

## Landscape, Visual and Green Belt Response to Third Party Statements

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### 14.26 J King

**Comment** The speaker objects to development on Green Belt land and considers that the Site comprises valuable green fields next to ancient woodland. Concerns are also raised about harm to wildlife, countryside character and the loss of open green space.

#### Response

The Site's landscape value and sensitivity are assessed in the LVIA. The assessment concludes that the Site comprises predominantly ordinary arable farmland and is not a rare landscape type or a particularly scenic landscape. Whilst the Site contains ancient woodland and boundary vegetation of value, it is considered capable of accommodating development while retaining most structural vegetation and maintaining appropriate buffers to ancient woodland. See LVIA and Green Belt Assessment, paragraphs 4.19 to 4.23.

The proposals retain the ancient woodland, provide a 30 metre buffer to woodland areas, retain the public footpath network, introduce substantial new green infrastructure and country park provision, and deliver biodiversity net gain. See LVIA and Green Belt Assessment, paragraphs 5.1 and 5.8 to 5.12.

The LVIA concludes that, although the loss of open arable land represents an adverse landscape effect on the Site itself, effects on the surrounding landscape would be limited because of the Site's contained nature and the retention of substantial vegetation. See LVIA and Green Belt Assessment, paragraphs 5.24 to 5.27.

### 14.27 Butler

**Comment** The speaker argues that biodiversity net gain claims are not credible and that "grey belt" is merely a relabelling exercise intended to facilitate development. The speaker also suggests that the proposal would be harmful to the environment.

#### Response

The proposal includes extensive landscape and ecological enhancement measures, including a country park, new native tree planting, a community orchard, an open space network, wetland habitats and biodiversity enhancements. The LVIA records that the proposal is capable of delivering a 34% increase in habitat units and a 42% increase in hedgerow units. See LVIA and Green Belt Assessment, paragraphs 5.1 and 5.9 to 5.11.

The classification of the Site as grey belt is based on the definition in the NPPF rather than a relabelling exercise. The Green Belt Assessment concludes that the Site does not strongly contribute to Green Belt purposes (a), (b) or (d) because of its contained nature and the limited effect on the wider Green Belt. It therefore meets the NPPF definition of grey belt. See Green Belt Proof of Evidence, paragraphs 5.1 to 5.28.

## 14.28 Tett

No relevant landscape comments

## 14.29 Wall

**Comment** The speaker considers the Site to be a valued landscape.

### Response

See response to 14.26

## 14.30 Barry Grant - Croxley Green Residents' Association

**Comment** Mr Grant considers the Site to be a valued Green Belt landscape that prevents urban sprawl and argues that the development would project as a finger of development into open countryside.

### Response

The Green Belt Assessment acknowledges that the Site currently forms open countryside, but concludes that development would be strongly contained by surrounding woodland and parkland features. The Council's Stage 2 Green Belt Assessment also found that release of the Site would have a negligible impact on adjacent Green Belt because of the containment provided by ancient woodland and registered parkland. See LVIA and Green Belt Assessment, paragraphs 6.18 to 6.20 and 6.26 to 6.32.

In landscape and visual terms, the LVIA concludes that views into the Site are generally limited by vegetation and topography. It also concludes that the development would not give rise to material effects on the wider landscape or townscape character, including the Conservation Area or Registered Park and Garden. See LVIA and Green Belt Assessment, paragraphs 4.6 to 4.18 and 5.24 to 5.27.

Whilst the landscape north and east of the Site is recognised as being of high value because of the registered parkland and ancient woodland, the LVIA concludes that the development would remain physically and visually separated from these features through retained vegetation, buffers and open space. See LVIA and Green Belt Assessment, paragraphs 4.22, 5.8 to 5.10 and 5.25.

## 14.32 Cheryl Stungo - Three Rivers District Councillor, Parish Councillor and Croxley resident

**Comment** Councillor Stungo highlights the importance of Green Belt land for recreation, wellbeing, mental health, community identity and access to nature. She also argues that calling the Site "grey belt" undermines Green Belt principles and that the Site should remain undeveloped countryside.

### Response

The importance of access to nature and Green Belt land is acknowledged. The proposals retain and enhance public access across the Site through retention of the existing public footpath, creation of new recreational routes, provision of a country park, children's play facilities, a community orchard and extensive areas of new publicly accessible green infrastructure. See LVIA and Green Belt Assessment, paragraphs 5.1 and 5.8 to 5.12.

The Green Belt Assessment concludes that the Site does not strongly contribute to Green Belt purposes (a), (b) or (d), and therefore constitutes grey belt land under the NPPF definition. See Green Belt Proof of Evidence, paragraphs 5.1 to 5.28.

The LVIA concludes that the development would form a logical extension to the existing settlement and that there is no landscape or visual reason why development of the Site would be unacceptable. See LVIA and Green Belt Assessment, paragraphs 5.3 to 5.5 and 5.24 to 5.27.

### 14.33 Guy Parks - Croxley Green Parish Council

**Comment** Mr Parks states that the Site should not be classified as grey belt because Little Green Lane and its hedgerows form a clear Green Belt boundary. He considers that the proposed built form would extend into the countryside as a series of “fingers”, representing urban sprawl. He also considers that the proposal would harm the setting of Durrants House and require removal of a historic hedgerow.

#### Response

The issue of grey belt status and the Site’s contribution to Green Belt purposes is addressed in the Green Belt Proof of Evidence. The assessment concludes that, whilst the Site makes some contribution to Green Belt purposes (a) and (c), it does not make a strong contribution to purposes (a), (b) or (d), and therefore falls within the NPPF definition of grey belt. The Site is strongly contained by extensive woodland and landscape features including Whippendell Wood, Dell Wood, Long Newland’s Spring and Cassiobury Park. See Green Belt Proof of Evidence, paragraphs 5.1 to 5.28.

The LVIA concludes that the development would form a logical extension to the existing settlement and would be clearly contained by permanent landscape features, limiting effects on the wider Green Belt. See Green Belt Proof of Evidence, paragraphs 5.13 to 5.16.

In relation to Durrants House, the LVIA identifies that views towards the listed building are currently available from parts of the public footpath through the Site. A central green corridor has been incorporated within the masterplan specifically to retain a visual connection between the footpath and Durrants House. Areas of open space have also been included to acknowledge and respect the listed building from a landscape perspective. See LVIA and Green Belt Assessment, paragraphs 4.8, 5.1, 5.14 and 5.24.

The proposed access arrangements require the removal of sections of hedgerow along Little Green Lane. However, the LVIA confirms that most structural vegetation and hedgerows will be retained and substantial new planting, green infrastructure and habitat creation are proposed. See LVIA and Green Belt Assessment, paragraphs 5.6 to 5.11.

### 14.34 Chris Mitchell - District Councilor and Croxley Green Resident

**Comment** Mr Mitchell questions whether the Site can properly be regarded as grey belt. He refers to the Arup Green Belt Review and considers that Parcel CG8 remains Green Belt land. He argues that the Site makes a strong contribution to Green Belt purpose (a), that Little Green Lane represents a clear settlement boundary, and that development would create a significant extension or “finger” of development into open countryside, resulting in urban sprawl.

#### Response

The Green Belt Assessment acknowledges that the Site lies within the Green Belt but concludes that it does not make a strong contribution to Green Belt purposes (a), (b) or (d), and therefore meets the NPPF definition of grey belt. The assessment identifies the strong containment provided by Whippendell Wood, Dell Wood, Long Newland’s Spring and Cassiobury Park, which physically and visually enclose the Site and limit effects on the wider Green Belt. See LVIA and Green Belt Assessment paragraphs 6.26 to 6.32 and 6.45 to 6.51.

The suggestion that development would form a “finger” of urban sprawl is specifically addressed in the Green Belt evidence. The Green Belt Assessment concludes that the proposal would form a logical and contained extension of Croxley Green, rather than an incongruous protrusion into the wider countryside. See

LVIA and Green Belt Assessment paragraphs 5.3 to 5.5 and 6.27 to 6.32. The Green Belt Proof of Evidence similarly concludes that the development would not represent an extended finger of development into the Green Belt.

Whilst Little Green Lane currently forms the settlement edge, the assessment concludes that stronger and more durable landscape boundaries exist beyond the Site, including the surrounding woodland blocks and parkland, which would continue to define the Green Belt following development. See LVIA and Green Belt Assessment paragraphs 6.26 to 6.32.

## 14.35 Andrew Gallagher

**Comment** Mr Gallagher describes the appeal Site as an important part of the setting of Croxley Green. He refers to the fields, footpaths and surrounding woodlands as contributing significantly to local character and residents' enjoyment of the area. He also suggests that the proposal would result in cumulative planning harm, including harm to the Green Belt.

### Response

The contribution made by the Site to local character and recreation is recognised within the LVIA. The assessment notes the presence of public rights of way crossing and adjoining the Site, the surrounding woodland network, and the relationship of the Site to the wider countryside. See LVIA paragraphs 3.33 to 3.36 and 4.19 to 4.23.

The proposal retains the existing public footpath through the Site, provides additional recreational routes, introduces a substantial country park, retains the Ancient Woodland and delivers significant new green infrastructure and biodiversity enhancements. See LVIA paragraphs 5.8 to 5.13.

The Green Belt Assessment concludes that, whilst development would inevitably result in harm to openness within the Site itself, the effects would be largely localised and would not fundamentally undermine the wider Green Belt because of the strong containment provided by the surrounding woodland and parkland. See LVIA and Green Belt Assessment paragraphs 6.38 to 6.51.

## 14.36 Kingsley Jolowicz - Vice Chair, Croxley Green Parish Council

**Comment** Mr Jolowicz considers that the proposal would significantly alter views across open countryside and cause harm to the setting of Durrants House. He argues that the proposed density, layout and scale of development are out of character with Croxley Green, particularly the use of three- and four-storey buildings. He also considers that the Site's topography has not been adequately taken into account and that the landscape and visual effects of development on rising ground have not been properly assessed.

### Response

The LVIA assesses the Site's topography, visibility and landscape character in detail. The assessment includes analysis of landform, public viewpoints, public rights of way and views from surrounding residential areas. It concludes that visibility of the Site is generally limited by existing vegetation, woodland and topography, and that the Site is well contained within the wider landscape. See LVIA paragraphs 4.1 to 4.18.

The LVIA recognises that the Site's open arable character would change as a result of development and describes this effect as adverse. However, it concludes that effects on the wider landscape would be limited because of the Site's contained nature, the retention of structural vegetation and the provision of substantial areas of green infrastructure. See LVIA paragraphs 5.24 to 5.27.

In relation to Durrants House, the LVIA specifically identifies views towards the listed building from the public footpath crossing the Site. The illustrative masterplan includes a central green corridor specifically

intended to retain a visual connection between the public footpath and Durrants House. Areas of open space have also been incorporated within the development to acknowledge and respect the listed building from a landscape perspective. See LVIA paragraphs 4.8, 5.1, 5.14 and 5.24.

With regard to scale and character, the LVIA explains that development adjacent to the existing settlement edge would be predominantly two storeys in height, increasing to three and four storeys only within the central parts of the development. The assessment concludes that, due to the contained nature of the Site and the proposed landscape framework, the development would form a logical extension to Croxley Green and would not result in material landscape or visual effects on the wider area. See LVIA paragraphs 5.3 to 5.5 and 5.24 to 5.27.

## 14.37 Jeremy Hollands

No relevant landscape comments

## 14.38 Sheryl Porter

**Comment** Dr Porter expresses concern that measures to address parking and traffic could change the appearance and character of surrounding residential streets. She also states that the Site is regularly used by wildlife, including migratory geese, muntjac deer and badgers, and considers that the land is valuable for biodiversity.

### Response

The comments regarding parking and the appearance of surrounding residential streets relate primarily to highways and traffic matters. However, the LVIA confirms that the proposed development has been designed around retention of the Site's principal landscape features, including boundary hedgerows, woodland and structural vegetation, together with extensive new planting and green infrastructure. See LVIA paragraphs 5.6 to 5.12.

In relation to ecology and biodiversity, the LVIA confirms that the Ancient Woodland within and adjoining the Site would be retained, that a minimum 30 metre woodland buffer would be maintained, and that substantial habitat creation and landscape enhancement measures are proposed. These measures include a country park, meadow grassland, wetland habitat, native tree planting, community orchard and biodiversity enhancements capable of delivering biodiversity net gain. See LVIA paragraphs 5.8 to 5.12.

## Repeated comments

Several speakers raise the same broad concerns: that the Site should not be treated as grey belt; that development would create urban sprawl or a finger of development; that Little Green Lane should remain the permanent Green Belt boundary; and that the countryside, views and landscape value of the Site would be lost.

These matters are addressed in the evidence. It is recognised that there will be some adverse change and loss of open arable land within the Site, however, the assessments have found that the effects would be localised. The Site is visually and physically contained by woodland and parkland; most structural vegetation would be retained; new green infrastructure and public access would be provided; and the proposal would form a logical extension to Croxley Green rather than an uncontained projection into the wider countryside. See LVIA and Green Belt Assessment, paragraphs 5.3 to 5.27 and 6.26 to 6.51; and Green Belt Proof of Evidence, paragraphs 5.1 to 6.7.