

# **REBUTTAL PROOF on LANDSCAPE MATTERS**

**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

Produced by Dinah Foley-Norman BA (Hons), Dip LA, CMLI  
on behalf of Greater Cambridge Shared Planning

Issued: 22 November 2021

## 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 submitted a Proof of Evidence on 9 November 2021 on behalf of Greater Cambridge Shared Planning in regard to this appeal and am now submitting this rebuttal in response to various matters raised by Mr Jonathan Billingsley in his Proof of Evidence.
- 1.3 I do not intend to offer a response to all issues raised and where I have not dealt with an issue this does not imply that I agree with it.
- 1.4 Clarification on the length of the hedgerow along Haverhill Road has been given and agreed. The agreed length of the hedgerow to be removed in order to accommodate the vehicle entrance to the site is 185m. This clarification has enabled agreed judgements on impacts. See para 6.1 and 6.2 below.
- 1.5 It should be noted that within the proof, Mr Billingsley makes reference to the Landscape and Visual Appraisal Addendum Statement dated December 2020. On writing my Proof of Evidence, I had not had sight of the Addendum. See comments at paragraph 7.
- 1.6 I wish to highlight that an error has been detected in my Proof of Evidence at paragraph 6.9.3 where I argue that the Granta Valley LCA has a High Overall Sensitivity. With a Medium landscape value and a Medium Susceptibility to Change the Overall Sensitivity should be Medium which in turn would result in a Significance of Effect at year 1 of moderate adverse and minor at year 15.

## 2. Green Belt

- 2.1. The TLP Proof of Evidence makes reference (at 8.33. to 8.38) to the recently published Green Belt Assessment (August 2021) which identifies the area within which the appeal site sits as one to which Very High Harm would occur if it was 'released' from Green Belt. The proof argues that since the assessment parcel (GS8) in the Green Belt Assessment is much larger than the proposed developed area of the appeal site, if an assessment were made of 'releasing' Area A alone, *"there would be a lower contribution towards the purposes of Green Belt and a much lower level of harm, particularly after allowing for the mitigation proposals around Area A and within Area B.*

- 2.2. The proof concludes, in any event, that the Assessment should attract very little weight (8.38).
- 2.3. The Assessment supports my case to this inquiry. I accept that the parcel concerned, GS8, is larger than the appeal site, and obviously, converting all of the land comprised in GS8 to built form would be more harmful than converting just some of it. However, I am not sure the point is as simple as that. The methodology is clear – see 3.8 and 3.140 – that where lesser harm would result from the ‘release’ of a smaller part of any given parcel, that would be subject to separate assessment. That has not been done in respect of GS8. What I take from the Assessment is that this is an area of Green Belt which scores highly on its assessment of value, and for which significant harm would be caused if it were lost to development. Mr Billingsley seems to agree, suggesting that removing Area A from the Green Belt would give rise to Moderate/High harm in this context.
- 2.4. The proof also highlights that the assessment identifies the land directly west of Area A, Parcel GS9, has a Moderate/High harm rating if released and developed. The appeal site is in an area which the assessment concludes is essentially inappropriate for release. It does not exclude Area A (or any part of GS8) from that conclusion
- 2.5. Also see paragraph 5.3 (below) regarding the landscape mitigation and Green Belt related to openness.

### **3. Landscape Character Assessments**

- 3.1. The proof has additionally picked up the recently published draft Landscape Character Assessment (August 2021) and points out that the boundary of the character assessment area shown in the draft Assessment differs from that shown in the Cambridge Inner Green Belt Study (LCA 3B Gog Magog Hills) which was used in the LVA. The boundary of the equivalent assessment area (7B Gog Magog Chalk Hills) in the draft Landscape Character Assessment has moved northward and the appeal site is located in a Landscape Character Area 3D, so the observation is factually correct. However, the proof argues that this lessens the value of the appeal site in landscape character terms particularly Area A at the lower level of the whole site. I disagree.
- 3.2. The draft Landscape Character Assessment does not offer ‘value’ judgements on landscape character; it is descriptive, and gives the baseline landscape characteristics of each assessment unit. It offers a description of landscape condition, not value and therefore a higher or lesser value should not be assumed. The landscape character of the appeal site has not changed

as between the two studies; it simply falls on a different side of a dividing line between character areas.

3.3. I have stated in my proof that landscape character assessment area boundaries cannot be tightly drawn. The boundary of each assessment unit is usually chosen to be the nearest defined boundary on the ground thought to be appropriate, e.g. a field boundary hedge or road etc. It is not precise and there is naturally some blurring of the edge of one character area and its neighbour. Additionally, there will be landscape influences crossing from one character area to another. The appeal site includes the southwest slope of Fox Hill gently rising up from within Area A to the northern boundary. In my opinion the appeal site is strongly influenced by Fox Hill and Fox Hill is part of the Gog Magog Hills, i.e. the appeal site is strongly influenced by the sloping landscapes of the Gog Magog Hills..

#### **4. Landscape Mitigation**

4.1. The TLP proof frequently makes reference to the beneficial screening effect of the proposed structure planting around Area A. There is a strong reliance on the planting to overcome any adverse effects on landscape character and views as well as to mitigate the harm to green belt. There is also a strong reliance on the Countryside Park to 'balance' any harmful effects created by the built area: *'In conclusion while there would be some adverse effects in landscape and visual terms from the Retirement Care Village in the short to medium term, I consider that proposals for the appeal site when taken as a whole and including the Countryside Park would in the medium term and beyond result in a net benefit in landscape character terms to the site and local area.'*

4.2. It is understood that the parameter plans will be approved through a condition imposed on any outline planning permission. Since the parameter plans do not contain a detailed level of information such as minimum dimensions of structure planting and minimum set back of buildings etc. there remains a certain amount of uncertainty regarding landscape mitigation. Much still depends on what landscape can be secured at reserved matters stage. For instance, a greater amount of landscape area in the central part of the developed area.

#### **5. Visual mitigation to the developed area of the site**

5.1. Unlike the LVA, the TLP proof (correctly, in my view) considers Areas A and B together, and at year 15 suggests there would be an overall moderate beneficial effect due to the landscape mitigation. We both note that the LVA assessed the two areas separately. We differ, however, on the result of assessing the site as a whole.

5.2. In my opinion, and taking the site as a whole, the built form would remain visible above the replacement and new structure planting at year 15, if it remains at 12m high. If the height reduces to 9m I would expect some elements of the roofline to still be visible at year 15. In the longer term, I accept the development would most likely be screened completely except at the entrance. However, I should point out that in the long term, if the planting proposals were to become a reality, the built area would become screened completely in such a well-defined way it may well result in a Stapleford village edge unlike any other. Most nearby village edges that back onto arable Green Belt are loose and gappy garden planting. I believe this will result in the appeal site being more noticeable, even in the longer term. It would also give the perception of further isolating the care village from the village proper.

5.3. Furthermore, the screening/structure planting proposed for the perimeter of the developed area would, in my opinion, have an effect on openness. By its nature, 'screen' planting reduces views and sometimes blocks them altogether. As the proposals would extend developed land into the Green Belt and have well defined structure/screen planting around the developed area, there would be a negative effect on openness from both a visual and spatial perspective. In essence, screening development which would otherwise cause harm to openness is not a complete answer to that harm – the screening itself reduces openness.

## **6. Clarification on length of hedgerow to be removed along Haverhill Road**

6.1. Mr Billingsley's proof has helpfully reviewed the most likely length of hedge to be removed as a result of constructing the site vehicle entrance. A new dimension of 185m has been taken from the Access Assessment – Option2 drawing (drg no. 406.09693.00002.14.H011.2) which was not available previously. I had covered the point at paragraph 6.18.2 of my proof and had taken a figure of a minimum of 160m from the Highways Officer's comments. No judgements on the significance of effects on visual or landscape character were given by me at the time of writing my proof due to the uncertain dimension of hedge to be removed.

6.2. The change in the dimension has resulted in consequent amendments being made to the Magnitude of Landscape and Visual Effects and Significance. The amendments are covered and agreed in the Landscape Statement of Common Ground.

## **7. LVA Addendum Statement dated December 2020**

7.1. The Addendum concerns itself with a response from the Appellant to the GCSP Landscape Officer's (LO) additional response dated 18 August 2020 which focused on the Landscape and Visual Appraisal (LVA).

7.2. The Addendum compares the findings of the LVA and the comments of the LO. The LO's comments on the LVA are somewhat generalised and do not include an in-depth analysis of the LVA. The LO does however state that she does not agree with the level of adverse effect it suggests Area A would have at Year 1 and Year 15. This statement is not expanded upon, but the following paragraph gives a justification for the opinion as it is contrary to the Statement of Environments Opportunity as outlined within NCA 87. The LO also picks up on views from the northeast and southeast, and notes that there would be a higher level of effect than that identified in the LVA.

7.3. The Addendum takes the opportunity to give an assessment of the appeal site when considered in the round as opposed to two separate areas – an approach I agree is the correct one:

*'However, to aid an overall assessment of the planning balance it is also worth considering to what extent the landscape and visual effects that would arise on one part of the site would be offset by proposals on the other part of the site. This overall balancing of landscape and visual effects has not previously been considered by either the LVA or the LO, but is now provided in Section 3 below'.*

7.4. The conclusion gives an opinion of the 'balance' between the harmful level of effect on Area A and the beneficial effect on Area B and that the two effects balance one another out. I have carried out essentially that same exercise but I do not consider one 'offsets' or balances the other, as I have set out in my proof. Both 'parts' of the appeal proposals have an effect on openness, views and landscape character; the overall effect is harmful.

## **8. Conclusion**

8.1. I conclude in my main proof of evidence that the Landscape and Visual Appraisal, in assessing the site as two separate areas in isolation has resulted in the findings being skewed and the overall judgements on the Significance of Effect being consequently underestimated. The Significance of Effect of the proposals if taken as a whole would be higher than assessed in the LVA. Mr Billingsley's proof does not alter that opinion, although it does consider the site as a whole and offers an opinion on the 'balance' between the harmful effect of the developed area (Area A) and the beneficial effect of the proposed countryside park (Area B). We disagree on that opinion.

8.2. I do not see that the two updated Assessments; the Green Belt Assessment and the Landscape Character Assessment (both published in August 2021), support Mr Billingsley's arguments regarding the level the harm to the Green Belt or lessen the 'value' of the landscape with which we are concerned here.

If anything the documents support my analysis of the harm likely to be caused if the appeal site is developed as proposed.