readily visible' from the public domain.

Conflict with paragraphs 11, 149 and 150 of the NPPF

- 6.7 The SOCG acknowledges that the Appeal Scheme does not fall within the categories of development identified in paragraph 149 and 150 of the NPPF. The weight that should be applied to these policies is addressed in the Planning Evidence. The potential conflict with paragraph 11 is also addressed in the Planning Evidence.
- 6.8 The Planning Evidence also addresses Policies SP1 and SP2 of the Core Strategy.

Policy CS13 Green Belt

- 6.9 Policy CS13 of the Core Strategy states that there is a general presumption against inappropriate development within the Green Belt unless very special circumstances exist. This policy has been addressed in the previous section of this evidence.

Policy SADM 26 Development Standard in the Green Belt

- 6.10 Policy SADM 26 is linked to Policy CS13 and sets out the development standards for the types of development that are considered appropriate in the Green Belt. The policy covers aspects such as the need to respect existing vegetation, minimise the visual impact, be of an appropriate scale etc.
- 6.11 I have already acknowledged that the Appeal Scheme does not fall within the categories of development identified in para 149 and 150 of the NPPF but it has nevertheless been configured in such a manner as to bring forward a development that respects its Site and surroundings and one that will be visually unobtrusive.

Aldenham Parish Council and Radlett Society

- 6.12 The majority of the comments made by the Parish Council and Radlett Society have already been addressed in this evidence or are addressed

in the evidence of the other witnesses. The following section therefore only provides a summary response to other landscape or Green Belt matters raised.

Adverse Impact on countryside setting of Watling Chase Community Forest (CD4.28)

- 6.13 The Watling Chase Community Forest covers an area of approximately 18,840 hectares (72 square miles) of land in Hertfordshire and the northern fringe of London, which includes several sizeable settlements but is predominantly rural. It includes large settlements such as Potters Bar and Borehamwood.
- 6.14 The Watling Chase Document dates back to 2003 and is described as '*guide to landowners, developers and users*'.
- 6.15 Paragraph 4.3 of the document states that '*The Forest Plan is a non-statutory document and as such, none of its policies, strategies or proposals override statutory development plans*'.
- 6.16 The Community Forest does not seek to prevent development within the identified area, which is unsurprising given the fact that it includes major settlements; infrastructure; recreational land and farmland.
- 6.17 As I have already explained, the masterplan for the Site has been configured in such a manner as to retain the vast majority of vegetation within the Site. It also makes provision for new areas of planting and recreational open space. BNG will also be achieved and a Landscape and Ecology Management Plan will be conditioned to ensure that, new and existing vegetation will be managed in an appropriate manner.
- 6.18 Given the above factors, the development clearly respects the existing landscape and ecological habitats within the Site. Against that background it is also relevant to note that there is no objection to the application from the Council on ecological or arboricultural grounds.

Reduction in open countryside between Radlett, Shenley and Borehamwood.

- 6.19 In the previous section I have addressed the impact of the development on the separation between Radlett and Shenley and Boreham Wood and concluded that the effect would be negligible and only experienced from within the immediate environs of the Site.

No direct integration of the Site into Radlett

- 6.20 The proposed development will integrate with Radlett in both a social sense and physical sense.
- 6.21 In terms of shared social facilities, the development will provide a doctors surgery, expansion for Newberries Primary School, affordable housing and recreational open space, amongst other things.
- 6.22 Physical connections will be provided by a footpath link to Williams Way with pedestrian and cycle links to Theobold Street and Shenley Hill.

Average density of development in Radlett is 11 dph as opposed to the Appeal Scheme which is 36 dph.

- 6.23 Land is a finite resource and we cannot continue to develop at the density we have done in the past. There are also social and financial implications, in that it would not be viable to deliver a range of properties from starter to homes to family homes at such a low density.

Conclusion on Green Belt Impact

- 6.24 As set out above, I acknowledge that there will be some conflict with the purpose of protecting the Green Belt from encroachment but given the highly contained nature of the Site, and the scale of the proposed development, the visual and spatial impact will be strictly limited and localised.

7.0 CONCLUSION

- 7.1 The Appeal Scheme will deliver a development that provides a range of market and affordable housing, together with community and recreational facilities. There will also be landscape enhancements, recreational facilities and BNG.
- 7.2 The scale and configuration of the development responds to the landscape features within, and on the boundaries of the Site, in an appropriate manner. The development will similarly complement the prevailing pattern of development in Radlett.
- 7.3 From my observations on Site and from reviewing the evidence base that informed the allocation in the draft Local Plan, and from considering the nature and scale of the Appeal Scheme, I believe that there will be a negligible adverse impact on the character of the wider landscape and performance of the wider Green Belt if the Site is released for development.



Dixies Barns, High Street, Ashwell,
Hertfordshire SG7 5NT

t 01462 743647

e ashwell@csaenvironmental.co.uk

w csaenvironmental.co.uk

Suite 1, Deer Park Business Centre, Eckington,
Persore, Worcestershire WR10 3DN

t 01386 751100

e persore@csaenvironmental.co.uk

w csaenvironmental.co.uk

Gallery 1, Citibase, 95 Ditchling Road,
Brighton BN1 4ST

t 01273 573871

e brighton@csaenvironmental.co.uk

w csaenvironmental.co.uk