Landscape Proof of Evidence

Land Between Haverhill Road and Hinton Way, Stapleford, Cambridge

Appellant: Axis Land Partnerships

PINS Ref: APP/W0530/W/21/3280395

LPA Ref: 20/02929/OUT

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on behalf of Greater Cambridge Shared Planning

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1. Introduction

- 1.1. My name is Dinah Foley-Norman. I am a Chartered Member of The Landscape Institute. I hold a BA (Hons) Degree in Landscape Architecture (1988), a Diploma in Landscape Architecture (1989) and have been practicing as a Landscape Architect since 1992.
- 1.2. I have been employed by Greater Cambridge Shared Planning Service (GCSP) since August 2019 and previously by Cambridge City Council since 2007. Prior to working in local government, I work in private practice in Oxfordshire and Essex.
- 1.3. I have been asked to prepare this Proof of Evidence on behalf of my employer to support and assist with matters of landscape character and visual amenity. My evidence focuses on the Landscape and Visual elements of the original application reference 20/02828/OUT as well as supporting matters relating to Green Belt. I have read, and to the extent that it is within my own expertise agree with, the evidence of Mr Steve Connell.

Statement of Truth

1.4. I confirm and declare that to my knowledge and belief all matters contained in this document are an accurate and true record of all matters put forward. My proof contains facts which I consider as being relevant to the professional opinions I have stated together with all matters which support and affect the validity of those opinions. I believe that the facts I have stated in this proof are true and that the opinions I have expressed are correct.

2. Scope of Evidence

- 2.1. My evidence, which should be read alongside that of Mr. Steve Connell, is set out as follows:
- 2.1.1. Examination of the Landscape and Visual Appraisal submitted with the application together with other relevant documents related to landscape and amenity, including my own assessment of the impacts on the character and appearance of the area; and
- 2.1.2. This being inappropriate development in the Green Belt, my assessment of the effect on the openness and purposes of the Green Belt.

- 2.2. Comments and opinion are based on:
 - Illustrative Masterplan. Drwg. No. J0027450 005 Rev A;
 - the Landscape and Visual Appraisal produced by The Landscape Partnership and dated March 2020 ("the LVA"); and
 - Parameter Plans: J0027450_009 Landscape, J0027450_008 Land Use and Building Heights and J0027450_010 Access and Movement.
- 2.3. My colleague, Carol Newell dealt with the original consultation response and I have appended (as Appendix 5) her response for completeness.
- 2.4. During the preparation of this document, I have used the following research documents:
 - All reports, plans and drawings (including appendices) submitted with the application
 - Consultation responses
 - National, local and strategic planning policies
 - Guidelines for Landscape and Visual Impact Assessment (GLVIA 3)
 - South Cambridgeshire District Council Local Plan 2018
 - South Cambridgeshire District Design Guide SPD 2010
 - Cambridge Inner Green Belt Boundary Study, November 2015

3. Background and Reasons for Refusal

- 3.1. The application is for Outline planning permission for the development of land for a retirement care village in Use Class C2 comprising housing with care, communal health, wellbeing and leisure facilities, public open space, landscape, car parking, access and associated development and public access to a countryside park with all matters reserved except for access.
- 3.2. The application was lodged on 3 July 2020 and a decision notice was issued on 19 April 2021. Consent was refused and there were four reasons for refusal.
 - 1. The site is located outside of the development framework boundary of Stapleford, within the countryside and Cambridge Green Belt.

The proposed development would represent inappropriate development that is, by definition, harmful to the Green Belt in policy terms as the retirement care village does not fall within any of the exception criteria within paragraphs 145 or 146 of the National Planning Policy Framework 2019. The proposal is therefore contrary to Policy S/4 of the South Cambridgeshire Local Plan 2018 and paragraphs 143, 144, 145 and 146 of the National Planning Policy Framework 2019 that seek to resist inappropriate development in the Green Belt.

- 2. In addition to harm caused by inappropriateness, the proposed retirement care village would have a substantial and detrimental impact on the openness of the Green Belt through the introduction of a substantial built form of development and urbanising effect on the site that cannot be said to safeguard the countryside from encroachment, which would undermine the purposes of the Green Belt and including land within it. The proposal is therefore contrary to Policies S/4 and NH/8 of the South Cambridgeshire Local Plan 2018 and paragraphs 133 and 134 of the National Planning Policy Framework 2019 which set out that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
- The proposed retirement care village, by virtue of the introduction of a substantial built form of development on land which is currently open, would fail to reflect or respect the strong rural characteristics of Stapleford or respond to the sites sensitive edge of village location. The development would be out of keeping with the local vernacular, appearing as an incongruous and extensive urban form of development on the village edge. Furthermore, the retirement care village would result in a significant incursion into the landscape and soft rural edge of the village which would do little to respect, retain or enhance the local character and the distinctiveness of the local landscape. The proposal is therefore contrary to Policies S/7, HQ/1, NH/2 and NH/8 of the South Cambridgeshire Local Plan 2018 and paragraphs 127 and 170 of the National Planning Policy Framework 2019 which seek to protect the countryside from encroachment, preserve or enhance the character of the local rural area and protect or enhance valued landscapes.

- 4. The application has failed to provide very special circumstances which, taken individually or collectively, demonstrate why the harm by reason of inappropriateness in the Green Belt and other harm identified, is clearly outweighed by these considerations. The application therefore fails to satisfy the requirements of paragraph 144 of the National Planning Policy Framework 2019.
- 3.3. In summary, these reasons conclude that (my emphasis):
- 3.3.1. The proposed retirement care village would be incongruous in the landscape, fails to respect the strong rural characteristics of Stapleford and its surrounding open countryside or respond to the sensitive edge of village location. It would have a resultant unacceptable level of harm to the rural character of the site and the wider landscape.
- 3.3.2. Development of the site, particularly the area of built development, would also cause an unacceptable level of harm to the visual amenity of those receptors in and adjacent to the site and in the wider landscape.
- 3.3.3. There would be considerable harm to the purposes of Green Belt through the development of the site.
- 3.4. My evidence will elaborate on each of these points.

4. Baseline

The site and its immediate context

- 4.1. The location of the site is at the northeast edge of the village of Stapleford approximately 9km south-east of Cambridge and is approximately 24.37ha in size. The site is open in character and forms a large single 'L' shaped arable field. The site lies immediately outside the Stapleford Development Framework Boundary and is within the Cambridge Green Belt.
- 4.2. The site is bounded on the northwest by Hinton Way and on the southeast by Haverhill Road. The two roads run roughly parallel to one another and both boundaries are formed by 2-2.5m high mature and well-managed hedges. An exception to the boundary type is a small corner of the site located on the northwest boundary which is formed by rear gardens of properties on Hinton Way.

- 4.3. The majority of the southwest boundary is a managed field hedge shared with further arable fields to the southwest. The fields create a large indentation in the village development edge which has the effect of bringing the countryside into the village. Within this area of fields is Stapleford Cemetery which is located in an isolated position from the village and accessed along a narrow single-track road off Mingle Lane.
- 4.4. A small part of the southwest boundary is shared with a small group of houses and bungalows located on Haverhill Road, Gog Magog Way and Chalk Hill. The shared boundary is mainly gappy garden planting and field fencing. This small cluster of properties are perceived as somewhat isolated from the village because of the separation that Stapleford playing fields/recreation ground gives. The row of detached properties to the southeast of Haverhill Road, opposite the playing field, gives the impression of the village proper.
- 4.5. The long northeast boundary is formed by a hedgerow shared with a few scattered properties in large plots located on the crest of Fox Hill.
- 4.6. The topography of the site is significant to the consideration of context; a small portion of the site, adjacent to the village is on flat land, whereas the majority of the site gently rises up the not inconsiderable southwest facing slope of Fox Hill. Fox Hill is one of a series of hills which are part of a number of low hills at the south-eastern tip of the Gog Magog Hills. The contours of the site range from 20m at the village edge to 45m contour near to the northeast boundary. Currently the site is in arable production and therefore is denuded of any central tree or scrub, except for a small copse at the highest point of the site.
- 4.7. The surrounding countryside is open and rolling in character with a large scale arable field pattern bounded by managed, often gappy, hedgerows. There are remnant areas of woodland many of them on the crests of the hills. To the northeast is the A1307 Babraham Road, one of the main approach roads into Cambridge. To the northeast of that road is Wandlebury Country Park and the Wandlebury Ring (Iron Age Hillfort) and to the southwest of the road is Magog Down; both are semi-public open spaces and both sit at a higher (74m) contour than the site. The elevated views from these areas offer good vantage points, some almost a 360° panorama, over the City of Cambridge and its surrounding countryside to the south and southeast of the City. The site itself has no intervisibility with Cambridge but the higher areas of

the site do have very good intervisibility with the surrounding countryside and the village.

4.8. There are no PROWs in the site or in the immediate vicinity of the site, but there is a single Route Bridleway S2 to the south-east. There are no built structures within the site. The historic core of the village which is centred around the Church and the junction between Church St, Mingle Lane and Gog Magog Way, is a designated Conservation Area to the southwest of the site.

Landscape Character

- 4.9. The site is within National Character Area '87: East Anglian Chalk' which has key characteristics of underlying and solid geology dominated by Upper Cretaceous Chalk with distinctive chalk rivers such as the contributories to the Cam; the River Rhee and River Granta. The Granta Valley NCA includes the village and lies and the countryside to the southwest.
- 4.10. We note that the submitted LVA has made use of the 2015 Inner Green Belt Boundary Study to pick up the District Level of the landscape character. It should be noted that SCDC has a draft Landscape Character Assessment as part of the evidence base for the emerging Local Plan, but I accept that this document was not available to the Applicant. However, the Council (and therefore I) support the use of Inner Green Belt Boundary Study as a reliable source of local landscape characterisation.
- 4.11. From that Study, the Site falls within the Chalk Hills Landscape Type and 3B Gog Magog Hills Landscape Character Area and most relevant is the following:
 - "The Gog Magog Hills are a distinctive chalk ridge, which form an area of high ground to the south east of Cambridge. They are a series of rounded hills, capped with beech, lime and sycamore woodland on their summits. It is an open, elevated landscape with a strong sense of time-depth due to the Iron-Age hill fort at Wandlebury and the Roman road to Cambridge, which runs along the ridge. The majority of land is used for arable crop production..."
- 4.12. To the southwest of the site, Stapleford village and the lower lying land along the River Granta is located within the River Valleys Character

Type and LCA 4B Granta Valley. The line between LCA 3B and 4B is shown on along the northern boundary of the village, i.e. sharing the same boundary as the Village Framework. Although the line between one landscape character area and another cannot usually be well defined, the fact that this division runs along the edge of the built form of the village appears appropriate.

4.13. I would also add that the local landscape character has a scenic quality associated with the locally distinctive rolling hills, combined with broadly intact hilltop woodlands and good condition, high quality arable farmland. The open countryside provides Cambridge City and its surrounding villages with a strong rural context, which is a defining character of Cambridge and environs. The low hills, intact woodland and intervisibility with Cambridge also provide a strong sense of place.

Village Urban form

- 4.14. Stapleford village and its adjoining village of Great Shelford comprises mainly one and two storey, low density, semi-detached and detached residential properties within medium and large plots. This is particularly so in the nearby roads of Hinton Way, Haverhill Road, Mingle Lane, Chalk Hill and Gog Magog Way.
- 4.15. The village core accommodates some small scale commercial and office properties as does development along the A1301.

Existing Views

- 4.16. From a distance the site, particularly the higher areas to the north, are visible from part of Fox Hill: see Viewpoint K from Bridleway S2 to the southeast, some 765m distance from the site boundary. With closer views from, (for example) Haverhill Road, views are screened currently by high well managed hedges. The properties on Haverhill Road and Gog Magog Way are clearly visible in Viewpoint K.
- 4.17. Views from properties immediately adjacent to the site will have glimpsed views of the site and countryside beyond but this will be dependent on whether there is continuous boundary vegetation. Views from properties on the northeast boundary will have a clear panorama of the site and its surroundings.

4.18. Properties slightly further away, e.g. facing Haverhill Road will have oblique views of the boundary hedge and the rising ground beyond.

5. The Proposals

- 5.1. For the purposes of the LVA, the author has divided the site into two parts, called Area A and Area B. Area A is on the southwest boundary and adjacent to the properties on Haverhill Road, Gog Magog Way and Chalk Hill. This is the lowest part of the site. This area includes the proposed retirement care village comprising a main village centre (communal building/facilities) and housing with care in the form of bungalows and apartments, car parking and access from Haverhill Road. Open space within Area A is mainly on the boundary together with boundary structure planting.
- 5.2. Area B consists of the majority of the site, that of the rising ground proposed for the countryside park. The two parts of the site are shown separated by a 15m corridor reserved across the site from Haverhill Road to Hinton Way for the proposed Cambridge Autonomous Metro (CAM).
- 5.3. On considering the Illustrative Masterplan and Parameter Plans, only one of which is to be approved with the application, they show:
- 5.3.1. Access and Movement Parameter Plan The main site entrance is off Haverhill Road with three pedestrian accesses off Gog Magog Way, Haverhill Road and Hinton Way.
- 5.3.1.1. It is noted that the vehicle access will require the removal of a minimum of 160m of mature hedgerow along Haverhill Road which in turn will open up views into the site in the short to medium term.
- 5.3.2. Land Use and Building Heights Parameters Plan All of the built form is proposed within Area A and is up to a height of 12m to the southwest stepping down to a height of 7m towards the northeast as the ground begins to rise. The tallest adjacent housing and those in the vicinity, are approximately 9m (2 storey plus roof) to ridge height.
- 5.3.2.1. I understand that the applicant has reduced the height of the development to 9m. Although this modest reduction will be an improvement, overall it makes very little material difference to the considerations of the LVA.

- 5.3.3. Landscape Parameters Plan Area A shows new structural planting and amenity space on the perimeter of the area together with a potential location for surface water attenuation. Area B shows a countryside park/public open space on the largest part of the site on the rising ground of Fox Hill.
- 5.3.4. Illustrative Masterplan the plan shows the largest part of the site as the countryside park with the built form located in the southwest of the site. Many of the buildings are noted to be apartments meaning that the form will be bulkier than an individual house form. The main care village centre is shown as a substantial 'E' shaped building of 12m high along the southwest boundary adjacent to the existing housing. The layout of the buildings is a relatively tight configuration focused on vehicle access roads, parking areas with interspersed landscaped areas.

General comment on Proposals

- 5.4. It is worth commenting on the masterplan although I accept it is only illustrative. The layout shown is very urban in form and seems to have concentrated on vehicle movement and parking. The amenity space for residents is mainly focused on the perimeter, i.e. within the isolated buffer landscape to the rear of buildings. The landscape immediately around the buildings is limited and not arranged in a cohesive way in that it allocates a landscape space to each block as opposed to creating larger community areas where residents can come together. The attenuation area is potentially allocated to the southwest perimeter landscape space adjacent to the existing housing, i.e. the lowest part of the site. I consider that it would be better to integrate sustainable drainage throughout the built form.
- 5.5. The height of the buildings is clearly out of context with the predominantly 1-2 storey residential properties of the village, and the bulk and massing of the buildings is much greater than those in the vicinity. The layout of the development is relatively tight and urban in character, particularly when compared with that of the village.
- 5.6. The building form and the relatively tight and somewhat car-dominated layout will together result in an urbanising effect and appear as an incongruous element on the rural edge of the village and on one of the main routes into the village. I also note that the site, and the cluster of

existing properties to the southwest, are perceived as somewhat isolated from the village because of the recreation ground/green space in between. This exacerbates the incongruity.

5.7. To return to the layout of the proposals, I would consider that with any application of this type, to achieve the best landscape offer for elderly residents, and be able to integrate a sustainable drainage system that goes beyond a simple utilitarian balancing pond, it would be necessary to ease out the layout which would inevitably have the effect of increasing the area of built development.

6. Consideration of the Landscape and Visual Appraisal and opinion

- 6.1. The LVA methodology follows the Landscape Institute Guidelines for Landscape and Visual Impact Assessment (GLVIA), Third Edition. Consultation between my colleague, Carol Newell and the landscape consultant, confirmed the approach to be taken on visualisations as well as the locations for viewpoints. The methodology, found in Appendix 1 of the LVA, is supported and I accept that it is appropriate and thorough.
- 6.2. Since the LVA assesses the site in two parts separated by the line of the proposed CAM it has made it necessary to examine the findings in that way. However, I would make it clear that we are considering the application as one whole and not as two separate sites. The two areas cannot be separated even if the CAM or an alternative rapid transit route comes into being. Currently the two areas are physically and visually linked.
- 6.3. That said, I have examined the site as written as two areas in order to better consider the judgements made in the LVA and to better explain the areas of the assessment where the author of the report and I have a difference of professional opinion.
- 6.4. I consider that the division of the site in that way skews the findings somewhat because judgments on each area have essentially been made in isolation. I have therefore given my opinion/judgement of the site assessed as one using the same methodology as the LVA.

Existing Landscape Character, Assessment of effects and opinion

- 6.5. It is accepted that the Site is not considered to be a 'valued landscape' as defined by paragraph 170a of the NPPF.
- 6.6. As part of assessing the sensitivity of the landscape character of the site and surroundings, the LVA sets out the national, district, local and site landscape characters. The national and district landscape character attributes are taken from recognised sources; National Natural England National Character Areas series. District Cambridge Inner Green Belt Boundary Study, November 2015, and the character of the local context and site were assessed by the author.

6.7. National Level Landscape Character Area

6.7.1. The author has set out the landscape attributes of the national level landscape character as they relate to NCA 87: East Anglian Chalk as set out in Natural England publication. It is accepted that that the landscape character of the site and wider landscape has no national or local landscape designations.

6.8. Landscape character and value – District Level: Gog Magog Hills LCA

- 6.8.1. The LVA found (at 3.6) that "...the value of the Gog Magog Hills LCA overall is Medium and with a High susceptibility to Change from a proposed retirement village development within the landscape type/area as a whole. This is due to the LCA being typically of undulating landform and with a relatively low density, although areas of woodland would provide some containment. This would give rise to a High overall sensitivity to the type of change."
- 6.8.2. I would agree that the value of the character area is Medium and with a High susceptibility to Change and therefore a High overall sensitivity.

6.9. Landscape character and value – District Level: Granta Valley LCA

6.9.1. The LVA also considered the value of the Granta Valley LCA: "It is considered that the value of the Granta Valley LCA overall is Medium and with a Medium susceptibility to Change from a proposed retirement village development within the landscape type/area as a whole. This is due to the LCA being typically of limited topographical change and a more settled landscape where villages are present. This would give rise to a High overall sensitivity to the type of change. The sensitivity to

change from arable to semi-natural grassland and trees/scrub is considered to be Low. However, the sensitivity of the Granta Valley LCA is less relevant since it is located outside the Site and any effects would be indirect."

- 6.9.2. I do not agree that the 'Granta Valley LCA is less relevant since it is located outside the Site and any effects would be indirect'. Firstly, by their nature character areas do not have well defined boundaries. At the boundary area, one character area will naturally have an influence on the other. The boundary line between Gog Magog Hills character area and the Granta Valley happens to sit on the village framework boundary, therefore the sensitivity of the Granta Valley character area is relevant as the proposals will have a direct effect on it. I accept that the effects will be less than on the Gog Magog Hills LCA.
- 6.9.3. I do agree that the value of the Granta Valley character area overall is Medium and with a Medium susceptibility to the change giving rise to a High Overall Sensitivity.

6.10. Landscape character and value - Local

- 6.10.1. At paragraph 3.20 the LVA considered that "the value of the local context is Medium and with a Medium susceptibility to Change from a proposed retirement village development within the landscape type/area as a whole. This is due to Area A of the Site being adjacent to an existing village and in a location where suburban and village settlement has historically extended along the roads leading out of the villages. Area A is also located on a lower lying slope as is the rest of Stapleford. This would give rise to a Medium sensitivity to the type of change. The sensitivity to change from arable to semi-natural grassland and trees/scrub on Area B is considered to be Low"
- 6.10.2. I do not agree that the value of the local landscape character is Medium and has a Medium susceptibility to Change. I appreciate that the built form of the proposed retirement village is located at the lowest and flattest part of the site and adjacent to existing development, but in itself this does not diminish the value of the open countryside immediately adjacent to the existing housing and village. The area adjacent to the village is part of the open countryside which extends outwards in all directions except where it bounds the village. Village development is given a finite boundary in order to protect the areas around them from advancing development.

- 6.10.3. Moreover, the proposals would project built form further beyond the village development edge and into the countryside and would include higher and bulkier buildings than is prevalent in the vicinity, exacerbating the effect. It would introduce a strongly urbanising element where there is none currently and be incongruous within the open and scenic quality of the local landscape.
- 6.10.4. With regard to the rising ground proposed to be a countryside park, the degree of change that would be introduced from open arable farmland to country park should not be underestimated. Currently there is minimal activity on the site apart from that associated with arable farming. If the use of the land were to be altered to a public open space, it might be beneficial to general landscape enhancement and objectives for landscape recreation / biodiversity (Cambridge Southern Fringe Area Action Plan/Policy CSF/5 Countryside Enhancement Strategy), but the changes to the landscape character would nonetheless be significant.
- 6.10.5. The land cover would change to permanent grassland, the area would be crisscrossed with hard surfaced paths, and there would necessarily be associated facilities such as litter bins, dog bins, seating etc.

 Moreover, there would be increased activity on the site. These changes would result in an overall urbanising effect on the landscape character by virtue of human activity and influences. The character would be much changed.
- 6.10.6. Judging the proposals as a whole and using the matrix shown at Table 3 of the LVA methodology (page 8), the local landscape area should have a value of Medium and a Medium Susceptibility to Change. The overall Landscape Sensitivity should be Medium, i.e. none of the site should have an overall Landscape Sensitivity of Low.

6.11. Landscape character and value – The site

6.11.1. Within the LVA the landscape character attributes of the site are broken down into component parts in line with the criteria given in in GLVIA3 and a concluding landscape value is attributed to each component. The landscape value is later combined with the judgement on the site's susceptibility to change from the retirement village proposal to give an overall Landscape Character Sensitivity for the site.

- 6.11.2. In my view the values for Scenic Quality and Perceptual Aspects are slightly underestimated for the reasons given below. An under estimation of any part of the local and site landscape character assessment will, of course, skew the overall findings for the value of the landscape character of the site as well as the site's ability to accept change from development. That in turn has the potential to skew the concluding findings for landscape sensitivity.
- 6.11.3. The LVA (at 3.25) states: **Scenic quality** The Site has limited features that would give rise to scenic quality in its own right. The most attractive feature is the rising and undulating chalk topography and in particular of Area B and how this leads up towards the Gog Magog Hills. The scenic quality of the Site overall is considered to be Medium.
- 6.11.4. The LVA points out that the Site has limited scenic quality in its own right except that Area B, as part of the rising and undulating chalk topography of the Gog Magog Hills, are considered to possess some scenic quality. The majority of the site is on a hillside and exposed for views from some distance from the northeast, east and south. The Site is irrefutably part of the Gog Magog Hills LCA and as assessed above it is agreed that it has an overall Medium value and with a High susceptibility to Change. The point about considering the site as a whole is already made. The two 'Areas' read as one, but given that the rising ground dominates the site as a whole and both areas are part of the scenic Gog Magog Hills, it would therefore follow that the site should merit a scenic quality overall of Medium-High.
- 6.11.5. The LVA (at 3.29) states: **Perceptual aspects** This criterion in the GLVIA relates to experience of wildness and tranquillity. The Site is not particularly tranquil or wild. However, it does form part of the open chalk landscape to the east of Stapleford which leads up to the wooded chalk hills. Perceptual aspects are considered to be Medium to Low being relatively higher for the steeper slopes in Area B and less for the lower lying land of Area A closer to the edge of Stapleford.
- 6.11.6. Again, we are looking at the site as a whole. It is agreed that the site is not particularly tranquil or wild. However, since the LVA recognises that the site forms part of the open chalk landscape that leads to the wooded chalk hills with all the qualities attributed to that Chalk Hills landscape, i.e. Gog Magog Hills LCA, in my view the judgement of

Medium to Low is an underestimate. I consider that the value deriving from the perceptual aspects of the whole site should be Medium.

6.11.7. Overall, the LVA considers that "the Site has a Medium/Low landscape value, with Area B being of relatively higher value at Medium on account of the undulating and higher landform and Area A being Low value." Since we are considering the site as a whole and it is part of the Gog Magog Hills LCA, in my view the site overall should warrant the higher value of Medium.

6.12. Summary of Landscape Sensitivity

- 6.12.1. The summary tables of Landscape Character Sensitivity appear at Tables 3.1 and 3.2 within the LVA. The sensitivity assessment continues the principle of dividing the site into the two distinct areas of development. Table 3.1 shows character sensitivity judgements for Area A and Table 3.2 shows them for Area B. It can be seen that the two tables produce quite different outcomes, whereas if the site were assessed as whole there would be one table giving a judgement for all levels of landscape character. It is clear that dividing the site into two skews the overall judgements for all landscape character scales.
- 6.12.2. On comparing both tables, I note that the findings for the different landscape scales vary considerably because the two areas have been assessed separately. This approach particularly brings to light the skewing effect assessing the two areas separately has on the findings.
- 6.12.3. Overall, in my view Area A and Area B should be considered as one, and as part of the Gog Magog Hills LCA, with an assessment of its own landscape character. The site as a whole should have an overall landscape value of Medium.

6.13. Susceptibility to Change – The Site

6.13.1. The susceptibility to change assesses the relative ability for the landscape to accommodate the change that would result from different types of development. The criteria for the judgement of susceptibility to change are set out in Table 2 in the LVA Methodology. The categories and criteria are appropriately identified and described.

- 6.13.2. The susceptibility to change for Area A is judged in the LVA to be Medium, which within the criteria is "A moderate ability of the landscape to accommodate development of the type proposed. Features likely to have some susceptible to change from development."
- 6.13.3. The justification for that judgement is set out in paragraph 3.32: "Area A within the Site is considered to be of relatively lower sensitivity than the local landscape and district character areas as a whole as it is located on lower lying ground and adjacent to the existing built edge of Stapleford. Stapleford has historically extended along both Haverhill Road and Hinton Way with development on Hinton Way extending up to the 30m contour. Area A is set below the 25m contour."
- 6.13.4. The Susceptibility to Change for Area B is judged in the LVA to be Low, which within the criteria is "A well-defined ability of the landscape to accommodate development of the type proposed. Features has little susceptible to change from development." The type of development for this part of the site is a countryside park and as already pointed out previously, the changes to the landscape character from arable field located on rising ground with exposed views to a countryside park should not be underestimated.
- 6.13.5. If Areas A and B are considered as one site, it would have an overall landscape value of Medium as argued above. It is then appropriate that the Site's Susceptibility to Change should be Medium. In turn the Site's Overall Landscape Sensitivity should be Medium and not Low as indicated in the Tables.

6.14. Effects on Landscape Character and Landscape Features

- 6.14.1. The Effects on Landscape Character and Landscape Features, i.e. the size and scale of change brought about by the proposed development on the local landscape character, is considered in Section 7, Table 7.1: Significance of Effect on Landscape in the LVA.
- 6.14.2. The Significance of Landscape Effect has been shown in the table as a combination of a judgement on magnitude of landscape effect with a judgement of sensitivity of landscape effect. This follows advice given in GLVIA3.

6.15. Significance of Effect on Landscape Character

- 6.15.1. In most instances I agree with the judgement on Magnitude for each Landscape character area. Where I disagree, I have noted it below.
- 6.15.2. Significance of Effect on **NCA 87**: **East Anglian Chalk** at Year 1 is Negligible as it is at Year 15. I would agree with this judgement. This area is very large in scale.
- 6.15.3. The Significance of Effect given in the LVA at a District Level (**Gog Magog Chalk Hills**) at Year 1 is moderate adverse for Area A and moderate neutral for Area B. It is minor adverse for Area A, moderate beneficial for Area B at Year 15. Considering the Site as a whole, as I consider is necessary, I do not agree with these judgements.
- 6.15.4. With a High Sensitivity and Medium Magnitude an outcome of Major-Moderate (Adverse) Significance should have been arrived at in accordance with Table 7 of the methodology. Therefore I believe the site as a whole would be Major-Moderate Adverse effect at Year 1 and Moderate-Minor Adverse at Year 15.
- 6.15.5. The Significance of Effect given in the LVA at District Level (**Granta Valley**) at Year 1 is negligible for both Areas A and B as it is for Year 15. Again, I do not agree with this judgement.
- 6.15.6. As shown at paragraph 6.9.3 above, the value of the character area overall is Medium and with a Medium susceptibility to the change with an overall sensitivity of High. The Magnitude of effect on the Granta Valley LCA is shown in the LVA at Table 7.1. as Very Low (Area A and B) for Year 1, and Very Low (Area A and B) for Year 15.
- 6.15.7. I do not agree with judgement given the scale, geographic extent and duration of the proposals immediately adjacent to the LCA. The Magnitude should be Medium using the criteria shown at Table 4 of the methodology. With a High Sensitivity and Medium Magnitude (using Table 7 of the methodology) the judgement on Significance should be Major-Moderate (Adverse) at Year 1 and Moderate at Year 15.
- 6.15.8. The Significance of Effect given in the LVA at the **Local Level** (up to 1000m from site) at Year 1 is judged to be moderate adverse (Area A)

- and moderate neutral (Area B). At Year 15 it is judged to be moderate neutral (Area A), and moderate/major beneficial (Area B).
- 6.15.9. I do not agree with this judgement, as we are assessing the Site as a whole. As argued above, if the Site is taken as a whole area the Local Level value is Medium with a Medium susceptibility to Change. The overall Landscape Sensitivity should therefore be Medium. With a Medium Sensitivity and Medium/High Magnitude the judgement on Significance of Effect at the Local Level should be Major/Moderate adverse at Year 1 and Minor adverse at Year 15.
- 6.15.10. The Significance of Effect given in the LVA on **The Site** at Year 1 is major/moderate Adverse (Area A) and moderate neutral (Area B) and moderate neutral (Area A) and moderate/major beneficial (Area B) at Year 15. I do not agree with this judgement, as we are assessing the Effect on the Site as a whole.
- 6.15.11. As argued above, if the Site if taken as a whole, its value is Medium and its Susceptibility to Change is Medium. The overall Landscape Sensitivity should be therefore be Medium. With a Medium Sensitivity and High Magnitude (as shown in Table 7.1) the judgement on Significance should be Major/Moderate (Adverse) at Year 1 and Moderate at Year 15.

6.16. Summary of Effect on Landscape Character

6.16.1. In my opinion, assessing the site as two separate areas means the findings of the Landscape and Visual Appraisal have been skewed. Proceeding in that way means that the overall judgements on the Significance of Effect on the different scales of landscape character have been underestimated through making judgements in isolation. The Significance of Effect of the proposals taken as a whole would be higher than assessed in the LVA.

6.17. Existing Views, assessment of effects and opinion

- 6.17.1. The number and extent of the views towards the proposal site as well as the analysis is thorough and I take no issue with it. Visualisations A-M are found in Appendix 3.
- 6.17.2. The location and receptor types are identified and set out in Table 4.1 together with an evaluation of the visual sensitivity. I note that within

this Appraisal there has been no submission of visualisations of the proposals within the existing landscape. However, the approximate extent of the site, separated into Areas A and B, has been indicated on the viewpoints which is helpful.

6.17.3. I would agree with the findings of the assessment that existing views in close proximity to the Site, as opposed to the proposals, are often restricted by existing vegetation or topography and that views from slightly further away and from a distance are more revealing, particularly of the higher parts of the site. I would also agree with the analysis shown in Table 4.1: Local Views. However, because (again) the Site is divided into two areas in the LVA analysis, it is my opinion that the judgements for Susceptibility of Visual Receptor to Change and the Overall Visual Sensitivity is again skewed.

6.18. Effect on views from the proposals

- 6.18.1. The effect on views is shown at Table 8.1 of the LVA and gives a description of Effect and a Significance judgement to each view. A summary of conclusions of visual effects is given from 8.4 to 8.12.
- 6.18.2. It is agreed that the most open public views from roads of the proposed buildings are from Haverhill Road (Viewpoints C, D, E, G, H and I). However, I would not necessarily agree that in close proximity only the higher buildings would be clearly evident from the road above the hedges and at the new site entrance. The LVA does not make it clear if the full extent of hedge removal has been taken into consideration. The creation of the new access requires the removal of 160m (minimum) of mature hedgerow along Haverhill Road. It is a significant amount of tall, deep and well-maintained hedgerow to remove and its loss would expose the majority of the buildings, not just the taller ones, to views from the road. New planting, even 'instant hedging', will take several years, possibly 10 years to attain a height to screen the proposals to the same degree the existing hedge might, especially if set back to ensure appropriate visibility splays.
- 6.18.3. The judgement in the LVA on the effect of the proposals at the closer locations such as Viewpoints D (opposite side of Haverhill Road to the terrace of bungalows) and G (further northeast along Haverhill Road) are that it would be Major/Moderate Adverse effect at Year 1 reducing to Moderate or Minor adverse at Year 15 as the proposed structure planting matures. I would agree with the judgement of

- Major/Moderate for Year 1 but would judge Year 15 to be Moderate as opposed to Minor. Much would depend on the new entrance and the growth rate of the structure planting.
- 6.18.4. It should be noted that the anticipated growth rate of native tree and hedgerow planting is approximately 450mm/year, and that there is no predicted growth in the first year (paragraph 2.6 of the LVA). That would of course depend on the species chosen as not all will achieve the estimated amount of growth.
- 6.18.5. Views from within Stapleford from public roads and footpaths are limited (as illustrated by Viewpoints A, B and E) and the levels of effect are judged to be Minor Adverse at Year 1 and Year 15. A view from the cemetery is judged to be Moderate Adverse at Year 1, diminishing to Moderate/Minor by Year 15. I would agree with these judgments.
- 6.18.6. The elevated views from Magog Down are assessed as being of High sensitivity and that there would be a Medium magnitude of change at Year 1 with a Major/Moderate Adverse effect. By Year 15 this would reduce to Moderate Adverse with the maturing planting around the site. Magog Down is a semi-public open space managed by the Magog Trust whose aim is to restore their landholding to chalk pasture and woodland open for public amenity with provision for wildlife conservation and sanctuary. The view from Little Trees Hill in Magog Down is a promoted viewpoint for the City of Cambridge and its rural surroundings. I would agree with the judgements within the LVA in this respect.
- 6.18.7. Views from private residential properties on Gog Magog Way, Chalk Hill and Haverhill Road are best considered from Viewpoint B (Chalk Hill). This viewpoint is judged to experience a minor adverse effect for Area A (adjacent to the properties) and minor neutral effect for Area B at Year 1, and minor adverse for Area A and minor neutral for Area B at Year 15.
- 6.18.8. The judgement is made up partly by judging the Size/Scale of the effect of the proposals on the view as Low for Area A and this may be mainly due to the existing properties having a certain amount of protection, at least in the longer term, from visual intrusion through a set back distance between them and the proposed buildings together with the structural planting. However I do not accept the size/scale of

the change would be low, or (in turn) therefore a Minor Adverse for Year 1 for the visual effect of the proposed buildings on the adjacent existing properties. My opinion would be that at Year 1 the visual effect of the proposals would be greater, at a Medium level, albeit to some extent dependent on the distance between the existing and proposed properties. I would agree with the longer term (i.e. Year 15) judgements.

6.19. Summary of Effect on Views

- 6.19.1. I agree with many of the judgements for the Effects on Views brought about by the proposals such as from Magog Down, but I differ when considering the views available along Haverhill Road and those from the northeast, east and southeast, because of the impact that removal of the existing hedge would have on opening up views of the site at least in the short to medium term.
- 6.19.2. Views of the site from viewpoints from within the village framework and specifically properties along Haverhill Road, Gog Magog Way and Chalk Hill adjacent to the site would experience a greater effect at Year 1 than described in the LVA.

7. Consideration of harm to Green Belt Purposes

- 7.1. Mr Connell addresses the question of the harm to the Green Belt in his evidence. I add a few observations of my own, which should be read in conjunction with his evidence.
- 7.2. The National Planning Policy Framework ("the Framework") states that great importance is given to Green Belts and that the *fundamental aim* of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.
- 7.3. Mr Connell sets out the place of Green Belt within national and local policy and I do not repeat it here.
- 7.4. In terms of harm to the Green Belt I agree with Mr Connell that Purpose a) to check the unrestricted sprawl of large built-up areas; and Purpose c) to assist in safeguarding the countryside from encroachment, are the most relevant to the appeal proposals.

- 7.5. It has been demonstrated in the consideration of the proposals and the LVA, that the retirement care village, including a main village, housing, open space, car parking, countryside park and access would have a significant effect on the landscape character of the area and of the site and harmful to local views. This is a form of harm to the Green Belt but would be a harmful effect of the proposals even if they were not in the Green Belt.
- 7.6. The proposed development is located on the northern edge of the village and in open countryside. The majority of the site is on the southwest facing slope of Fox Hill allowing the site as a whole to be visually prominent in the landscape. The site has no other development around it except the housing to the southwest. As such this harm to the Green Belt would be visually noticeable.
- 7.7. The proposed care village centre, at 12m high, together with the bulkiness of the buildings and the dense and tight urban form of the layout is incongruous in this location, particularly as it is adjacent to single and 2-storey housing. The layout of the buildings is a tight configuration, apparently chiefly focused on vehicle movement, parking and access, with interspersed landscaped areas. Overall it will have a considerable urbanising effect on the landscape character of the area and bring this urban character of built development out into the open countryside.
- 7.8. In relation to the proposed countryside park, the degree of change from open arable farmland to countryside park should not be underestimated. Currently there is minimal activity on the site but if altered to a public countryside park, the effect on the landscape character would be significant. The land cover would change to permanent grassland, the area would be crisscrossed with hard surfaced paths, and there would necessarily be associated facilities such as litter bins, dog bins, etc. Moreover, there would be increased activity on the site. These changes would result in an overall urbanising effect on the landscape character by virtue of human activity and influences.
- 7.9. However, I accept that this latter effect would not affect the *openness* of that part of the site, per se.
- 7.10. With respect to restricting sprawl, it is clearly evident that the location of the proposed development would project out into the open countryside

- as a somewhat isolated appendage. I agree with Mr Connell that this, together with the height, mass and urban form of the proposals, will create considerable harm to the purpose.
- 7.11. In terms of safeguarding the countryside from encroachment, the appeal site manifestly fails to do this as it will introduce significant built form where there is none at present.
- 7.12. With regard to openness, the site is within the District Landscape Character Area of the Gog Magog Hills. The distinctive open and rolling chalk hills and gently undulating chalk plateau are prominent and a characteristic feature in this part of the Cambridgeshire landscape. The area is mostly large-scale arable landscape of arable fields, low hedges and few trees, giving it an open, spacious quality.
- 7.13. Consequently, the appeal proposals will have a significant impact on the open nature of this part of the Cambridge Green Belt by introducing significant built form into an area which is currently open countryside.
- 7.14. In my opinion the appeal proposals, taken as whole, would conflict with the purposes of the Green Belt particularly, a) to check the unrestricted sprawl of large built-up areas, and b) to assist in safeguarding the countryside from encroachment.
- 7.15. I thus agree with Mr Connell about the harm to the Green Belt itself, including its purposes. To that harm can be added the landscape and visual harm I assess in this proof of evidence, which has been underestimated by the Appellant in the LVA.

8. Summary and Conclusions

- 8.1. In my view, assessing the site as two separate areas in isolation has resulted in the findings of the Landscape and Visual Appraisal being skewed. The overall judgements on the Significance of Effect on different scales of landscape character have consequently been underestimated. The Significance of Effect of the proposals if taken as a whole would be higher than assessed in the LVA.
- 8.2. With regard to the Effects on Views, whilst I support many of the judgements, I differ when considering the views available along Haverhill Road and those from the north-east, east and south-east,

because of the impact that removal of the existing hedge would have on significantly opening up views of the site.

8.3. Viewpoints from within the village framework and specifically adjacent properties would also experience a greater immediate effect than described in the LVA.