



**TOWN & COUNTRY PLANNING ACT 1990 SECTION 78
TOWN & COUNTRY PLANNING (INQUIRIES PROCEDURE)
(ENGLAND) RULES 2000 (AS AMENDED)**

**PINS ref APP/N1920/W/23/330599
LPA ref: 22/1539/OUT**

Appeal by

Fairfax Acquisitions Ltd

in relation to

**LAND SOUTH OF SHENLEY HILL, RADLETT,
HERTFORDSHIRE**

**PROOF OF EVIDENCE ON GREEN BELT
OPENNESS AND LANDSCAPE/VISUAL
MATTERS**

prepared by

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on behalf of

Hertsmere Borough Council

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1. Introduction

1.1 My name is Peter Radmall. I have an M.A. in Geography from the University of Oxford and a B.Phil. in Landscape Design from the University of Newcastle-upon-Tyne. I am a Chartered Landscape Architect and have around 35 years of professional experience.

1.2 I have worked for several design and planning practices, and have taught at a graduate and post-graduate level. I have been an independent practitioner for the last 25 years. One of my principal areas of expertise is landscape and visual impact assessment. I have carried out such assessments for a wide range of projects, and have acted as an expert witness on numerous occasions.

1.3 I was instructed in June 2023 by Hertsmere Borough Council to prepare this proof of evidence in relation to the appeal. I am familiar with the local area, having been involved with previous appeals for Green Belt sites within the borough. This evidence represents my true and professional opinion.

1.4 I have visited the vicinity of the appeal site and have consulted the relevant sources of information. In addition to the NPPF, Local Plan and Committee Report, I shall be referring to the following documents:

- Hertsmere Green Belt Assessment Stage 2 (Arup, March 2019, CD4.27);
- Hertsmere Landscape Sensitivity Study (LUC, September 2020, CD4.25);
- Hertsmere Outline Landscape Appraisals (LUC, October 2020, CD4.30);
- Hertfordshire Landscape Character Assessment (LCA, CD4.31), pp95-98;
- Landscape and Visual Impact Assessment (LVIA, CSA, August 2022, CD1.4);
- Green Belt Review (CSA, August 2022, CD1.5);
- Parameters Plan (Paul Hewett drwg 2213/PL.03, CD1.11);
- Landscape Strategy (CSA drwg 4964/104, CD1.3);
- Arboricultural Report (Arbortrack, December 2022, CD1.28);
- Biodiversity Impact Calculation (Ecology Co-op, Dec 2022, CD1.19);
- Guidelines for LVIA (LI/IEMA, CD 4.32); and
- Appeal Decision APP/C1950/W/22/3307844: Land North of Bradmore Way, Brookmans Park (CD 5.24).

2. Scope of this Evidence

- 2.1 The proposed development relates to Land South of Shenley Hill, Radlett, and is described as follows:

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).

- 2.2 The application was refused on 2nd March, 2023 for three reasons. This evidence relates to Reason 01, which is as follows:

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).

- 2.3 My evidence addresses the "significant harm" to the openness of the Green Belt that would arise from the proposed development. This harm would be perceived visually, and would be caused by a fundamental change to the character of the site. Consequently, I address the implications this change would have for the character and appearance of the area, notably due to the physical and perceived encroachment into countryside. This also engages Green Belt purpose (c): "to assist

in safeguarding the countryside from encroachment” [NPPF 138], together with policy intended to protect that countryside.

- 2.4 This evidence therefore adopts a broad interpretation of openness to include its landscape and visual aspects. Even though these are not explicitly referred to in the Reason, they clearly influenced the Council’s decision. This is evident from paragraph 7.20.3 of the Committee Report, which is as follows:

The proposed development would be an inappropriate development in the Green Belt, which would cause harm in principle. It would be contrary to the adopted Local Plan, in particular policies SP1, CS1, CS2, CS13, SADM3 and SADM22. As this is previously undeveloped, open land in the countryside, the proposed development would, by definition, be harmful to the Green Belt and its openness. The Council’s Landscape Adviser has concluded that the harm would not be “substantial” in landscape terms, but that some harm would arise. In particular it is noted that, besides the definitional harm, there would be harm to views southwards down the length of the site from public vantage points on Shenley Hill.

- 2.5 In preparing this evidence, I have used the appellant’s Green Belt Review and LVIA as my starting-point, augmented by assessment work of my own sufficient to confirm whether or not I agree with these documents. In order to aid comparison, I have adopted the terminology used in the LVIA to describe the effects of the development.

- 2.6 The planning matters raised in Reason 01, in particular whether the test of “very special circumstances” is satisfied, together with the status of relevant policies and the planning balance, are addressed in the evidence of Ms Stafford.

3. The Nature of Openness

- 3.1 In view of the core role of openness in the Council's Reason, I wish to make a few preliminary observations about its meaning and its relationship both to the purpose of the Green Belt and to landscape/visual considerations.
- 3.2 Together with permanence, openness is one of the "essential characteristics" of the Green Belt [NPPF137]. Whilst it is not defined – for example, in the Planning Portal glossary - development that involves "*the construction of new buildings*" in the Green Belt is regarded as "inappropriate", due to the loss of openness (NPPF149). Openness can therefore be defined, for the purpose of protecting the Green Belt, as "an absence of built development".
- 3.3 It is a relative concept, since few parts of the Green Belt are entirely devoid of buildings. As a designation, Green Belt typically "washes over" small settlements and individual buildings, where these do not compromise its overall characteristic of openness. In the vicinity of the site, for example, the Green Belt includes Newberries Primary School, which adjoins its western boundary; and the property known as "Buckfield", which adjoins the site to the south-east.
- 3.4 NPPF149 goes on to advise that built development can be appropriate within the Green Belt, provided that it:
- is limited;
 - relates to (infills, replaces or extends) existing built development; and/or
 - is ancillary to uses that maintain a predominance of openness.
- 3.5 Whilst the openness of the Green Belt is primarily a land-use - as opposed to landscape - concept, it is of course perceived visually. It therefore influences the degree of visibility within an area, and the character of the relevant views. In simple terms, as an area becomes more built-up, visibility tends to become restricted, and the views that remain become more enclosed and urban in character.
- 3.6 Openness therefore has both a spatial dimension (i.e. whether land is devoid of buildings) and a visual dimension (i.e. how readily this openness can be perceived). This is confirmed by the Planning Practice Guidance [Paragraph 001, Ref ID:64-001-20190722], which states that: "*openness is capable of having both spatial and visual*

aspects – in other words, the visual impact of the proposal may be relevant, as could its volume”.

- 3.7 The relationship between these two forms of openness is not always straightforward. This is demonstrated in the vicinity of the appeal site, which is adjoined to the east by established woodlands. These maintain a strong sense of enclosure along the site perimeter, whilst remaining “open” in Green Belt terms.
- 3.8 Openness is also a fundamental attribute of the countryside – as reflected in use of the term “open countryside” – and relates both to the relative absence of buildings and the preponderance of land uses that typically maintain its visual openness. The introduction of built development has implications for openness in both these senses, as well as for the character of an area in terms of the relationship between urban and rural influences.
- 3.9 This provides another cross-over between landscape character and Green Belt policy, for the five purposes of the Green Belt include: “(c) *to assist in safeguarding the countryside from encroachment*” [NPPF 138]. It is clear from the context in which this is used that the intended meaning is to safeguard the countryside from encroachment by urban development, which invariably results in the loss both of rural characteristics and of the open views in which they can be appreciated.
- 3.10 Landscape planning in England is based on a hierarchy of published character assessments. The positive characteristics identified in these assessments largely reflect the mosaic of land-uses, historical and bio-physical factors that can be fully appreciated only within the countryside. The protection of that countryside is therefore critical to maintaining both the openness of the Green Belt, and the character and appearance of the “local environment” that is the explicit frame of reference set by NPPF174.

4. Character and Role of the Site

Intrinsic Character of the Site

4.1 The site is described in LVIA Section 4.0 and is shown in LVIA photoviews 7-13 [LVIA Appendix C]. An aerial view is shown in **Figure 4.1** below. Its main characteristics may be summarized as follows:

- i. Most of it comprises a single, elongated field under pasture (modified or neutral grassland), with no internal sub-divisions;
- ii. The southern part, forming the frontage to Theobald Street, comprises deciduous woodland (which is “ancient woodland” and part of the Theobald Wood Local Wildlife Site);
- iii. It is gently sloping, with a fall in elevation of c10m from north-west to south-east;
- iv. Whilst there is currently no evidence that it is actively managed (e.g. grazed or mown¹), it appears to be in agricultural use² and is not obviously degraded (apart from some peripheral encroachment by scrub);
- v. It is in a wholly greenfield condition, with no buildings or obvious hardstanding; and
- vi. There is no evidence that it has ever contained any built development, except for small farm buildings or similar located close to the Shenley Road frontage, as shown on historic mapping.

4.2 The site boundary is adjoined as follows:

- i. 23% by highways (Shenley Hill and Theobald Street);
- ii. 27% by the defined settlement edge;

¹ Although the LVIA views suggest that it may previously have been mown.

² Which is confirmed in the DAS.

- iii. increasing to 47% for total built curtilage when the primary school and the isolated property of Buckfield (which adjoins the site to the south-east) are added; and
- iv. 30% by woodland (Newberries Wood).

Figure 4.1: Appeal Site



4.3 The following conclusions can be drawn:

- i. The site clearly forms a parcel of countryside;
- ii. It appears to be in agricultural use and in reasonable condition;
- iii. It is wholly open in Green Belt terms;
- iv. It is largely open in visual terms (except for the woodland adjoining Theobald Street and a sense of enclosure created by its vegetated boundaries);
- v. The settlement edge defines less than a third of its boundary;

- vi. The proportion of its boundary defined by the curtilage of built development increases to just under half when Buckfield and the primary school are added;
- vii. Woodland adjoins a greater proportion of its boundary than the settlement edge; and
- viii. Land uses that maintain Green Belt openness (highways and woodland) define more than half of its boundary³.

Relationship to Surrounding Area

4.4 The site's physical and visual relationship to its surroundings may be summarized as follows (with reference to the views in LVIA Appendix C):

- i. Whilst the settlement edge forms less than a third of its boundary, the visual influence of the built-up area extends across most of the site. This is due both to the openness of the site and to the proximity and scale of properties in Newberries Avenue, Williams Way and (to a lesser extent) Shenley Hill (LVIA views 7, 8, 9, 11), despite the screening effects of vegetation within gardens and along the site perimeter. The contrast between the greenfield and open character of the site and the adjoining built-up area is readily apparent.
- ii. Vegetation also substantially screens views of the primary school, even in winter (LVIA view 10). The school site lies within the Green Belt and retains a predominantly greenfield character (ref Figure 1), whilst the school buildings are not especially conspicuous in views from the surrounding area. It therefore contributes overall to the spatial and perceived openness of the Green Belt.
- iii. The woodland defining the eastern boundary amounts to slightly more of the site perimeter than the settlement edge. It is equally influential visually, creating a dramatic contrast with the openness of the site, particularly where

³ Note that the primary school also lies within the Green Belt, and that LVIA drwg CSA/2964/103: Designations and Local Policy Plan (LVIA Appendix D] is incorrect in showing it as excluded.

conifers predominate, and forms a backcloth in views from the west (LVIA views 11, 12, 13). The extent and density of this woodland is such as to rapidly preclude inter-visibility between the site and the wider area to the east.

- iv. Seen from within the site, the vegetated frontage to Shenley Hill assimilates into the wooded context created by Newberries Wood, the periphery of Porters Park golf course (beyond the road) and the vegetated character of the western boundary (LVIA views 11, 12). This context also obstructs inter-visibility between the site and the wider area to the north.
- v. A similar effect is achieved by the woodland defining the southern boundary of the site, which is seen in association with the woodland edge to the east and the vegetation defining the curtilage of the primary school to the west (LVIA views 7, 8, 9, 13). From within the site, the role of this woodland is reinforced by a parallel tree-belt beyond Theobald Street, and by the downward-sloping terrain of the Tykes Water valley, which limits inter-visibility between the site and the wider area to the south.

4.5 The key conclusions to be drawn from this analysis are as follows:

- i. The open and greenfield character of the site provides a dramatic contrast in character along the settlement edge.
- ii. Whilst the site is visually open, the built-up area and surrounding tree cover provide a substantial degree of visual separation from the wider area.
- iii. Although the settlement edge exerts a significant influence as part of the immediate setting of the site, it does not alter the site's intrinsic character, which remains that of a parcel of countryside.
- iv. Despite its visibility, the built-up area forms a relatively small proportion of that setting (as defined by the percentage of the site boundary it adjoins).
- v. The majority of the site's immediate setting comprises the woodland to the east and the site's vegetated perimeter (with further tree cover and open land beyond) to the north and south.

- vi. The majority of its setting therefore comprises land and features (tree cover) that reinforce its role as part of the countryside.
- vii. The majority of its setting also falls within the Green Belt, and meets the test of spatial openness (even if much of it is not visually open).

Visual Context

4.6 The visual context of the site is described in LVIA Section 4.0, supported by the viewpoint plans and photoviews. My own fieldwork confirms that the LVIA accurately describes the visual influence of the site, and provides a representative sample of views. I shall therefore simply summarize the viewing opportunities (with reference to the relevant LVIA views) as follows:

- i. Views from Shenley Hill adjacent to/approaching the northern boundary: The vegetated frontage of the site is prominent, through which there are views to the open grassland beyond (relatively unobstructed in winter, but glimpsed in summer). The countryside character of the site is evident, contributing to the otherwise wooded setting of this approach to Radlett. The site frontage is clearly perceived as being located “outside” the Radlett signboard (LVIA views 2-5).
- ii. Views from the western end of public footpath 55 approaching the road through Newberries Wood: Framed views between trees, to the open grassland beyond, which helps to maintain the rural setting of this PRow (even though glimpses of dwellings introduce a sense of approaching the settlement) (LVIA view 6).
- iii. Views from nearby residential streets within Radlett: Views towards the site from a suburban context. Whilst its grassland cover is not visible, its open and undeveloped condition is perceptible, with the woodland edge forming a backdrop in the middle distance (LVIA views 1, 14).
- iv. Views from nearby residential properties (mainly in Newberries Avenue, Williams Way and Shenley Hill), and the primary school. Actual views will vary significantly, depending on orientation and the degree of screening

provided by vegetation within gardens and around the site perimeter. It is likely that a proportion of these views include the grassland cover of the site, with the surrounding woodlands forming a prominent backdrop.

- v. Views from Theobald Street: Sequence of unobstructed views of wooded site perimeter, with no sense of the open grassland beyond. These views reinforce the substantially wooded and rural character of this approach to Radlett. The site frontage is clearly perceived as being located “outside” the Radlett signboard (LVIA views 15.16) and to form part of the linear ancient woodland that extends further east along the road.
- vi. Views from southern side of Tykes Water valley: Relatively few publicly accessible locations, but where open views are gained (e.g. from the rugby club, LVIA view 17), Theobald Wood forms part of the wooded skyline that is characteristic of the valley. There are no views towards the open interior of the site, even in winter.

4.7 The visual influence of the site (as determined from publicly-accessible locations) is limited, due to the screening provided by the built-up area and surrounding woodlands. Where the site is visible, its open grassland and tree cover contribute to the character of the countryside of which it forms part, helping to offset the intrusive influence of the built-up area.

4.8 Even where the site’s grassland cover may not be visible (as from nearby residential streets), the site maintains a perception of being open and undeveloped, providing views across it to the woodlands. The site is clearly perceived to pass the test of Green Belt openness, either explicitly where its greenfield cover is visible, or implicitly due to its absence of built development.

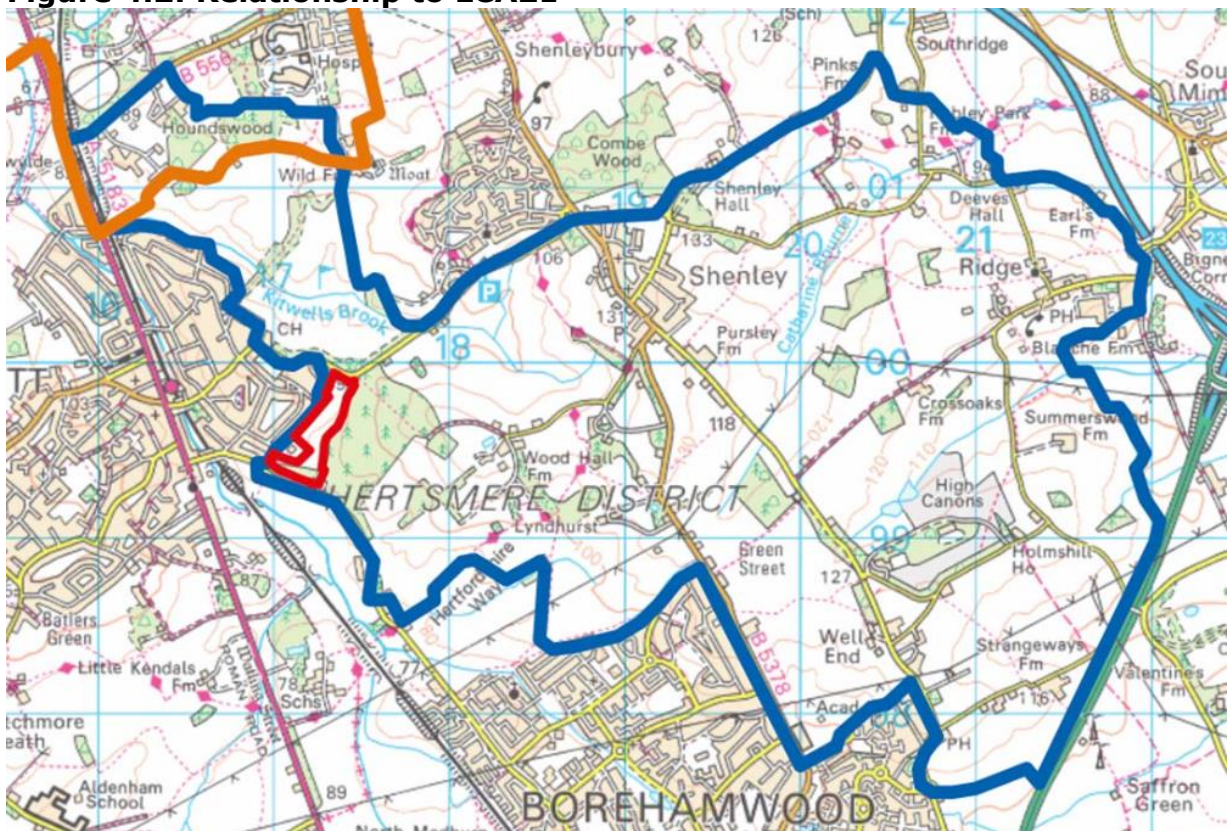
4.9 The site generally retains an attractive appearance that contributes to the amenity of local views and reinforces local character, particularly in relation to the countryside setting of Radlett, including two of its rural approaches. These approaches (along Shenley Hill and Theobald Street) help to maintain the continued perception of the town’s separation from Shenley (to the north-east) and Borehamwood (to the south-east). The hinterland of countryside through which

one approaches Radlett from these directions suggests that this part of the Green Belt has served its purpose well.

Relationship to Published Landscape Character

4.10 The Hertfordshire Landscape Character Assessment (Herts LCA) locates the site within Character Area 21: High Canons Valleys and Ridges (see **Figure 4.2** below. The site is located on the western periphery of the character area, adjoined to the west by the built-up area.

Figure 4.2: Relationship to LCA21



4.11 The key characteristics of LCA21 are set out in **Table 4.1** below, with a comment on the degree (high/medium/low) to which I consider the site and surrounding area to be representative of them. NE indicates that a characteristic is not evident.

Table 4.1: Representativeness of LCA Characteristics

Key Characteristic	Degree of Representativeness
Series of narrow settled ridges of sinuous form	NE within site. Low for surrounding area as the rising ground to the east is characterised by scattered rural settlement and forms part of the Shenley ridge.

Slopes to the south east comprise mainly medium to large arable fields and more open character.	NE re arable land-use, although the site and surrounding uses (e.g. golf course) do retain a degree of openness.
Slopes to the west and north east comprise a more intact landscape of small/medium pasture and numerous field oaks.	Medium for site, which has the appearance of a medium-scale pasture, with a reasonably intact structure, but no field oaks. NE for surrounding area except for the golf course, which retains a pastoral appearance. Whilst there are no field oaks within the site, mature oaks remain on its western boundary and within the school grounds
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.	High for site and surrounding area, due to the prevalence of woodland belts and plantations associated with the former Newberries and Porter's Park estates. Prominent mature conifers within the built-up area are also a remnant of a former parkland landscape.
Prominent built edge to Borehamwood and associated pylons dilute the rural character	NE re Borehamwood, but High for the site, due to the prominent settlement edge of Radlett. This prominence falls away rapidly across the surrounding area, to become NE. Pylons are not prominent in the immediate vicinity of the site.
Good range and use of local building materials	NE within site, and generally Low within surrounding area, where most built development dates from post-1860 and particularly mid 20thC and therefore tends to use more generic materials.

4.12 Of the six characteristics:

- i. three are not evident within the site and/or are slightly evident in the surrounding area;
- ii. two are highly evident within the site (its pastoral character/intact structure and the prominent settlement edge), but less so in the surrounding area; and
- iii. one is highly evident within the site and surrounding area (tree belts and plantations).

4.13 In view of the site's peripheral location, and the substantial variations in character within LCA21, the site would not be expected to be highly representative of all characteristics. However, those characteristics that are evident give the site a distinctive sense of place that reflects its predominantly open and pastoral

appearance, its partly wooded character and vegetated boundaries, and its visual relationship to the adjoining woodland and settlement edge.

5. Site and Landscape Sensitivity

5.1 The tabular summary of landscape effects in LVIA Appendix L identifies the following receptors:

- Within the site: woodland, individual trees, hedgerow and grassland;
- The overall site; and
- The surrounding area, distinguishing between the countryside and the built-up area.

5.2 Whilst the surrounding countryside includes a proportion of LCA21, the LVIA does not consider the overall character area as a separate receptor, which I propose to do.

5.3 As set out in GLVIA3, landscape sensitivity is derived from a combination of value and susceptibility. Although the LVIA reports the sensitivity of the above receptors, it is not entirely clear how this has been derived, since it does not identify their susceptibility. In this section, I carry out my own assessment of value, susceptibility and sensitivity, and then compare this to the findings of the LVIA. In order to assist comparison, I have adopted the same terminology as the LVIA.

Value

5.4 It is common ground that the site does not lie within any landscape designation, although the woodland on its southern part is included within a Local Wildlife Site. Neither is the site publicly accessible, since there are no PRoWs within it (and I have seen no evidence that access may be gained to it unofficially). Its contribution to the amenity of public views is mainly confined to its wooded frontage to Theobald Street and its vegetated perimeter along Shenley Hill. The woodland on the southern part of the site also contributes to the wooded skyline characteristic of longer-distance views across the Tyles Water valley from the south.

5.5 The open, pastoral appearance of the interior of the site provides a welcome contrast to this wooded context when visible (as from Shenley Hill), and is assumed to be appreciated in a substantial number of private views from the settlement edge.

Even when its grassland cover cannot be seen, the site retains a perception of openness and an absence of development.

- 5.6 The LVIA describes the site as possessing “...a generally pleasant landscape character and the woodland forms an attractive backdrop” [LVIA 4.21]. However, it then states that “...the Site is not notably scenic given its proximity to the existing settlement edge” [LVIA 4.22]. As discussed previously, the settlement edge exerts a significant visual influence across most of the site. However, the open, pastoral (and partly wooded) character of the site provides a demonstrable contrast that helps to define the settlement edge and contributes to the amenity of local views. Within this very local frame of reference, the site therefore retains a degree of scenic value, partly because of its proximity to and inter-visibility with the settlement edge.
- 5.7 The LVIA considers the site to be of “medium” value overall, and the southern woodland to be of “medium to high” value because of its wildlife interest and contribution to local character [LVIA 4.22]. I agree with this evaluation, and also with the conclusion that the site does not amount to a “valued landscape” for the purposes of NPPF 174. It is noted, however, that the LVIA concludes that the southern woodland “would be valued at a local level” [LVIA 4.22].
- 5.8 I consider the overall value of the surrounding countryside and townscape to be medium, taking account of variations from low (for ordinary countryside and 20thC suburban development) to high (for designated areas such as Local Wildlife Sites and Conservation Areas), and that the same evaluation (Medium) applies to LCA21.

Susceptibility

- 5.9 Susceptibility refers to “the ability of the landscape receptor...to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies” [GLVIA3 5.40]. “Undue consequences” are not defined, but it would be reasonable to take these to mean a harmful change to the baseline sufficient to conflict with relevant policies and strategies. The question of policy compliance is usually addressed at the conclusion of the assessment process, so I will focus here on the matter of baseline change.

5.10 My assessment of the susceptibility of the identified receptors is as follows (with explanation):

- Woodland and trees within site: High for the woodland and mature trees (where felling or clearance may be required), medium where these would be retained;
- Hedgerow within site: Medium, since removal would be partial and opportunities for re-planting/enhancement can be provided;
- Grassland within site: High, since this largely cannot be retained with the quantum and type of development proposed;
- Overall site: Medium to high (reflecting the above);
- Surrounding countryside: Medium to high overall (extrapolating from the site);
- Built-up area: Low, due to its similarity in character to the proposed development and its limited inter-visibility with the site; and
- LCA21: Medium overall, reflecting variations from low for the built-up area of Shenley to medium/high for most of its countryside.

Conclusion on Sensitivity

5.11 Reflecting the above, I consider the sensitivity of the landscape receptors to be as follows (with the LVIA conclusion provided for comparison):

- Woodland and trees within site: Medium to High (same as for LVIA);
- Hedgerow within site: Medium (compares to Low in LVIA);
- Grassland within site: High (compares to Medium in LVIA);
- Overall site: Medium to High (compares to Medium to Low in LVIA);
- Surrounding countryside: Medium (same as for LVIA);

- Built-up area: Low to Medium (compares to Medium in LVIA); and
- LCA21: Medium (not explicitly assessed in LVIA, but probably similar (extrapolating from its assessment of the surrounding area)).

5.12 In summary, I consider the LVIA to have under-stated the sensitivity of all landscape receptors except for woodland and trees within the site and the surrounding built-up area and countryside. The greatest difference between us relates to the site and the grassland within it, which amounts to one order of magnitude. I comment on these differences below.

5.13 There is no clear justification for the reduction in the sensitivity of the site as reported in the LVIA. Only one of the receptors within the site is reported to be of low sensitivity (hedgerows), and this is not a major influence on its character. The LVIA seems to have been influenced by the Outline Landscape Appraisal (OLA) presented in LVIA Appendix J, which concludes that Site 14 is of Low sensitivity. Site 14, however, does not correspond to the whole appeal site, and excludes its wooded (and most valued) southern part (ref site boundary on page LUC161).

5.14 As reported in OLA Table 2.14, the Sensitivity Assessment concludes that both LCA21 and the Radlett Fringe sensitivity assessment unit are of Moderate sensitivity. Despite the difference in terminology, this is consistent with the Medium sensitivity I find for the LCA and the countryside context of the site. Sensitivity would be expected to vary as the frame of reference decreases. OLA Table 2.14 refers to two factors that are considered to reduce the sensitivity of Site 14: its "*location on the urban edge*" and "*the enclosure provided by existing woodland*". Whilst these are both valid considerations, which the LVIA has picked up on, two qualifications should be made:

- Whilst the site physically adjoins the settlement edge, and is substantially inter-visible with it, this relationship affects the immediate setting of the site, i.e its contextual character - not its intrinsic character or sensitivity. I therefore disagree with the statement in the LVIA that "*...its character is influenced by its proximity to existing housing*" [LVIA 5.19], if this refers to the intrinsic character of the site.

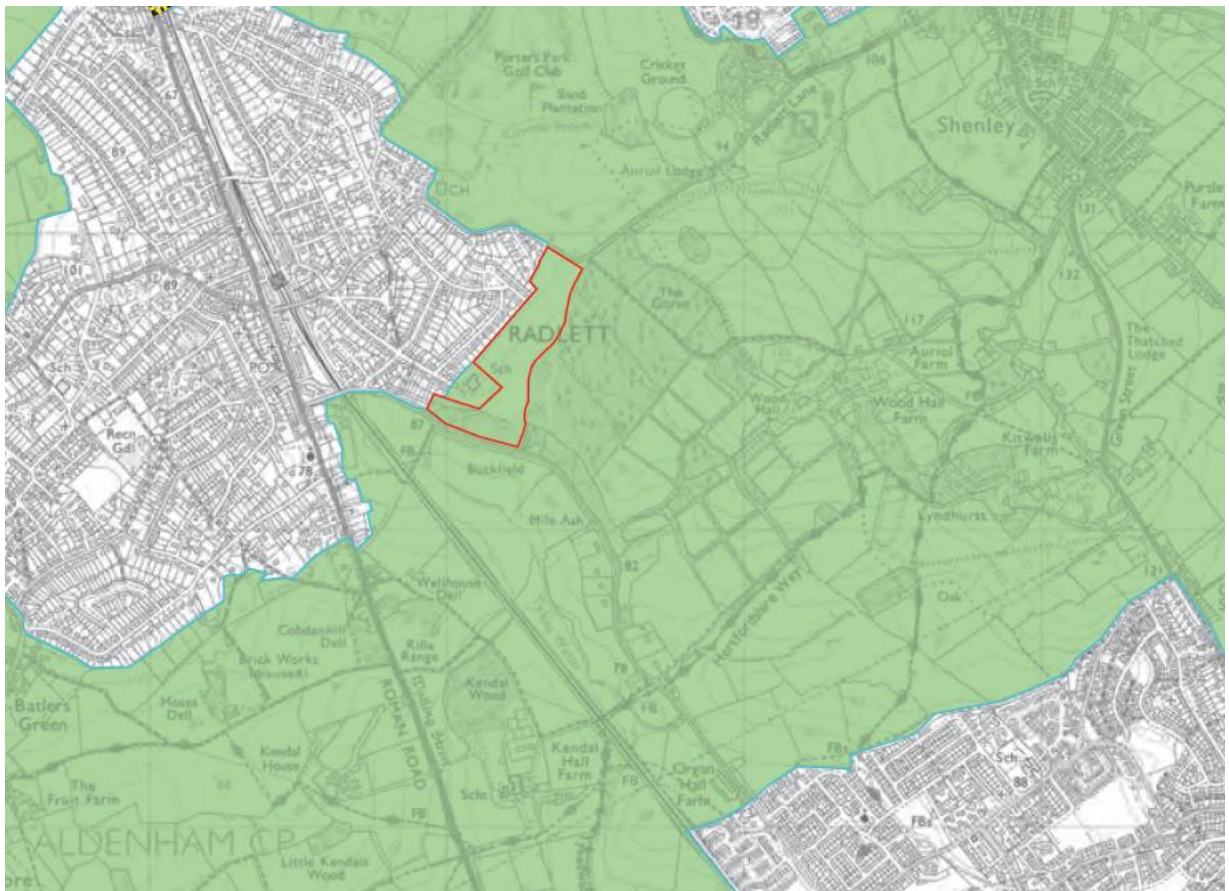
- ii. In addition, to accept the premise that proximity/inter-visibility with the settlement edge automatically downgrades the sensitivity of the adjoining countryside, raises a serious question in landscape planning terms. This approach has the potential to create a “bow-wave” of de-sensitized countryside adjacent to the settlement edge, in which it could thereby become increasingly difficult to resist the urban encroachment that is the primary objective of Green Belt purpose (c).
- iii. If the influence of the settlement edge on the intrinsic character of the site is accepted, then the equal – if not greater - visual influence of the woodland to the east must also be accepted, which is not acknowledged in the LVIA.
- iv. Finally, whilst I acknowledge that the limited visibility of the site is an important influence on its suitability for development, this affects its visual sensitivity (i.e. the spatial extent of any associated impact) rather than its intrinsic character and sensitivity, which is the focus of this section.

5.15 To summarize, whilst I find a degree of common ground with the LVIA, I consider its downgrading of site sensitivity to be unsubstantiated.

6. Relationship to Green Belt

6.1 The site's spatial relationship to the Green Belt is shown in **Figure 6.1** below (extracted from Figure 9 of the Green Belt Review). The site lies wholly within the Green Belt, adjacent to the south-eastern edge of Radlett. Whilst c27% of the site boundary adjoins the settlement edge, the remainder adjoins other Green Belt land.

Figure 6.1: Relationship to Green Belt



6.2 As noted previously, the site is wholly open in Green Belt terms. The adjoining Green Belt land also qualifies as spatially open, reflecting its relative absence of built development. Such development is confined to the primary school, the property known as Buckfield, the Porter's Park golf clubhouse, a small number of large residential plots further south-east along Theobald Street, and buildings ancillary to agricultural or equestrian uses.

6.3 On a more strategic level, the site adjoins the part of the settlement edge that defines the Green Belt gap between Radlett and Shenley. The site also falls directly

within the Green Belt gap between Radlett and Borehamwood - measured from north-west to south-east, and including the school site, the width of the site extends across c18% of this gap at its maximum extent.

6.4 The site's performance against Green Belt purposes (a)-(d) defined in NPPF 138 is addressed in Section 5 of the Green Belt Review. For reference, these purposes are as follows:

- a) To check the unrestricted sprawl of large built-up areas;
- b) To prevent neighbouring towns merging into one another;
- c) To assist in safeguarding the countryside from encroachment;
- d) To preserve the setting and special character of historic towns: Weak/no contribution; and
- e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

6.5 In the remainder of this section, I summarize the conclusions from the Green Belt Review (GBR) and comment on whether I agree (using the same terminology), following a brief consideration of Green Belt boundaries.

Green Belt Boundaries

6.6 The current boundary of the Green Belt within the site is defined by the settlement edge. This is clearly defined on the policy map and is "readily recognisable" on the ground, as required under NPPF 143(f). Whether or not it is permanent depends on the outcome of the Local Plan process (and this appeal), but there is currently no plan-led proposal to suggest otherwise.

6.7 The GBR concludes that the appeal site "*benefits from strong boundaries*" [GBR 5.5], specifically Shenley Hill, Theobald Street and the woodland edge to the east. Whilst I would agree, this part of the Green Belt is already defined by a strong boundary (the settlement edge), and I see no obvious need for a stronger alternative. In addition, although the two highway frontages can probably be regarded as permanent for the foreseeable future, the status of the woodland to the

east is less clear. Most of this comprises what appears to be a commercial conifer plantation, which is at or approaching an age at which it would normally be felled. Even if this is not the intention, good management suggests that it will need to be selectively thinned. In any event, the current structure of the woodland – and thus its defining influence on the site boundary – cannot necessarily be assumed to be permanent.

Purpose (a)

6.8 The Hertsmere GBA considers the site to make no contribution to this purpose, on the grounds that Radlett does not amount to a “large built-up area”. The GBR, however, disagrees, and considers the site to make a “weak contribution” [GBR 5.7] – although this is summarized in GBR Table 1 as “Weak/No Contribution”. Whether or not Radlett is a large built-up area is debatable, and depends on the frame of reference – it is, for example, larger than Shenley, but smaller than Borehamwood. But the GBR clearly considers this purpose to be engaged, and I shall follow suit.

6.9 “Unrestricted sprawl” is a somewhat emotive term and requires definition. I take it to refer to the likelihood that the built-up area could be allowed to encroach onto adjoining open land in the absence of its inclusion within Green Belt. Recent history indicates that this is very likely to have occurred in relation to the appeal site. The fact that it has not suggests that the Green Belt has done its job. I would therefore consider the site to make a Moderate contribution to this purpose.

Purpose (b)

6.10 The GBR considers the site to make no contribution to maintaining separation between Radlett and Shenley, or between Radlett and Borehamwood (GBR 5.10) – although this is summarized in GBR Table 1 as “Weak/No contribution”. In relation to Shenley, the site does not directly form part of the gap between the two settlements. However, it does maintain a vegetated frontage (with views to the open grassland beyond) to Shenley Hill, which is the main route between Radlett and Shenley. The currently undeveloped condition of the site therefore helps to maintain a perception of separation between the settlements, which I would regard as a Weak contribution.

6.11 In relation to Borehamwood, as noted above, the site directly forms a small, but not insignificant proportion of the gap between the two settlements, as well as part of the wooded frontage to Theobald Street, which is the main route between them. On this basis, I consider the site to make a Moderate contribution to this purpose. The GBR's conclusion of "No contribution" appears to rely on the substantially vegetated character of both gaps between the settlements, which prevents inter-visibility between them. I suspect that the GBR is conflating visual openness with spatial openness (the key test in Green Belt terms), whilst also ignoring the role of perceived separation as experienced from the two routes across the gaps.

Purpose (c)

6.12 The GBR concludes that the site makes a "Moderate to Relatively Weak" contribution to safeguarding the countryside from encroachment [GBR 5.12], citing in particular its "*strong visual relationship*" with the built-up area and its visual separation from the surrounding countryside [GBR 5.11]. As noted previously, the site has an equally strong visual relationship with the adjoining woodland, both visually and as land that meets the test of Green Belt openness. The GBR appears to consider openness in visual terms only.

6.13 As I have demonstrated in Section 4, the site forms part of the countryside in terms of both its intrinsic character and its spatial relationship to the surrounding Green Belt land. Whilst it is not wholly representative of LCA21, it retains a distinctive sense of place that reflects its predominantly open and pastoral appearance, its partly wooded character, its vegetated boundaries, and its visual relationship to the adjoining woodland and settlement edge. Since Green Belt designation has helped to protect its countryside character, I consider the site to make a "Relatively Strong" contribution to this purpose.

Purpose (d)

6.14 The Hertsmere GBA considers Radlett to qualify as a "historic town". The GBR follows suit, but concludes that the site makes no contribution to this purpose, due to its absence of inter-visibility with the two Conservation Areas. Whilst I agree in relation to the Radlett North Conservation Area, the woodland within the site is visible from the edge of the Radlett South Conservation Area in the vicinity of the rugby club (LVIA view 17). In this view across the Tykes Water valley, the woodland

forms part of the wooded skyline that defines the wider setting of the Conservation Area. I therefore consider the site to make a “Weak” – as opposed to “No” - contribution to this purpose.

Purpose (e)

6.15 The GBR concludes that the site makes a “Weak/No Contribution” towards urban regeneration by encouraging the recycling of brownfield land [GBR Table 1]. This is a generic purpose applicable to all Green Belt land (though to a greater or lesser degree in different locations), and since I have no knowledge of alternative development opportunities within Radlett, I have declined to comment.

Summary

6.16 I set out in **Table 6.1** below my conclusions on the site’s contribution to the Green Belt purposes, alongside those in the GBR.

Table 6.1: Contribution to Green Belt Purposes

Purpose	GBR	PR
(a) Checking unrestricted sprawl	Weak	Moderate
(b) Maintaining separation between towns	None	Weak (Shenley) Moderate (B/hamwood)
(c) Safeguarding countryside	Relatively Weak to Moderate	Relatively Strong
(d) Preserving the setting of historic towns	None	Weak
(e) Assisting urban regeneration	Weak/None	No comment

6.17 Whilst I have declined to comment on one purpose (e), I consider the GBR to have underplayed the contribution of the site to the remaining purposes. The greatest difference between us relates to purpose (c) safeguarding of the countryside. Whilst these differences might be dismissed as a matter of professional judgement, I believe the GBR to have erred in three fundamental respects:

- i. By overplaying the site's proximity to and intervisibility with the settlement edge, at the expense of its relationship to the surrounding wooded, Green Belt land and its intrinsically rural character;
- ii. By focussing on openness in a visual sense, rather than on the contribution the site makes to spatial openness, which is the key test for Green Belt purposes; and
- iii. By emphasizing the strategic purpose of the Green Belt, without acknowledging that this purpose is rarely perceived strategically on the ground, but as a mosaic of local landscapes, each of which is capable of contributing incrementally to the wider purpose.

6.18 The points relating to openness and to the influence of the settlement edge have been picked up in a recent appeal decision in a neighbouring borough: ref Land North of Bradmore Way, Brookmans Park, Appeal Ref: APP/C1950/W/22/3307844. In that case, the appeal site comprised an open field adjacent to the settlement edge, and I would highlight the following comments from Inspector Board:

19. Re loss of Green Belt openness, *"...the presence of built form cannot be tempered by the extent of containment of the site."*
20. *"It is not unusual for the Green Belt to abut the built form of a settlement. As such, it is inevitable that many views would be from a built-up environment. However, whilst I acknowledge this and the containment from some aspects this would not reduce the change visually from an absence of built form."*
27. *"Overall...I consider that the site is transitional and not strongly influenced by harsh and urbanizing factors".*

7. Impact of the Proposed Development

7.1 Since the proposed scheme is fully described in the Design and Access Statement (DAS) and application drawings, I confine my attention to those features of direct relevance to its impact on Green Belt openness and the character and appearance of the area. For reference, the Parameter Plan is shown in **Figure 7.1** below.

Figure 7.1: Parameter Plan



7.2 The proposal would transform the site into a development of up to 195 dwellings, together with a medical centre, safeguarded land to permit expansion of the primary

school, public open space, a new priority junction taken off Shenley Hill, serving internal access roads, a secondary access taken off Theobald Street, pedestrian/cycle access, and drainage infrastructure (a swale along the eastern boundary, discharging to a soakaway in a former quarry within the southern woodland).

- 7.3 Developed land, paved surfaces and gardens would occupy c58% of the site⁴. Whilst most of the dwellings would be two-storeys in scale, selected buildings of 2.5-3 storeys are anticipated (e.g. apartment blocks). When other “urban” habitats, as defined in the Biodiversity Impact Calculation, are added, these would in total occupy 74% of the site. As a result, only 26% of the site would remain in its original greenfield condition, comprising the southern woodland and some areas of peripheral scrub.
- 7.4 The Arboricultural Assessment reports that 23 trees/tree groups would need to be removed. As shown on the Landscape Strategy [Drwg CSA/4964/104 rev C], these are located mainly on the Shenley Road frontage (to accommodate the new junction), along several sections of the settlement edge and school boundary, and along the proposed access route through the southern woodland. The Landscape Strategy proposes a substantial amount of planting to, amongst other things, contribute to the amenity of public open space, deliver biodiversity gain, and reinforce the woodland edge and Shenley Road frontage.

Implications for Site and Local Character

- 7.5 The most obvious impact of the development would be to transform the role of the majority (c74%) of the site from being part of the countryside to part of the extended settlement. The settlement edge would move to the east/south-east by c170m close to the Shenley Hill boundary, and by c250m across the central part of the site (if the school extension and medical centre are included). The grassland interior of the site (c68% of its area) would essentially be lost – even though grassland would be retained within gardens, the amenity space (and presumably the curtilage of the medical centre and extended school), it would be fragmented and visually subordinate to the surrounding built development. In perceptual terms,

⁴ As defined in the Biodiversity Impact Calculation

the site would acquire an overwhelmingly suburban and enclosed character, replacing its currently open and greenfield appearance.

7.6 These changes would be evident in a range of local views, at least until such time as planting becomes established, as follows:

- i. Vegetation loss and the introduction of development would affect views from Shenley Hill and footpath 55. Whilst the vegetated road frontage could be restored, the new junction would open up unobstructed views into the developed site.
- ii. Views of at least the roofline of the new dwellings (particularly those of over 2 storeys) from some of the residential streets on the settlement edge cannot be ruled out, displacing the current perception of openness.
- iii. Development is likely to intrude into a substantial number of private views from dwellings and gardens on the settlement edge, obstructing and urbanizing what is currently assumed to be an attractive rural outlook.
- iv. Tree loss and the secondary access route through the southern woodland would be visible to users of Theobald Street. Although it is intended to minimize tree loss through “no-dig” construction and small-scale adjustments to the alignment of this route, any substantial removal (or subsequent decline) of trees might be sufficient to create a gap in the woodland belt.

7.7 There would also be indirect implications on site and local character through the introduction of lighting and activity onto a site that is currently wholly unlit and largely undisturbed, with implications for wildness and tranquillity. Development traffic is likely to be perceptible to frequent users of Shenley Hill (including pedestrians/cyclists and residents).

Review of LVIA Effects

7.8 I have reviewed the landscape effects at Year 1 reported in the LVIA [LVIA Appendix L], and summarize these in **Table 7.1** below, together with my own appraisal by way of comparison, taking account of the differences in sensitivity identified in

Section 4. Receptors for which there are material differences between us are highlighted.

Table 7.1: Comparison of Year 1 Landscape Effects

	LVIA			PRA		
Receptor	S/tivity	Change	Effect	S/tivity	Change	Effect
Woodland/trees within site	M/H	M	MoAd	M/H	M	MoAd
Hedgerow within site	L	SI	SIAd	M	M	MoAd
Grassland within site	M	Su	SuAd	M/H	Su	SuAd
Overall site	M/L	Su	M/SuAd	M/H	Su	SuAd
Countryside context	M	Neg	NegAd	M	SI	SIAd
Built-up area	M	Neg	NegAd	L/M	Neg	NegAd
LCA21	N/A	N/A	N/A	M	SI	SIAd

L = Low, M = Medium, H = High

Nu = Neutral, Neg = Negligible, SI = Slight, Mo = Moderate, Su – Substantial

Ad = Adverse

N/A = Not assessed

7.9 Material differences between us relate to the predicted effects on the following:

- i. Hedgerow within the site: I find a Moderate adverse effect (compared to the LVIA’s Slight adverse) due to the extent of vegetation loss for access purposes;
- ii. Overall site: I find a Substantial adverse effect (compared to the LVIA’s Moderate/Substantial adverse), due to my attribution of higher sensitivity;
- iii. Countryside context: I find a Slight adverse effect (compared to the LVIA’s Negligible adverse), due to my attribution of a greater degree of change; and
- iv. LCA21: I find a Slight adverse effect, due to the loss of locally distinctive characteristics – this is not explicitly assessed in the LVIA.

7.10 Once landscaping is established by Year 15, the LVIA concludes that all effects, except for that relating to the grassland within the site (which would remain Substantial adverse), would:

- i. either be reduced in magnitude (whilst remaining adverse) – the effects on the woodland/trees within the site and on the overall site becoming Negligible adverse and Moderate adverse respectively; or
- ii. become Neutral (the effects on the surrounding countryside and townscape); or
- iii. become beneficial (the effect on the hedgerow within the site).

7.11 Where mitigation is capable of replacing or reinforcing a characteristic or attribute that has been partially harmed (such as the woodland and hedgerow within the site), I accept that a neutral or beneficial outcome could be achieved in the longer-term. However, as indicated by the LVIA's assumptions in relation to grassland, adverse effects that result from the loss of a characteristic or attribute that cannot be replaced are unavoidable and cannot be mitigated.

7.12 This applies to the intrinsic character of the site as part of the countryside. I therefore agree that the long-term effect on site character would remain adverse – but at a Moderate/Substantial (rather than Moderate) level. I also consider that this harmful effect would continue to be perceived – but at a proportionately lower (Slight) level – within its immediate countryside context and LCA21.

7.13 In relation to visual amenity, I generally agree with the effects as reported in the LVIA. In particular, I would highlight the residually adverse effects that are predicted for the views from Shenley Hill, footpath 55, Williams Way, Faggotts Close and the primary school, and the significantly adverse effects predicted for private views from properties on the settlement edge. Effects on the latter views in particular are essentially incapable of mitigation, since they result from a combination of the proximity of the development and its magnitude of change to what is currently an open and attractive outlook.

Implications for Green Belt Openness and Purposes

7.14 The GBR concludes that "*Development of the site will inevitably result in a reduction in the physical openness of part of the Green Belt*" [GBR 5.17]. This is in my view something of an under-statement. Green Belt openness would effectively be lost

from the greater part (c58%) of the site occupied by built development and its curtilage⁵. The GBR proceeds to assert that the “*robust boundary features*” that define the site “*could form a durable and permanent alternative Green Belt boundary...*” [GBR 5.18], which amounts to an acknowledgement that the developed site in its entirety would be unable to fulfil its role within the Green Belt.

7.15 My assessment of the impacts on the Green Belt purposes are set out below, reflecting my assessment of the site’s contribution in Section 6.

(a) Checking unrestricted sprawl

7.16 The developed part of the site would become part of the expanded settlement, and would clearly no longer be able to contribute to this purpose by retaining its essential Green Belt characteristic of openness. Its current (Moderate) contribution would therefore be removed. However, some contribution would still be made by the southern woodland, as a result of which I consider that the site’s overall contribution would be reduced to Weak.

(b) Maintaining separation between towns

7.17 Development of the site would in spatial terms amount to a negligible encroachment into the green gap between Radlett and Shenley, but would be sufficient to reduce the site’s contribution to separation from Weak to None. At the same time, development of the site would amount to an encroachment of up to c18% into the width of the green gap between Radlett and Borehamwood, whilst largely retaining the southern woodland. This would be sufficient to reduce the site’s contribution to separation from Moderate to Weak.

7.18 The GBR argues that the vegetated character of the Green Belt in this area would prevent an overall perception of this reduced separation. Whilst this is broadly correct in visual terms, users of Shenley Hill and Theobald Street would be aware of encroaching development as they travel between the two settlements.

⁵This is taken from the areas for developed land, sealed surfaces and vegetated gardens in the Biodiversity Impact Calculation.

(c) Safeguarding countryside

- 7.19 The only part of the site that would retain an ability to continue to be perceived as part of the countryside is the southern woodland, amounting to c26% of its area (although even this would not remain undisturbed, due to construction of the secondary access and the soakaway within the former quarry). The remainder of the site would acquire a suburban character, and even where original features may partially remain (e.g. the hedgerow on the Shenley Hill frontage), these would become subordinate features. As a result, the site's contribution to this purpose would decrease from Relatively Strong to Relatively Weak.

(d) Preserving the setting of historic towns

- 7.20 Since the southern woodland would remain largely intact, and forms only part of the wooded skyline seen from the edge of the Radlett South Conservation Area, the site's contribution to this purpose (Weak) is considered to be unaffected.

(d) Assisting urban regeneration

- 7.21 Since this purpose lies outside my field of expertise, I have declined to comment.
- 7.22 In summary, I consider that the development would significantly weaken the site's contribution to three purposes – (a), (b) and (c) – but would not affect its contribution to one purpose (d)

8. Summary and Conclusion

- 8.1 The appeal site mainly comprises an elongated pasture field, with ancient deciduous woodland on the southern part, fronting onto Theobald Street. Its northern boundary comprises an established hedgerow with trees, fronting onto Shenley Hill. It is adjoined to the west by the settlement edge (amounting to c27% of the site boundary), together with Newberries Primary School (which lies outside the settlement edge). It is adjoined to the east by Newberries Wood (amounting to c30% of the site boundary).
- 8.2 The site is entirely greenfield in character and forms a parcel of countryside. It is wholly open in Green Belt terms, and is predominantly adjoined by land-uses that also maintain Green Belt openness. It is largely open in visual terms, apart from the southern woodland and a sense of enclosure created by its boundaries.
- 8.3 The visual influence of the settlement edge extends across the open part of the site, creating an abrupt contrast. Newberries Wood, much of which comprises coniferous plantation, also creates a strong vegetated edge, to which the southern woodland is perceived to form an extension. Despite the visual influence of the settlement edge, most of the site's setting retains an overwhelmingly vegetated character that reinforces its role as part of the countryside. This character largely limits potential inward views to locations on/approaching the two road corridors, to the PRow through Newberries Wood, and to streets and dwellings within the built-up area. The attractive appearance of the site contributes to the amenity of such views.
- 8.4 The site is located within Hertfordshire character area 21: High Canons Valleys and Ridges, of which it is substantially representative (displaying 3 out of 6 key characteristics). The combination of its pastoral and wooded character, together with its relationship to the surrounding woodlands and the settlement edge, give the site a distinctive sense of place. I agree with the LVIA that the site is of medium value overall, with the southern woodland being of medium to high value. I also agree that the site does not constitute a valued landscape for NPPF purposes.
- 8.5 In relation to landscape sensitivity, the basis for the LVIA's conclusions is not always clear, since it does not explicitly assess susceptibility. Whilst I agree with the LVIA's assessment of sensitivity for the woodland/trees within the site, I consider it to have

under-estimated the sensitivity of the grassland, and of the overall site, by an order of magnitude. This downgrading of the sensitivity of the site within the LVIA appears to reflect the visual influence of the settlement edge. Whilst this is undeniable, it affects the contextual - rather than intrinsic - character of the site. Even if the LVIA approach were to be correct, the influence of the settlement edge would be neutralised by that of the surrounding woodland.

- 8.6 The site forms part of the Green Belt gaps separating Radlett from Borehamwood and (less directly) Radlett and Shenley. The Green Belt boundary adjoining the site (the settlement edge) is readily recognisable. Of the four Green Belt purposes on which I am able to comment, I consider the Green Belt Review to have under-stated the site's contribution, particularly in relation to unrestricted sprawl (a) and safeguarding countryside (c). This appears to reflect the GBR's focus on the influence of the settlement edge, on visual rather than spatial openness, and on the strategic purpose (rather than local perception) of the Green Belt.
- 8.7 If the proposals were to proceed, more than half (c58%) of the site would be occupied by developed land. When other urban habitats are added, this would increase to 74%. Little more than a quarter of the site would remain in anything resembling its existing condition (predominantly the southern woodland). The majority of the site would be transformed from being part of the countryside to part of the settlement, the edge of which would move c170-250m further to the east.
- 8.8 Its currently greenfield and internally open character would become overwhelmingly suburban and enclosed. Lighting and activity would be introduced onto a site that is currently unlit and undisturbed. These changes would be evident to varying degrees in the public views identified previously, notably from Shenley Hill (including the new vehicular access), from within the built-up area (including a substantial number of properties) and from Theobald Street (the secondary access).
- 8.9 I consider the LVIA to have understated the adverse landscape effects at Year 1 in relation to the on-site hedgerow, the overall site, its countryside context and LCA21. The LVIA considers that these effects would be mitigated to varying degrees by Year 15. However, effects that result from the loss of characteristics or attributes that cannot be replaced would be unavoidable. I therefore consider the long-term effect on site character to remain significantly adverse, and that there would be a degree

of residual harm to its countryside context and LCA21. I generally agree with the visual effects as reported in the LVIA.

- 8.10 The Committee Report states that the Council's landscape advisor considered the harmful effects of the development to be "less than substantial" in landscape terms. Whilst I agree with this in relation to the wider landscape, including LCA21, I disagree in relation to the site itself and its immediate setting.
- 8.11 Green Belt openness would be lost from the greater part of the site. As a result, I consider that its contribution to the purposes would be reduced from Moderate to Weak in relation to (a) and (b), and from Relatively Strong to Relatively Weak in relation to (c), whilst there would be no change in relation to (d).
- 8.12 These harms would be contrary to the following policy tests:
- i. The "fundamental aim" of national Green Belt policy to keep Green Belt land permanently open (NPPF137);
 - ii. Green Belt purposes (a), (b) and (c), as set out in NPPF138;
 - iii. The need to recognise the intrinsic character and beauty of the countryside as per NPPF174(b);
 - iv. The avoidance of inappropriate development in the Green Belt as set out in Core Strategy (CS) policies SP1(vii) and CS13;
 - v. The presumption in favour of sustainable development in CS policy SP2;
 - vi. The need to conserve and enhance the landscape character of the borough as per CS policy CS12; and
 - vii. The need for development to be compatible with its landscape setting and to avoid harm to the openness of the Green Belt, as per SADM policy 26(iv).
- 8.13 In view of the development's degree of conflict with policy relating to Green Belt openness and landscape character/appearance, I consider that the Council were justified in refusing the application. Unless outweighed by other considerations, I would therefore respectfully suggest that the appeal be dismissed on this basis.