FINAL



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LANDSCAPE STATEMENT

in response to

Proposed Growth Areas TR01, TR02 and TR03 indicated in the Emerging Strategy for Growth for the New Dacorum Local Plan (to 2038)

on behalf of **Tring Town Council**

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Landscape Statement by Huskisson Brown Associates In response to the New Dacorum Local Plan (to 2038) June 2021

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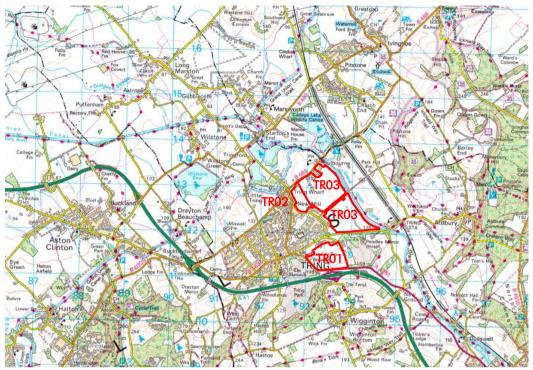
1 INTRODUCTION AND BACKGROUND

- 1.1 Huskisson Brown Associates (HBA) is a firm of Chartered Landscape Architects, established in 1987 (as David Huskisson Associates Ltd) and registered since then with the Landscape Institute. HBA has been a member of the Institute of Environmental Management and Assessment since 1992. All directors of the Practice are Chartered Members of the Landscape Institute.
- 1.2 The Practice has undertaken a range of environmental planning and landscape and visual assessment and design work for many clients including public bodies, private companies and individuals on projects including commercial, industrial, retail, recreational, healthcare, agricultural, infrastructure and residential schemes. HBA has undertaken assessment work in Conservation Areas, in National Parks and in Areas of Outstanding Natural Beauty and other environmentally sensitive areas. The Practice also has extensive experience of providing development management and strategic planning advice to Local Planning Authorities. HBA has significant experience in presenting landscape and visual evidence at planning appeals and Local Plan examinations.
- 1.3 HBA is now retained by Tring Town Council to provide landscape advice in connection with the emerging new Dacorum Local Plan, in particular relating to three potential Major Urban Extensions identified around Tring:
 - TR01 Dunsley Farm (400 dwellings)
 - TR02 New Mill (400 dwellings)
 - TR03 East of Tring (1,400 dwellings)
- 1.4 We note in this regard that following the consultation on the Emerging Strategy for Growth stage of the emerging Local Plan, Dacorum Borough Council has agreed a number of future strands of work looking at boosting the development contribution from urban capacity and brownfield sites. This work will feed into the continuing development of the Local Plan and the potential allocation of development sites around Tring.
- 1.5 This Landscape Statement provides a critical appraisal of the relevant new Dacorum Local Plan (2020-2038) Emerging Strategy for Growth documents and supporting landscape evidence base documents, insofar as they relate to these sites and the countryside around Tring, primarily:
 - Site Selection Topic Paper Dacorum Local Plan (2020-2038) Emerging Strategy for Growth November 2020
 - The Green Belt & Rural Area Background Topic Paper November 2020
 - Site Assessment Study for Dacorum Borough Council, Volumes 1 4, January 2020 by AECOM
 - Dacorum Borough Landscape Sensitivity Study: Draft Report, April 2020, by Arup for Dacorum Borough Council
 - Green Belt Review Purposes Assessment (Stage 1 Green Belt Review) Prepared for Dacorum Borough Council, St Albans City and District Council and Welwyn Hatfield Borough Council, November 2013 by SKM

- Stage 2 Green Belt Review and Landscape Appraisal Report, January 2016 (Published December 2016), by Arup for Dacorum Borough Council
- Dacorum Borough Council Stage 3 Green Belt Review Final Report Issue, 27
 August 2020, by Arup for Dacorum Borough Council
- Dacorum Urban Design Assessments Update Paper, July 2011
- 1.6 Our comments generally relate to the soundness of the documents in so far as they relate to the proposed development of sites TR01, TR02 and TR03 and landscape and visual matters in Tring town parish.
- 1.7 In addition, the following sources, Supplementary Planning Documents, Advice Notes and other published guidelines and studies have been reviewed and inform this Landscape Statement:
 - Hertfordshire Landscape Strategy. Landscape Character Assessment for Dacorum, May 2004. Commissioned by the Chilterns Conservation Board, Dacorum Borough Council and Hertfordshire County Council from The Landscape Partnership in 2002 and formally adopted as supplementary planning guidance by Dacorum Borough Council on 5th May 2004.
 - Strategic Housing Land Availability Assessment (SHLAA) 2016, Volume 2: Site Schedules, Final report, April 2016, Dacorum Borough Council
 - National Planning Policy Framework, March 2012 (updated Feb 2019);
 - National Character Area Profiles, Natural England;
 - An Approach to Landscape Character Assessment, Natural England, October 2014;
 - MAGIC website;
 - Historic England website;
 - On line review of Historic Ordnance Survey mapping;
 - Bing & Google Earth and Google Maps;
 - Guidelines for Landscape and Visual Impact Assessment, (GLVIA3) published in April 2013 by the Landscape Institute and the Institute of Environmental Management and Assessment; and
 - Landscape Institute Technical Guidance (TGN 02/21) Assessing landscape value outside national designations, February 2021
- 1.8 This work has been informed by desktop studies and a site visit carried out by a chartered landscape architect during May 2021.

2 LOCATION AND BASELINE CONTEXT

2.1 The sites and their local context are illustrated on the Ordnance Survey map extract and aerial photograph below.



HBA Figure 1 - Site Context (Ordnance Survey Mapping from Bing.com



HBA Figure 2 - Site Location (aerial photographs from Google Earth)

- 2.2 Photographs of the sites from public viewpoints are provided on photosheets at Appendix HBA 1.
- 2.3 A broad description of the location and landscape and visual baseline conditions for each site is set out below followed by an overview of the wider landscape context:

Tring

2.4 The three sites all lie on the eastern side of Tring, a market town in the north west of the borough of Dacorum that is surrounded by the Chilterns Area of Outstanding Natural Beauty (AONB). The town lies in a gap in the Chiltern Hills where two ancient trackways, the Icknield Way and Akeman Street (Roman road) meet. Tring was mentioned in the Domesday Book but its existence can be traced back to prehistoric times.

Site TR01 Dunsley Farm

- 2.5 Site TR01 covers an area of 37.25 hectares of predominantly small-scale arable and pastoral farmland, bounded by mature hedgerows and trees. The field pattern is relatively intact, historic Ordnance Survey mapping indicating that this has changed little over the past 100 years.
- 2.6 At the western side of the site, there is an industrial yard and buildings, including Tring Brewery. These are generally well contained by hedgerows.
- 2.7 The land appears generally level but has a gentle fall from south to north.
- 2.8 The site abuts London Road (B4635) to the south and south west, a main approach to the town from the A41 trunk road. The junction with the A41 lies just south of the site. The site frontage to London Road is generally well vegetated with mature trees, hedgerow and scrub that provides a degree of containment but also allows for glimpsed views of the fields of the site.
- 2.9 The Grade II listed registered historic park and garden of Tring Park lies beyond London Road and opposite the site to the south west. The registered park listing also includes a number of listed buildings, including London Lodge to Tring Park, located around 70m south of site TR01.
- 2.10 To the north west, the site adjoins sports fields and recreational facilities at Tring Cricket Club, whilst back gardens to housing on Station Road and Damask Lane adjoin the eastern half of the site's northern boundary. All are marked by hedges or well vegetated boundaries with the site.
- 2.11 Cow Lane adjoins the eastern site boundary, with sports pitches associated with Tring Rugby and Football Clubs located beyond Cow Lane to the east.
- 2.12 The Chilterns AONB boundary adjoins the site along Cow Lane and London Road.
- 2.13 A public footpath runs north-south through the site, linking London Road to Damask Lane and Station Road beyond. The footpath allows public views out of the site to the wider setting and distant backdrop of the Chilterns Hills.
- 2.14 The site forms part of the countryside edge and buffer to the settlement of Tring in long distance views from elevated locations in the Chilterns AONB, including from the

- Ridgeway National Trail and Icknield Way near Pitstone Hill and from the Icknield Way Trail through Tring Park.
- 2.15 The site is in part a Local Wildlife Site on its eastern side.

Site TR02 New Mill

- 2.16 Site TR02 covers an area of 14.70 hectares, spanning two fields of open pastoral farmland, divided by a hedgerow and trees. The landform is gently rolling with a localised rounded mound in the northern part of the site. The boundary to the Chilterns AONB steps away from Bulbourne Road to the north opposite the site. Although Site TR02 does not lie within or adjoining the AONB, it still forms part of its setting.
- 2.17 To the north, the site adjoins the rear gardens to properties on the southern side of Bulbourne Road (B488) and also abuts a short stretch of Bulbourne Road in the northern corner.
- 2.18 To the east, the site adjoins neighbouring open and relatively flat, agricultural land at Grove Farm, this boundary being marked by a hedgerow. The main farmstead of Groves Farm is located further north off of Bulbourne Road.
- 2.19 To the south and east, the site boundary to TRO2 adjoins properties on Netherby Close, Hollyfield Close, Grove Road and Wingrave Road at the eastern edge of Tring. Boundary treatments could not be inspected but look to be a range of hedges with sporadic trees, garden vegetation and fencing from available aerial photography.
- 2.20 There is no public access on to the site.
- 2.21 The nearest heritage assets are the Grade II listed New Mill Tring Baptist Church with Adjoining Schoolroom and 2 Cottages, in Graveyard, approximately 230m south west of the site but is completely screened from it by buildings to either side of the B488.
- 2.22 The site is visible but generally difficult to readily discern, in long distance views from elevated views in the Chilterns AONB to the east and north-east, including at Ivinghoe Beacon and from the Ridgeway National Trail and Icknield Way near Pitstone Hill.

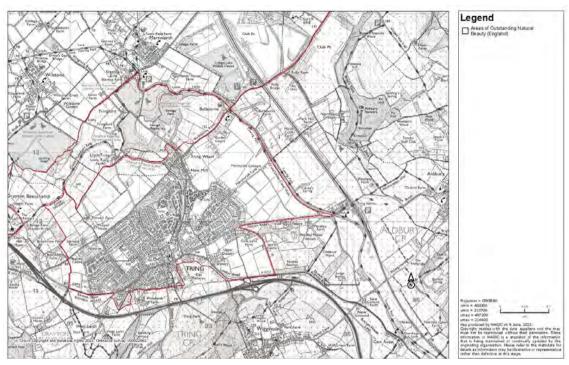
Site TR03 East of Tring

- 2.23 Sites TR02 New Mill, and TR03 East of Tring, are adjoining sites but are addressed separately in the emerging strategy.
- 2.24 Site TR03 is the larger of the two sites, covering an area of 119.11 hectares of gently undulating arable farmland adjoining the Chilterns AONB on three sides. The farmland is divided by hedgerows and intermittent trees and creates a large open patchwork of fields that feel rural, distinct and separate to the built area of Tring.
- 2.25 The landform of the site is gently undulating with an overall fall to the south-west and a slightly raised and mounded landform in the northwest corner.
- 2.26 Site TR03 extends from the eastern settlement edge of Tring and rear gardens to housing on Grove Road and Hollyfield Close in the west to the Grand Union Canal in the east. Although the Grand Union Canal adjoins the site, it is set in deep cuttings and therefore has a limited visual connection with the site. Beyond the Grand Union Canal, the landscape of the AONB includes a number of reservoirs in the foothills, the land

- then quite steeply rising to the Chiltern Hills that provide a dramatic wider setting to this edge of Tring.
- 2.27 Bulbourne Road (B488) lies adjacent to the north-western site boundary, with the site boundary excluding Tring Garden Centre which lies in the northern third of the northwestern boundary and is accessed from Bulbourne Road.
- 2.28 Station Road forms the southern boundary to the site and provides a busy but attractive tree-lined road. Tring Station lies some 400m to the southeast of the site on Station Road. South of Station Road, the AONB landscape is generally well-wooded, with Pendley Manor Hotel lying opposite the site but nestled in woodland.
- 2.29 The site is bisected by Marshcroft Lane which runs southwest north east through the site and crosses the canal on a Grade II listed bridge Grand Union Canal Bridge. Marshcroft Lane is an attractive hedge-lined rural green lane that appears well-used as a recreational route to the wider footpath network within the AONB.
- 2.30 The Grand Union Canal has public footpaths on either side, mostly following the tow path and set well below deep cutting slopes, allowing limited visibility and connectivity to the site. Through the southern section of the site, the footpath lies at the top of the steep embankment to the canal and follows the south eastern boundary to site TR03. There are open views from the footpath looking across the southern half of the site, but generally curtailed by the hedgerow pattern. The Chiltern Hills to the south of the site, broadly from Wigginton to Wendover, form a distant backdrop and connection to the wider setting. There is likely to be intervisibility from the main parts of the site (non-accessible to the public) to the wider Chiltern Hills and High Scarp.
- 2.31 The site forms a noticeable part of the countryside edge and buffer to the settlement of Tring in long distance views from elevated locations in the Chilterns AONB, including from the Ridgeway National Trail and Icknield Way near Pitstone Hill and from the Icknield Way Trail through Tring Park. Views from Ivinghoe Beacon and the high scarp tend to be more expansive with Tring at the periphery of the view but nonetheless, Site TR03 forms a part of the panorama.
- 2.32 The closest listed buildings to site TR03 are the Grade II listed Grove Farm Cottages approximately 180m from the site's boundary.

Landscape Designations

- 2.33 Whilst not a designation of landscape or visual quality, all of the sites are Green Belt. The essential quality of the Green Belt is its openness. In the particular circumstances of the sites around Tring, the Green Belt provides a permanent open buffer between the settlement of Tring and the Chilterns Area of Outstanding Natural Beauty (AONB).
- 2.34 The sites lie outside of but immediately adjoin the Chilterns AONB, a landscape of national importance, designated to conserve and enhance the natural beauty of the landscape.
- 2.35 The Chilterns AONB boundary in relation to the sites is indicated on the plan below:



HBA Figure 3 - Mapping (from Magic.gov.uk) indicating the Chilterns AONB boundary

- 2.36 The Chilterns AONB Management Plan 2019-2024 defines the special qualities of the AONB and sets out the vision and policies for the future management of the AONB, including development within its setting. One of the special qualities of the Chilterns AONB of relevance is the "Panoramic views from and across the escarpment interwoven with intimate dipslope valleys and rolling fields".
- 2.37 Strategic Objectives for development are provided in the AONB Management Plan and include:
 - DO1 Ensure planning decisions put the conservation and enhancement of the AONB first.
- 2.38 To achieve the strategic objectives, development policies are provided in the AONB Management Plan, including:
 - DP4 In the setting of the AONB, take full account of whether proposals harm the AONB. For example, development of land visible in panoramic views from the Chilterns escarpment, or which generates traffic in or travelling across the AONB, or which increases water abstraction from the chalk aquifer, thereby reducing flow in chalk streams.
- 2.39 In this regard, the Chilterns Conservation Board has published a Position Statement, 'Development affecting the setting of the Chilterns AONB Adopted June 2011 (Rev 1)'. This provides guidance to local planning authorities and other interested parties with regard to considering the impacts on the AONB of development within its setting.
- 2.40 The Position Statement notes at Paragraph 14 that "the setting of the Chilterns AONB does not have a geographical border. The location, scale, materials or design of a proposed development or land management activity will determine whether it affects the natural beauty and special qualities of the AONB. A very large development may

have an impact even if some considerable distance from the AONB boundary. However, the distance away from the AONB will be a material factor in forming a decision on any proposals, in that the further away a development is from the AONB boundary the more the impact is likely to be reduced."

- 2.41 Examples of adverse impacts are given at paragraph 15, including:
 - Blocking or interference of views out of the AONB particularly from public viewpoints or rights of way;
 - Blocking or interference of views of the AONB from public viewpoints or rights of way outside the AONB;
 - Loss of tranquillity through the introduction of lighting, noise, or traffic movement;
 - Introduction of significant or abrupt changes to landscape character particularly where they are originally of a similar character to the AONB;
 - Change of use of land that is of sufficient scale to cause harm to landscape character.
- 2.42 A number of nature conservation designations surround and extend across parts of the site as described further below.

Landscape Character

- 2.43 At a regional scale, the site and surroundings lie within National Character Area (NCA) 110 Chilterns, as defined by Natural England. The Chilterns NCA 110 is an extensively wooded and farmed landscape underlain by chalk bedrock that rises up from the London Basin to form a north-west facing escarpment offering long views over the adjacent vales. From the vales, the River Thames breaches the escarpment in the south at the Goring
- 2.44 Some of the key characteristics of NCA 110 that are relevant to the overall character of the landscape surrounding the site are:
 - The chalk plateau is incised by parallel branching valleys gently shelving to the south-east into the London Basin.
 - Within the Chilterns, views are enclosed within branching valleys, sunken routeways and extensive woodland and hedgerow-enclosed fields. There are hidden, tranquil pockets along single track lanes and rights of way.
 - The Chilterns are one of the most wooded lowland landscapes in England. The area is particularly renowned for its extensive native beechwoods, several of which are designated as part of the Chilterns Beechwoods Special Area of Conservation (SAC). Other distinctive features include rare box woods, 'hanging' woods on steep slopes and rare yew woods, including Hartslock Wood SAC.
 - Pre-18th-century fields defined by ancient, often sinuous hedged boundaries are scattered throughout, including co-axial fields. Parliamentary enclosure fields are limited. Large modern fields, usually with ancient boundaries, cover the better agricultural land, most notably in the north-east.
 - Remnants of various historic land use types can combine rich and diverse habitats and archaeology. Many key places are publicly accessible, including Registered

- Parks and Gardens, historic downland and common land. Traditional flood plain landscapes and orchards are the most restricted in extent. Historic routeways, hedged boundaries and watercourses provide connectivity.
- Nucleated settlements of medieval origin and land farmed since prehistory are found alongside watercourses and springs in the through-valleys and at the foot of the scarp. Elsewhere, dispersed farmsteads dating from the medieval period and mid-19th-century development around commons are characteristic of the plateau.
- Numerous parkland landscapes define large, historic estates. Designs by Humphry Repton and Lancelot 'Capability' Brown are represented, and the houses, follies and wooded features provide local landmarks.
- Extensive rights of way, commons, open access downland, woodland and some parklands provide access to the countryside. The Thames Path, the Ridgeway and the Grand Union Canal are high-profile recreation routes; locally promoted routes include the Chilterns Cycleway. Private leisure land uses, including golf courses and horse paddocks, are common near urban centres.
- 2.45 At a district level, all three sites fall within Landscape Character Area 114 Tring Gap Foothills as described in the Dacorum Landscape Character Assessment. The Character Area Description for LCA 114 is provided at HBA Appendix 2, with key points summarised below.
- 2.46 The Tring Gap Foothills LCA114 is described as a transitional landscape between the low lying Aylesbury Vale and the Chilterns. Key characteristics are summarised as:
 - Views to the Chilterns escarpment
 - Framing and containment by wooded scarp slopes
 - Arterial transport corridor including; West Coast main line, A41, Grand Union Canal and Akeman Street
 - Mixed open farmland
 - Parkland landscapes at Tring Park and Pendley Manor
 - Urban fringe influences around Tring including; residential sports pitches and a garden centre
 - Recreational routes including the Grand Union Canal Walk and the Ridgeway
- 2.47 Distinctive features identified for LCA 114 include:
 - Brick and flint estate walling and Victorian lodges to Tring Park
 - Tring Park Mansion
 - Tring Park grasslands
 - Disused Wendover Arm of Grand Union Canal
- 2.48 The character description for LCA 114 notes that the majority of the area has a historic field pattern and that to the east of Tring, there are strong geometric shapes which date from the drainage of the area and the construction of the canal and railway.

- 2.49 Under 'condition', the impact of built development and of land-use change is considered to be "moderate". With regard to 'Strength of Character', the impact of landform, land cover and historic pattern are all ranked as "apparent" whilst 'Sense of enclosure' is identified as "partial".
- 2.50 The Strategy and Guidelines for Managing Change in LCA 114 is to 'Improve and Conserve'. This includes:
 - Strengthening the setting of the scarp slopes by enhancing the landscape structure of the foothills by promotion of the removal/screening of eyesores and the management/reintroduction of boundary features to reduce the scale and openness.
 - Support a strategy to limit the impact of built development including Tring upon the area. Ensure that development both in the area or adjacent to it are integrated through the use of native tree and shrub species and the creation of hedging and/or planting to the perimeter
 - Conserve and enhance the distinctive character of settlements and individual buildings ...
 - Encourage the retention of the existing pattern of hedges...
 - Promote awareness and consideration of the setting of the AONB, and views to and from it, when considering development and land use change proposals on sites adjacent to the AONB.
- 2.51 The Dacorum Borough Landscape Sensitivity Study provides a finer-grain consideration of the landscape value, susceptibility and sensitivity of land parcels at the fringes of settlements. The findings of the Landscape Sensitivity Study are considered below in our review of evidence base documents.

Landscape and visual detractors

- 2.52 Overall, there are relatively few visual detractors within the sites.
- 2.53 The A41 trunk road is an auditory detractor but is for the most part visually screened from the nearest site, TR01. Other highways paraphernalia such as signage and lighting are noticeable around the A41 junction with the London Road.
- 2.54 At the north-western side of TR01, the Tring Brewery and other commercial premises exert built influence and include some untidy and unkempt storage areas that can be noted from London Road.
- 2.55 Site TRO3 has few notable detractors when considered from the nearby roads and public footpaths. Traffic noise, lighting and movement from Bulbourne Road is likely to exert a negative influence on the northern section of the site.
- 2.56 Site TR02 has no public access and therefore detractors are difficult to ascertain, but the nearby settlement edge and likely auditory influence of the Bulbourne Road (B488) are potential detractors.

Landscape and visual attributes

2.57 The simple but distinctive pattern of fields and hedgerows with intermittent trees (many of which are over 100 years old) are strong visual attributes of sites TR01 and TR03.

- 2.58 Site TR01 provides an attractive green setting and countryside foreground on approach to Tring from the A41 south.
- 2.59 The public footpaths through Sites TR01 and TR03, as well as Marshcroft Lane which separates Site TR03, provide recreational value and offer attractive and relatively tranquil walking routes.
- 2.60 Station Road, although an auditory detractor, is an attractive tree lined road with a positive wooded character.
- 2.61 Site TRO2 has no public access and therefore positive landscape and visual features have not been able to be inspected/considered.
- 2.62 Views to the distant backdrop of the Chilterns are an attractive feature of all sites and provide a distinctive sense of place and strong relationship to the wider setting.

3 LANDSCAPE PLANNING POLICY AND EMERGING POLICY

National Planning Policy Framework (NPPF) (Revised February 2019)

- 3.1 The NPPF sets out the Government's national planning policy for England. The Framework is a material consideration in determining planning applications (Paragraph 2) and should be read as a whole (including its footnotes and annexes) (Paragraph 3). Its overall thrust is to promote sustainable development (Paragraph 7).
- 3.2 Paragraph 8 states that "the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supporting ways (so that opportunities can be taken to secure net gains across each of the different objectives).
 - "a) an economic objective:..."
 - "b) a social objective:" ...
 - "c) an environmental objective:" This is described as "to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy".
- 3.3 Paragraph 127 of the Framework states: "Planning policies and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)".
- 3.4 Paragraph 130 states that "permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions."
- 3.5 In section 15, the NPPF deals with conserving and enhancing the natural environment noting at paragraph 170 that the planning system should contribute to, and enhance, the natural and local environment by
- 3.6 " a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

- 3.7 and by
- 3.8 "b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;"
- 3.9 Paragraph 171 requires that "distinctions should be made between the hierarchy of international, national and locally designated sites so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make ...". The importance of statutorily designated landscape at the national level is reaffirmed in paragraph 172 of the NPPF which confirms that "great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty...".

Local Planning Policies and emerging policies

3.10 Local policies and emerging policies relating to landscape and visual issues and sites TR01, TR02 and TR03 are outlined below.

Current Local Plan

- 3.11 The Dacorum Local Plan 1991-2011 (adopted 2004) (as amended by the Core Strategy and Site Allocations DPD) forms part of the development plan for the borough alongside the adopted Core Strategy (2013) and the Site Allocations DPD (2017).
- 3.12 The Core Strategy sets out the current vision for the borough in 2031 and provides strategic objectives for delivering the vision
- 3.13 Chapter 22 of the Core Strategy provides a place strategy for Tring. Under 'Delivering the Visions', paragraph 22.6 notes that "new development will maintain the distinctive compact nature of this market town, particularly the historic High Street and 'Tring Triangle', and its countryside setting, supporting the maintenance of viable farmland and protecting landscape features, such as Tring Park, the Wendover Arm of the Grand Union Canal and Tring Reservoirs. Views along the High Street and from Icknield Way will be safeguarded'.
- 3.14 Core Strategy Policy CS24: The Chilterns Area of Outstanding Natural Beauty, requires that:
 - The special qualities of the Chilterns Area of Outstanding Natural Beauty will be conserved.
 - The scarp slope will be protected from development that would have a negative impact upon its skyline.
 - Development will have regard to the policies and actions set out in the Chilterns Conservation Board's Management Plan and support the principles set out within the Chilterns Buildings Design Guide and associated technical notes.
- 3.15 Core Strategy Policy CS25: Landscape Character, requires that:
 - All development will help conserve and enhance Dacorum's natural and historic landscape.

Proposals will be assessed for their impact on landscape features to ensure that they conserve or improve the prevailing landscape quality, character and condition and take full account of the Dacorum Landscape Character Assessment, Historic Landscape Characterisation and advice contained within the Hertfordshire Historic Environment Record.

Dacorum Local Plan (2020-2038) Emerging Strategy for Growth

- 3.16 The emerging strategy for the new Local Plan proposes that much of the countryside adjoining the eastern settlement boundary to Tring is released from Green Belt and allocated for major development, with a strategy to deliver 2200 dwellings, primary and secondary schools and employment use on the three sites TR01, TR02 and TR03.
- 3.17 Delivery Strategies have been prepared that set out how growth and development will be managed in each area of the Borough. These identify key delivery requirements and set out policies for each growth area.
- 3.18 Emerging Policy SP23 Delivering Growth in Tring identifies how growth could be distributed across Tring:
 - TR01 Dunsley Farm

5.4ha of new employment land (equivalent to 21,600 sq.m of floorspace); and A primary school. Around 400 dwellings, with public open space.

TR02 New Mill

Around 1,400 dwellings, with public open space

TR03 East of Tring

Neighbourhood centre; Sports/community hub; Primary school; and Secondary school.

- 3.19 Paragraph 23.162 identifies that the expansion of Tring to the east represents "the single largest combined allocations in the town and one of the largest growth areas in the Borough" and that "growth will come forward over a long period of time, across multiple sites and in a sensitive location which requires a cohesive approach which binds these elements together".
- 3.20 Key objectives for the proposed development around Tring include:
 - "create new comprehensively planned neighbourhoods as mixed use urban extensions to the south and east of the town;
 - integrate new development with the existing built-up area of Tring in terms of sustainable transport connections, open space and urban grain / morphology;
 - provide significant ecological and open space buffers to the GUC and the hamlet of Bulbourne, with a connecting corridor of open space to Grove Road, and a buffer of open space along Station Road;
 - provide open space / green corridors linking the development with adjoining recreational open space at Tring Park Cricket Club and Tring Rugby and Football Clubs and open countryside to the south;
 - protect and enhance the existing wildlife site at Cow Farm and/or provide for its

translocation;

- take account of the Chilterns AONB setting, including long-distance views of the sites from the Chiltern Hills to the south and east in respect of the site layout, design and landscaping;
- include screen planting along London Road and ensure appropriate buffer / noise mitigation to the A41."
- 3.21 Emerging Policy SP24 Delivering Growth in East Tring and Policy SP25 Delivering Growth at South East Tring provide site-specific policy requirements for sites TR01, TR02 and TR03. The policy wording is essentially repeated but with reference made to the different site names:
 - The Council will bring forward a series of comprehensively planned urban extension to the East of Tring in accordance with a Masterplan led approach and based on the Town and Country Planning Association (TCPA) Garden City Principles. The Masterplan will be prepared by the Council and adopted as an SPD but be prepared in collaboration with key partners and landowners and be subject to community and stakeholder involvement.
 - The Masterplan will be supported by Development Parcel Design Codes which will inform planning applications. The Masterplan (and other supporting documents) will set out how the south and east Tring extensions will deliver the following:
 - 1. distinctive, sustainable, high quality, successful new communities with a best approach to planning, design and management of the built and public realm;
 - 2. achieves best practice in design to build in sustainable lifestyles, such as walkable neighbourhoods with local services and employment opportunities throughout the development;
 - 3. beautifully and imaginatively designed homes, combining the best of town and country to create healthy communities;
 - 4. a comprehensive green infrastructure network and net biodiversity gains which enhances the environment. The development will deliver local and strategic green infrastructure designed as accessible multifunctional space and maximise benefits such as wildlife, recreation, water management and includes opportunities to grow food:
 - 5. promote sustainable travel choices by delivering an integrated and accessible development with walking, cycling and public transport prioritised as well as the transport outcomes detailed in the Berkhamsted and Tring Sustainable Transport Strategy;
 - 6. an exemplar in sustainable living with a particular focus on reducing energy consumption as well as generating energy from renewable and low carbon sources and delivering other significant environmental enhancement to ensure climate resilience;
 - 7. deliver the infrastructure requirements set out in the Dacorum Local Plan Infrastructure Delivery Plan for Tring; and
 - 8. deliver all other site specific requirements set out in in the proposed allocation(s)

Tr02 and TR03.

- The Council will prepare the Masterplan for East Tring Growth Area and this will be adopted as an SPD. The Masterplan will be supported by Development Parcel Design Codes which will inform subsequent planning applications. These will be prepared in collaboration with key partners and landowners and be supported by community and stakeholder involvement.
- 3.22 Tring sites TR01, TR02 and TR03 are outlined in more detail at page 315 321 of the Emerging Strategy (refer to *Appendix HBA 3*). The proposed allocation information and requirements for each site (in so far as they are relevant to landscape and visual matters) are summarised below:

TR01 Dunsley Farm

3.23 Allocated for:

- Around 400 new homes (including provision for older people).
- A General Employment Area in the west of the site fronting London Road, consisting of 5.4 ha of new employment land and 2 ha of land already partly in industrial/commercial use (including Tring Brewery), which has scope for further small-scale employment development.
- The employment development should consist mainly of units of under around 2,000 sq. metres.
- A supermarket will be encouraged within the General Employment Area, but only if a supermarket cannot be delivered in Tring town centre on the High Street/Brook Street site (Growth Area Tr06) and it would not have a significant adverse impact on the town centre.
- A new fire and rescue station to replace the existing facility on Growth Area Tr06 would be another acceptable use within the General Employment Area.
- A new primary school (3ha).

3.24 Site specific requirements include:

- <u>Urban Design Principles</u>: Design codes/masterplans will be developed alongside the preparation of any outline planning application and agreed by means of condition.
- Access, Highways and Sustainable Transport: Vehicular access to be provided via London Road and Cow Lane. Primary access to employment site to be provided separately via London Road.
- <u>Social and community</u>: Provide three hectares of land for and deliver a new 2FE primary school.
- Environmental Health: Investigate potential noise, air and light pollution impacts arising from the A41 and A4251 and identify appropriate mitigation measures as necessary.
- <u>Landscape Considerations</u>: Development will need to take account of and/or mitigate the following landscape sensitivities:

- relationship and views from and toward the Chilterns AONB surrounding the parcel and important
- o views such as from the Ivinghoe Beacon;
- the relationship to the development pattern of Tring to the north and the sports facilities and light industrial yard to the west;
- o the localised intervisibility with the open landscape and fields;
- o urbanising influences of the A41 and London Road;
- the setting of the historic designed landscape of Tring Park, a grade II Registered Historic Park and Garden adjacent to the south-western boundary of the parcel;
- o the existing and historic field boundary pattern; and
- o the recreational value of the PRoW.
- <u>Biodiversity and Green Infrastructure:</u> As part of delivering a net gain in biodiversity, investigate the existing Local Wildlife Site Cow Lane Farm Meadows for its existing and future potential as a strategic wildlife corridor.
- <u>Historic, Environment and Cultural Heritage:</u> Ensure development of the site protects and where possible enhances the setting of nearby heritage assets, including Tring Park (Registered Park and Garden), Pendley Manor, Dunsley Bungalow and its associated cartshed and piggery, and Cow Lane Lodge to Pendley Manor (all Grade II listed).

TR02 New Mill

3.25 Allocated for:

 Around 400 new homes (including provision for older people), subject to masterplanning; and Public open space

3.26 Site specific requirements include:

- <u>Urban Design Principles:</u> Design codes will be developed alongside the preparation of any outline planning application and agreed by means of condition. The allocations New Mill and East of Tring should be planned together, preferably as a joint plan or as a minimum through closely aligned masterplans taking an integrated approach to the joint site area. Ensure high quality GI and sustainable transport linkages are provided with the adjacent allocation "East of Tring", including to the new community hub, local centre and primary and secondary schools.
- Access, Highways and Sustainable Transport: Primary highway access to be provided via Bulbourne Road. Investigate secondary highway access onto Grove Road.
- <u>Environmental Health:</u> Undertake contaminated land investigations to ensure that the land is safe and suitable for the intended use.
- <u>Landscape Considerations:</u> Development will need to take account of and/or mitigate the following landscape sensitivities:

- views of and from the Chilterns AONB and from locations such as Ivinghoe Beacon within the AONB;
- screening of urbanising features within views such as the silos north of the parcel;
- o the established vegetated buffers surrounding the parcel; and
- o the existing development pattern along Grove Road and Netherby Close.
- <u>Biodiversity and Green Infrastructure:</u> As part of delivering a net gain in biodiversity, utilise new landscape mitigation measures and structure to develop new green infrastructure corridors and connect with other corridors in the area, including those proposed at East of Tring, such as the community hub spine.

TRO3 East of Tring

3.27 Allocated for:

- Around 1,400 new homes (including provision for older people), subject to masterplanning.
- A new neighbourhood centre to include a sports/community hub.
- A new primary school (3ha).
- A new secondary school (13ha).
- Public open space.

3.28 Site specific requirements include:

- <u>Urban Design Principles:</u> Design codes will be developed alongside the preparation of any outline planning application and agreed by means of condition. The site will be brought forward with a masterplan showing a comprehensive phasing programme for development to be prepared in consort with the local planning authority. The allocations Tr03 East of Tring and Tr02 New Mill should be planned together, preferably as a joint plan or as a minimum through closely aligned masterplans taking an integrated approach to the joint site area. Ensure high quality green and blue infrastructure and sustainable transport linkages are provided with the adjacent allocation Tr02, including to the new community hub, local centre and primary and secondary schools.
- Access, Highways and Sustainable Transport: Main vehicular access from Station Road and Bulbourne Road. A new link road (30mph) to be provided connecting Bulbourne road and Station Road.
- <u>Social and community:</u> Provide three hectares of land for and contribute towards the delivery of a new 3FE primary school and associated playing fields. Provide 13 hectares of land for and contribute towards the delivery of a new 6FE secondary school and associated playing fields. Deliver a new sports hub to serve existing and future residents of Tring and the surrounding area.
- <u>Environmental Health:</u> Consideration should be given to Controlled Waters as a receptor to potential ground contamination. Undertake contaminated land investigations to ensure that the land is safe and suitable for the intended use.

- <u>Landscape Considerations:</u> Development will need to take account of and/or mitigate the following landscape sensitivities:
 - o the intervisibility with the wider landscape due to the elevated areas of the Chilterns AONB; namely prominent locations such as the Ridgeway National Trail, Ivinghoe Beacon and associated downland and chalk grassland, areas south of the parcel and along the AONB boundary;
 - the historic field pattern; areas of complex topography with associated higher levels of intervisibility;
 - o well established internal and external hedgerows;
 - a strong scenic quality from the agricultural landscape and enclosure of the parcel;
 - o the intact nature of areas of the parcel with few external influences; and
 - o tree lined skylines;
- Biodiversity and Green Infrastructure: As part of delivering a net gain in biodiversity, create a new linear park along the entire north-eastern boundary of the site, to create a new green infrastructure and biodiversity corridor that runs parallel to the Grand Union Canal. Create a new green corridor linking the new woodland area to the north east with the existing built-up area of Tring along Marchcroft Lane to the adjacent allocation "New Mill".
- <u>Historic, Environment and Cultural Heritage:</u> Development must conserve and where possible enhance the setting of a number of heritage assets in the area, including Pendley Manor, its stable and lodge, the canal bridge at Marshcroft Lane (all Grade II), and Marchcroft Lane (roman road). Development of the site should respect the setting and separate identify of Bulbourne to the north, which contains a number of designated and non-designated heritage assets.

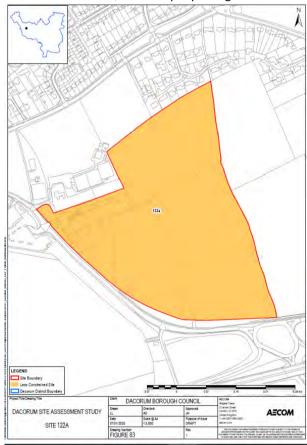
4 CRITIQUE/REVIEW OF LANDSCAPE EVIDENCE BASE

- 4.1 The evidence base to the emerging strategy includes a number of documents relating to landscape and visual matters, site selection and Green Belt. We provide a broad review of this evidence alongside our own critique of the evidence findings.
 - Site Assessment Study for Dacorum Borough Council, Volumes 1 4, January 2020
- 4.2 This Study describes the methodology and phased assessment approach that was carried out to select sites for allocation. This process reduced an initial 144 sites to 79 at 'Phase 1', with a subsequent detailed 'Phase 2' assessment of the 79 sites resulting in 46 sites being considered potentially suitable for allocation, of which 34 had major constraints (including TR01 and TR03) and 12 minor constraints (including TR02).
- 4.3 15 of the 46 identified sites were recommended for boundary amendments from the original extents proposed, including Sites TR01 (Site 122 and 122a in the Study).
- 4.4 The Phase 2 assessment addressed 13 criteria including Landscape and Visual Impacts and the findings of the Green Belts Assessments (reviewed separately below). The

Phase 2 findings for each site are outlined in the table below with extracts for each site included in HBA Appendix 4.

TR01 Dunsley Farm (Site 122/122a in the Site Assessment Study)

4.5 Most notably, the Site Assessment Study concludes that only a reduced size site of 16.4 hectares on the western portion of Site TR01 is potentially suitable for allocation (with major constraints). This also reflects the findings of the Green Belt Assessments, that the development of TR01 "may partially compromise the ability of the wider Green Belt to meet its purposes". The emerging strategy for Dacorum does not follow this recommendation, instead proposing to allocate the full 37.25 hectare site.



HBA Figure 4 - Site 122A (Reduced size Site TR01 as recommended in the Site Assessment Study

- 4.6 In terms of Landscape and Visual Impact, the Phase 2 Assessment finds that:
 - "The site is not within the Chilterns AONB but may impact the setting of the Chilterns AONB due to its close proximity. The site is within LCA 114 of the DLCA; the condition of the LCA is described as moderate, and the strength of character of the LCA is described as moderate. The site has a gentle fall from south to north and comprises mainly small-scale mixed farmland, with fields bounded by hedgerows and intermittent trees. The site is defined by London Road to the south, beyond which is the A41. The main built-up area of Tring is to the north. A supermarket is located to the west of the site. A scarp of the AONB is to the south of the A41, across which the Ridgeway National Trail passes. A public footpath crosses the site. Overall, the site is judged to perform reasonably on this criterion but with major constraints as a result of the potential for impacts on the setting of the AONB."

- 4.7 Environmental designations are also flagged up as major constraints: "Local Wildlife Site intersects the bulk of the eastern half of the site, and this is a fundamental constraint to development of this area. The pattern of land designated as Local Wildlife Site also cuts off some undesignated land to its east from the rest (i.e. the western part) of the site".
- 4.8 The overall site conclusion comments include that the site's "most significant constraints are flood risk, Local Wildlife Site across half of the site, Green Belt and the setting of the AONB, as well as environmental features. Other than these, site performs relatively well. Given that the Local Wildlife Site is the most fundamental of these constraints and is not able to be mitigated, it is recommended that site boundaries are amended to form a new site 122a that includes only the western half of the site, thus excluding the Local Wildlife Site. While it is noted that there is some land in the east of the original site that is not within the wildlife designation, the necessary boundary amendment would act to cut this land off from the rest of the site and thus development in this location would form isolated new houses in the countryside away from the settlement edge, which is resisted by national policy. The allocation of 122a could be offset by compensatory improvements to that part of the site not allocated but remaining within the Green Belt and in the same ownership, in line with NPPF paragraph 138. Site 122a is therefore considered to be potentially suitable for allocation with major constraints."
- 4.9 TRO2 New Mill (Site 132 in the Site Assessment Study)
- 4.10 The Landscape and Visual Impact Summary is considered to aptly summarise the overall landscape and visual issues relating to this site:
 - "The site is not within the Chilterns AONB but may impact the setting of the Chilterns AONB due to its proximity. However the majority of the developable area of the site is relatively limited in AONB impact, and indeed the northern half of the site, physically closest to the AONB, slopes down away from it in parts. The site is within LCA 114 of the DLCA; the condition of the LCA is described as moderate, and the strength of character of the LCA is described as moderate. The site has a gently rolling landform and comprises two pastoral fields between residential land uses adjacent to the B488 and Grove Road. The fields are divided by a hedgerow with intermittent trees, and have a well-defined linear belt of trees along their north-eastern boundary. The other boundaries to the fields are made up of the Tring settlement edge. Overall, the site is judged to perform reasonably on this criterion but with major constraints as a result of the potential for impacts on the setting of the AONB"
- 4.11 The Phase 2 Assessment concludes that Site performs relatively poorly as Green Belt and lies within setting of AONB, "but in spatial terms, the majority of the site's developable area is relatively limited in terms of its visual relationship with the AONB. Its performance across other criteria is strong, and in combination, this indicates the site is considered potentially suitable for allocation with minor constraints."
- 4.12 We would generally agree with the summarised findings of the Stage 2 Assessment for TR02 New Mill (Site 132 in the Site Assessment Study).
- 4.13 TRO3 Land East of Tring (Site 124 in the Site Assessment Study)

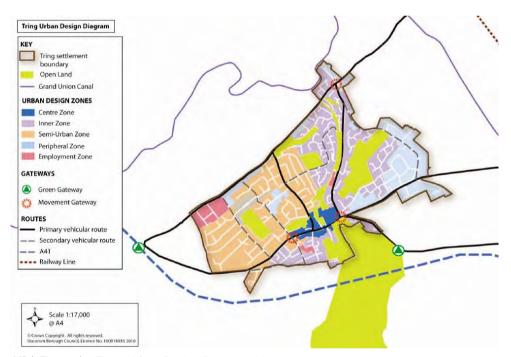
- 4.14 A key issue recorded in the Phase 2 Assessment is the overall conclusions of the Dacorum Green Belt Assessments that the allocation of this site "would compromise the ability of the wider Green Belt to meet its purposes exclude from further consideration". The Site Assessment Study also records that the site "performs relatively poorly" on heritage, landscape (including AONB setting) and agricultural land quality" but subsequently disregards its Green Belt constraints on the basis of this being outweighed by "other criteria". The overall site conclusion considers that "the scale of the site and ability to deliver significant growth, i.e. regeneration and economic benefits, are further major advantages". As such, the site is considered potentially suitable for allocation but with major constraints.
- 4.15 We would note that no clear methodology is provided to demonstrate how the many environmental constraints are balanced against economic considerations to arrive at this overall weighting.
- 4.16 In terms of Landscape and Visual Impact, the Assessment notes that "the site is not within the Chilterns AONB but may impact the setting of the Chilterns AONB due to its close proximity. The site is within LCA 114 of the DLCA; the condition of the LCA is described as moderate, and the strength of character of the LCA is described as moderate. The site is gently undulating and covers arable farmland between the northeast edge of Tring and the Grand Union Canal. The farmland is divided by hedgerows and intermittent trees. The site is not fully contiguous with Tring's settlement pattern. The Grand Union Canal is lined by a dense belt of mature trees, and has public footpaths along each side. Overall, the site is judged to perform reasonably on this criterion but with major constraints as a result of the potential for impacts on the setting of the AONB and Grand Union Canal and the vegetation patterns across the site".
- 4.17 In our opinion this is a somewhat understated landscape and visual summary given that the Dacorum Landscape Sensitivity Study assesses the site to have Moderate-High landscape susceptibility to change arising from residential and mixed-use development with an overall Moderate-High landscape sensitivity.
- 4.18 We consider that the Site Assessment Study highlights a number of important landscape and visual and green belt constraints that demonstrate the unsuitability of the majority of Site TR03 (Site 124) for allocation and future development and should have weighed more heavily in the balance against other criteria.

Urban Design Assessments Update Paper July 2011

- 4.19 The Urban Design Assessments Update Paper forms part of the evidence base to the Local Plan. The Urban Design Assessments were originally published in 2006 and assess the design criteria which make up the character of each of the towns and large villages in Dacorum, including Tring. Their purpose was to inform the urban design policies for the Local Development Framework and they also provided the basis for vision diagrams and urban design policy in the Core Strategy.
- 4.20 The Update Paper made some amendments to the Urban Design Assessments in order to address some identified inconsistencies and provide a more coordinated, coherent and simplified approach. This included providing updated versions of the Urban Design Diagrams indicating the key urban design characteristics of Tring, notably to identify different types of routes and gateways.



HBA Figure 5 - Tring Urban Design Diagram 2006



HBA Figure 6 - Tring Urban Design Diagram 2011

4.21 The 2006 Urban Design Diagrams noted a number of "Proposed View Corridors to be Protected" within Tring. This includes a view looking south-east from the recreation ground adjoining the Icknield Way and north of the Church of St Peter and St Paul, extending across site TR01. Whilst this view corridor is not illustrated on the 2011 updated diagrams, the Update Paper notes that "The original maps contain view corridors: they have not changed and remain very important as a guide to planning policy." The viewpoint lies in the 'Semi-Urban Zone' (2011 but described as the 'Semi-Rural Zone' in 2006) where it is described that there are "connections to the

- surrounding countryside, the Chiltern Area of Outstanding Natural Beauty, Tring Park, and Dundale Lake. The strong countryside borders and vistas along Icknield way and to the south should be protected."
- 4.22 SiteTR03 and in part TR02, adjoin the 'peripheral' zone' on the eastern edge of Tring, where it is noted that "Views into the Green Belt should be protected. There are good views of the countryside and views of the Chiltern Area of Outstanding Natural Beauty from the eastern area" and that "This zone offers connections to the surrounding countryside, the Chiltern Area of Outstanding Natural Beauty, Dundale Lake, the train station and the National Ridgeway Trail. The strong countryside borders and vistas along Icknield way should be protected". Photo reference 41 is given but not readily identifiable in the documentation.
- 4.23 A green gateway is identified on the London Road (B4635) at the southwest edge of site TR01. Green gateways are described in the update paper as "a green landscape area surrounding a main entrance to a settlement" and "visually important green, landscaped gateways on main entrances into the settlement". It is surprising therefore that neither the Dacorum Borough Landscape Sensitivity Study, Site Assessment Study or the proposed site allocation information and requirements for Tring in the emerging strategy, highlight the recognised visually important role that the green space and frontage to the site plays to this approach to Tring.

Dacorum Borough Landscape Sensitivity Study, April 2020

- 4.24 Ove Arup and Partners Limited (Arup) was commissioned by Dacorum Borough Council in December 2019 to undertake a Landscape Sensitivity Study of specific land parcels associated with the fringes of the principal settlements of the borough to inform the Stage 3 Green Belt Review and proposed residential allocations within the emerging Local Plan.
- 4.25 The methodology for the Landscape Sensitivity Study is set out at Section 3 of the report and is recorded as being developed in accordance with current best practice guidance relating to landscape character assessment and the assessment of landscape sensitivity.
- 4.26 The methodology is described as having been "designed for use at the parcel scale, noting relationships with wider landscape character as relevant and has been designed specifically for use in relation to medium and large scale residential development". No further detail or parameters are provided to define what "medium and large scale residential development" is, in terms of quantum, scale, height or density of development. The Sensitivity Study lacks transparency in this regard. This matters because the size of the land parcels and the scale and nature of development within the subsequent proposed allocations that have since come forward varies hugely yet the Landscape Sensitivity Study seemingly takes a "one size fits all" approach and makes no separate assessment of sensitivity to different scales or types of development that might draw out potential "limits" of acceptable development across the parcels.
- 4.27 We note that the methodology allows that "the parcels which achieve between a low and a moderate sensitivity score and do not have other clear reasons for not being developed (based on professional judgement), will have high level development principals suggested to mitigate some of the negative effects development might have, or how to improve on, the parcel and its surroundings." The presentation of

development principals for land that is of moderate sensitivity (ie. where "The landscape has a moderate sensitivity to change arising from residential development. Although the landscape may have some ability to absorb change, some alteration in character may result. Considerable care is still needed in locating and designing such developments within the landscape". (Landscape Sensitivity Study Table 3) suggests that such land could be acceptable to accommodate development. Whilst we would accept that there needs to be a threshold below which it is considered that development could be acceptable, the selection of land that is of 'moderate' sensitivity as this threshold would seem too low a bar.

4.28 The assessment criteria with regard to landscape value are set out at page 6 of the Landscape Sensitivity Study which notes that "Landscape value has been assessed on a five-point scale from national to local/neighbourhood level". This being based upon criteria and thresholds defined in Table 1 of the study.

National

May form part of a nationally designated landscape such as the Chilterns Area of Outstanding Natural Beauty (AONB) or may contain nationally rare landscape types or elements or unique, archetypal or notably intact examples, or conservation interests (heritage/ecological) designated/recognised at the national level. May be strongly representative of archetypal landscape type. May be recognised for its scenic quality or recreational resource at the national level through designation (e.g. representation of special qualities of the AONB). May have featured in or inspired artistic or literary works of national importance and may also form an integral part of nationally designated historic designed landscapes or their setting, or landscapes otherwise of national importance, or forming an essential and documented part of the setting of nationally significant buildings.

Count

May contain regionally rare or important landscape types or elements, or notable examples (e.g. the Black Poplars north of Tring or chalk river valleys and watercress beds). May also contain notable examples of important landscape types at the county level or be broadly representative of this. May include assets designated as being of county level importance, e.g. locally listed landscapes on the county register, or may be recognised for its recreational quality/importance e.g. Regional Park or Country Park. May have featured in artistic/literary works of regional/sub-regional importance.

Borough

May contain notable concentration of locally rare landscape types/examples of district importance, or have moderate degree of representativeness of wider landscape character. May include assets of local importance, e.g. may be part of the setting for a locally listed landscape or may include locally designated nature conservation interests. May have featured in artistic or written works of district level importance.

Community

May contain moderate or partial concentration of locally rare landscape types or elements or have relatively low degree of representation of wider landscape character. May include assets of community importance or of importance to the settlements within the Borough, or which contribute to character and/or landscape elements valued at the wider community level.

Neighbourhood

Where the criteria defined for the above thresholds are largely absent.

HBA Figure 7 - Table 1 (Landscape value threshold definitions) from the Landscape Sensitivity Study

- 4.29 Whilst landscapes that "may form part of a nationally designated landscape such as the Chilterns Area of Outstanding Natural Beauty" are identified as being valued at a 'National' level, the methodology does not appear to allow for landscapes that lie within the setting of the AONB. Whilst the conclusions for each land parcel describe where the landscape provides a setting for the AONB, this does not appear to factor into the assessment criteria and therefore the assessment rankings potentially underplay the landscape value of the AONB setting.
- 4.30 We would also note that despite the Study stating to the contrary, the criteria set out in Table 1 do not fully reflect the range of factors identified in the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) as helping in the identification of valued landscapes.

- 4.31 Furthermore, the use of a geographic scale means that the degree to which the landscape is valued is not addressed. The wording of the threshold definitions in Table 1 of the Study suggests that landscapes valued at a 'Neighbourhood' scale actually have no characteristics of value. A landscape can be highly valued at a local or neighbourhood scale but this does not seem to be reflected in the Study methodology. It is also difficult to understand how the range of factors considered equate to the geographic value scale for example, a rural right of way can provide high recreational value (GLVIA3 value criteria) to both a local community and visitors to the area and can be valued as a public highway at a county level.
- 4.32 We note that whilst overall rankings of value, susceptibility and sensitivity are provided in the Study, this is likely to vary across each of the land parcels, with areas of higher or lower sensitivity throughout. We are unclear whether the rankings provided are considered to be the 'worst case' or represent an average across the land parcel.
- 4.33 Extracts of the relevant parcel assessments from the Landscape Sensitivity Study are provided in HBA Appendix 5 and are summarised below, with HBA comments provided where relevant:

Criteria	Landscape Sensitivity Study Findings and HBA comments (where relevant)
Parcel 122 – Dunsley Farm (site TR01)	
Landscape Value	Neighbourhood value, in light of: moderately intact condition; high representativeness of wider landscape character: views to the Chilterns escarpment, framing and containment by wooded scarp slopes, parkland landscapes at Tring Park, mixed open farmland, urban fringe influences around Tring including; residential sports pitches and arterial transport corridor including the A41; the parcel has no designations within it; the recreational value attached to a PRoW which passes through the parcel, serving the local neighbourhood; and The parcel exhibits a generally intact field boundary pattern of local cultural value. HBA comment: The site is assigned 'neighbourhood' value yet it exceeds the thresholds for 'Borough' value with regard to representativeness. The contribution of the site to the setting of the AONB has not been assigned value, neither has its contribution to the 'green gateway' approach to Tring recognised in the Urban Design Assessments.
Landscape susceptibility	Overall Moderate landscape susceptibility to change Primarily as a result of the parcels limited relationship with much of the surrounding AONB and combination of positive rural characteristics surrounded by urban influences.

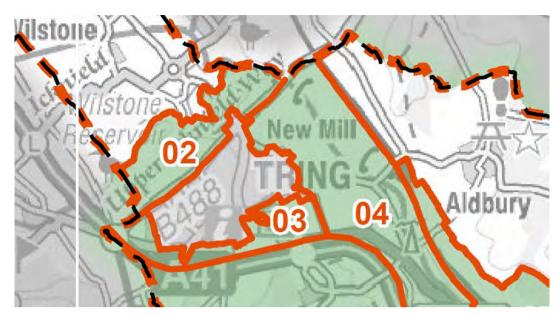
Criteria	Landscape Sensitivity Study Findings and HBA comments (where relevant)
	HBA comment: The views out of the site to the AONB backdrop and views from the AONB in Tring Park and along the Ridgeway/Icknield Way looking back to the site, are
	seemingly downplayed as providing "minimal visual connection to the Chilterns AONB". The development of the site to the east and south-east of the footpath through the site would potentially block existing views to the AONB escarpment and as such, this part of the site is highly susceptible to change. At close distance, the site adjoins the AONB boundary along the London Road and Cow Lane such that development in proximity to those locations would alter the visual setting to the AONB, bringing development to the edge of the designation. The contribution of the site to the current green
	approach to Tring and 'green gateway' provided on London Road is not considered in the assessment.
Overall landscape sensitivity	Moderate overall sensitivity HBA comment: Given the range of issues noted above, we consider that the overall 'Moderate' sensitivity should be considered to be higher.
Parcel 124 – East of Tring (site TR03)	
Landscape Value	Neighbourhood value, in light of: highly intact condition; high representativeness of wider landscape character: views to the Chilterns escarpment, transport corridor including the Grand Union canal, mixed open farmland, urban fringe influences around Tring including a garden centre. the parcel has no designations within it but forms the setting for the Chilterns AONB and is a continuation of the rural aspects of the AONB's character; no recreational value other than a long distance PRoW along the Grand Union Canal The parcel exhibits a largely intact field boundary system of local cultural value.
	HBA comment: The site is assigned 'neighbourhood' value yet it exceeds the thresholds for 'Borough' value with regard to representativeness, is identified as forming the setting to the AONB and sharing rural aspects with it. The observation that the land has no recreational value is incorrect. Whilst the Grand Union Canal

Criteria	Landscape Sensitivity Study Findings and HBA
Landscape susceptibility	towpath and promoted recreational route lie offsite and at a significantly lower level to the site north of Marshcroft Lane, public footpath Tring Town 057 (joining to Tring Town 065) runs along the eastern side of the site, south of Marshcroft Lane and allows open views across the eastern side of TR03. Overall Moderate-High landscape susceptibility to change Primarily as a result of the intervisibility with the Chilterns AONB, large area of open agricultural land and lack of intrusive urbanising influences which creates a high scenic quality.
	HBA comment: We would broadly agree that the key landscape sensitivities relate to the large open agricultural and generally attractive nature of the land combined with its intervisibility with the AONB and contribution that the site makes to the setting of both the AONB and the settlement in those views. Long distance views are also available from Tring Park (within the AONB). Close Distance open views across the south-eastern side of the site are available from public footpath Tring Town 057-065 along the eastern site boundary. The two aforementioned view locations and the susceptibility of the onsite public footpath and offsite Marshcroft Lane (roman road/intact feature) are not obviously addressed in the Landscape Sensitivity Study.
Overall landscape sensitivity	Moderate-High overall sensitivity with a difference noted between the fields north of Marshcroft lane due to moderate-high susceptibility and providing a setting for the AONB and those south of Marshcroft Lane due to the more intricate field pattern and higher sensitivity in terms of scale, pattern and cultural pattern.
	HBA comment: Given the range of issues noted as being missing from the assessment, we consider that the overall sensitivity should actually be considered to be higher to the south of Marshcroft Lane when the missing views and onsite presence of a public footpath are taken into account. This would more likely be akin to the High level of sensitivity considered in the Stage 2 Green Belt Assessment. It is unclear why principles for development are included in the Landscape Sensitivity Assessment for this area as the methodology seeks only to provide these for site with sensitivity lower than 'moderate'.
Parcel 132 – New Mill (site TR02)	The same series and the same series are

Criteria	Landscape Sensitivity Study Findings and HBA comments (where relevant)
Landscape Value	 Neighbourhood value, in light of: Good condition of the landscape due to the level of intactness. moderate representativeness of wider landscape character: mixed open farmland and urban fringe influences around Tring. the parcel has no designations within it but forms the setting for the Chilterns AONB and is a continuation of the rural aspects of the AONB's character; limited recreational value, serving only as a backdrop to the settlement with amenity value for the local neighbourhood HBA comment: We would agree that this site has a limited range of
Landscape susceptibility	factors contributing to landscape value Overall Moderate landscape susceptibility to change
	Primarily as a result of the varied topography within the parcel and the perception of tranquillity. HBA comment: We have only been able to determine the topography of the site through map analysis but would agree with this ranking and observation. The proximity to development on three sides and character of the site edges are also key contributors to this overall ranking. We would generally agree with the range of observations made relating to landscape susceptibility of this site.
Overall landscape sensitivity	Moderate overall sensitivity due to the landscape's proximity to the surrounding developments.
	HBA comment: We would generally agree with this ranking.

Green Belt Review: Purposes Assessment, November 2013

- 4.34 This report provides an independent Green Belt review for Dacorum, St Albans and Welwyn Hatfield administrative areas. It defines Green Belt parcels and considers the role that each parcel plays in fulfilling the aim and four national and one local purpose of Green Belt:
 - NPPF Purpose 1: To check the unrestricted sprawl of large built-up areas;
 - NPPF Purpose 2: To prevent neighbouring towns from merging into one another;
 - NPPF Purpose 3: To assist in safeguarding the countryside from encroachment;
 - NPPF Purpose 4: To preserve the setting and special character of historic towns;
 - Local Purpose: To maintain the existing settlement pattern.



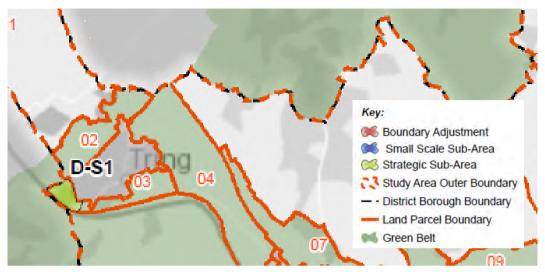
HBA Figure 8 - Location of Green Belt Parcels considered in the Stage 1 Green Belt Review

- 4.35 Site TR01 lies in Green Belt parcel 03, whilst sites TR02 and TR03 lie in Green Belt parcel 04. It can be noted that both parcels cover a more extensive tract of land than just the proposed sites.
- 4.36 The findings of the Stage 1 Green Belt Assessment for these parcels are summarised below:

	Parcel 03 (includes site TR01)	Parcel 04 (includes sites TR02 and TR03)
NPPF Purpose 1 Limited or No contribution		Limited or No contribution
NPPF Purpose 2 Partial contribution Significant co		Significant contribution
NPPF Purpose 3 Partial contribution		Significant contribution
NPPF Purpose 4 Significant contribution Par		Partial contribution
Local Purpose 1 Limited or No contribution		Limited or No contribution

- 4.37 Given the location of Parcel 03 (including Site TR01), in part including land within both Tring Park and the AONB but also acting as an open buffer between the settlement and the wider AONB to the east, it is surprising that the Stage 1 Assessment ranks Parcel 03 as providing only a 'Partial Contribution' to NPPF Purpose 3. In our opinion, the eastern side of Parcel 03 would be more appropriately ranked as performing a 'Significant Contribution' to safeguarding the countryside from encroachment, in this instance; a nationally designated stretch of countryside.
- 4.38 No parcels of land in the study area are assessed as making a significant contribution to all 5 of the Green Belt purposes assessed. One land parcel (parcel 41) is identified as making a significant contribution to 4 of the 5 purposes assessed, whilst one land parcel (Parcel 50) is assessed as not making a significant contribution to any of the 5 Green Belt purposes. The majority of the areas of land considered in the Stage 1 Assessment make a significant contribution to 1-3 of the 5 Green Belt purposes.
- 4.39 The Stage 1 Green Balt Assessment subsequently identifies parcels and where appropriate sub-areas, that contribute least to Green Belt purposes. In parcel 03, sub-

area DS-1 is identified as one such area, this sub-area lying to the south-west of Tring, almost 2km west of the TR01 Dunsley Farm site. The parts of the parcels containing TR01, TR02 and TR03 are not identified as those that make the least contribution to Green Belt purposes.



HBA Figure 9 - Figure 8.1 from Stage 1 Green Belt Review

Stage 2 Green Belt Review and Landscape Appraisal Report, January 2016 (Published December 2016)

- 4.40 This study was prepared by Ove Arup to provide "a more detailed assessment of those parts of the Green Belt identified in the Stage 1 study as contributing least to the Green Belt purposes, as well as other sites adjacent to existing urban areas and large villages…" (para. 1.1).
- 4.41 The objective of the Stage 2 Review is stated as being to highlight which areas are performing least well against Green Belt purposes and are least sensitive in landscape terms. Where appropriate, recommendations are made as to where land might be released without detriment to the overall integrity of the Green Belt.
- 4.42 The Stage 2 Review focuses on the strategic parcels and sub-areas highlighted in the Stage 1 Green Belt Review as warranting further detailed assessment, as well as additional sub-areas at the edges of settlements. At Stage 1, the wider strategic parcels 03 and 04 (within which sites TR01, TR02 and TR03 are located) were not identified as being parcels that contributed the least to the purposes of Green Belt and therefore it is assumed that they were reconsidered in the Stage 2 Review as "additional sub-areas" but this is not explicitly stated.



HBA Figure 10 - Extract from Stage 2 Green Belt Review indicating refined sub-areas around Tring

4.43 Site TR01 lies in Refined Sub-Area TR-A5, site TR02 lies in Refined Sub-Area TR-A2, whilst site TR03 spans Refined Sub-Areas TR-A2 and TR-A3. The Stage 2 Review draws the following conclusions about these sub-areas:

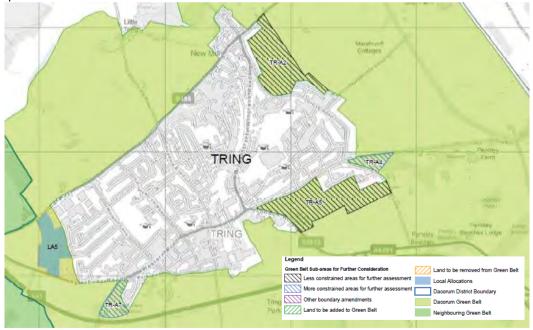
Criteria	Stage 2 Review findings
Refined Sub-Area TR-A5	
(includes site TRO1)	
The extent to which the special qualities of AONB are represented within clusters of sub-areas, and how this might serve as a constraint to change (Table 5.3)	This cluster is more strongly representative of AONB special qualities than clusters TR-A1 – TR-A3 due to its closer proximity to and intervisibility with the scarp and contain a number of key characteristics relevant to historic designed landscapes which are sensitive and form a significant constraint.
Commentary relating to Summary of Sub-Areas Modified or Excluded from Further Assessment (Table 5.4)	The sub-area meets the purposes moderately, but is subject to limited constraint and should be taken forward for assessment, taking into account constraints identified. Sub-area taken forward for further assessment.
Overall landscape sensitivity to residential development (Table 5.5)	The overall sensitivity of this landscape to residential development is judged medium by virtue of its degraded character, management and the presence of urban fringe influences. A degree of sensitively designed and sited development which avoided adverse impact on the adjacent historic landscape settings, could potentially be used to enhance the approach to the town at London Road.
Summary of revised sub-areas considered for boundary amendment. (Table 5.7)	Consider for partial amendment

Criteria	Stage 2 Review findings
Boundary assessment for potential sub-area	The sub-area is punctuated by a network of historic field boundaries which date back over 100 years. The identified potential boundary, which follows established hedgerows, would provide a suitably identifiable and durable boundary for the Green Belt on the southern edge of Tring. Some strengthening may be required to ensure its complete continuity. The further refined sub-area does not compromise
areas for further consideration (Table 7.1)	the ability of the wider Green Belt to meet its purposes, nor is it judged to be highly sensitive to change in landscape terms. Existing historic hedgerows and the hard boundaries of properties would provide robust and defensible boundaries for the Green Belt. Any future assessment work should take into consideration the Cow Lane Farm Meadows local wildlife site in the east of the further refined subarea.
Refined Sub-Area TR-A2 (includes site TRO2)	
The extent to which the special qualities of AONB are represented within clusters of sub-areas, and how this might serve as a constraint to change (Table 5.3)	The intervisibility with the scarp is important in defining settlement setting. This and the more pronounced topographic distinction would be key constraints to development, however the lower lying and contained nature of eastern parcels (reduced sense of openness) in particular would render these areas less constrained as would their generally weak representation of AONB special qualities.
Commentary relating to Summary of Sub-Areas Modified or Excluded from Further Assessment (Table 5.4)	The sub-area meets the purposes strongly, however is subject to little constraint, and should be taken forward for further assessment, taking into account identified constraints. Sub-area taken forward for further assessment.
Overall landscape sensitivity to residential development (Table 5.5)	The overall sensitivity of this landscape is judged medium by virtue of the simplicity of the landscape pattern and the eroded landscape structure (patchy/lost boundary field boundary hedgerows). A more intact and sensitive landscape persists to the

Criteria	Stage 2 Review findings
Summary of revised sub-areas	west, although this also has a high degree of visual containment which reduces sensitivity in visual terms. The intervisibility with the AONB and the Chilterns Escarpment throughout the parcel is important and sensitive. Consider for partial amendment
considered for boundary amendment (Table 5.7)	
Boundary assessment for potential sub-area (Table	The identified historic field boundaries, which consist of long established hedgerows, would provide a sufficiently recognisable and durable alternative boundary for the Green Belt on the eastern edge of Tring.
Summary of less constrained areas for further consideration (Table 7.1)	The further refined sub-area does not compromise the ability of the wider Green Belt to meet its purposes, nor is it judged to be highly sensitive to change in landscape terms. Existing historic hedgerows would provide robust and defensible boundaries for the Green Belt. Any future assessment work should take into consideration the extent of the Grade 2 agricultural land which covers the whole area.
Refined Sub-Area TR-A3 (includes site TRO3)	
The extent to which the special qualities of AONB are represented within clusters of sub-areas, and how this might serve as a constraint to change (Table 5.3)	The intervisibility with the scarp is important in defining settlement setting. This and the more pronounced topographic distinction would be key constraints to development, however the lower lying and contained nature of eastern parcels (reduced sense of openness) in particular would render these areas less constrained as would their generally weak representation of AONB special qualities.
Commentary relating to Summary of Sub-Areas Modified or Excluded from Further Assessment (Table 5.4)	The sub-area meets the purposes strongly however is subject to little constraint, and should be taken forward for further assessment, taking into account identified constraints. Sub-area taken forward for further assessment.

Criteria	Stage 2 Review findings
	The overall sensitivity of this landscape to residential development is judged high by virtue of the relatively intimate, fairly small scale and contained landscape, which has a poor relationship to the settlement.
Summary of revised sub-areas considered for boundary amendment. (Table 5.7)	Exclude from further assessment

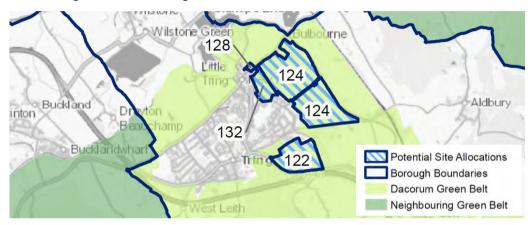
- 4.44 At Stage 2, the Green Belt Review considers that sub-area TR-A3 (containing Site TR03) is not an appropriate Green Belt allocation/development site or a robust alteration to the Green Belt boundary. Indeed, it recommends that sub-area TR-A3 should be excluded from further assessment in terms of potential changes to the Green Belt boundary or its potential removal from Green Belt. We would highlight therefore that at both Stage 1 and 2 of the Green Belt Review, the area of land within which TR03 is located was not recommended as a suitable site to allocate in Green Belt terms. The Dacorum studies consider that the land contributes to the purposes of Green Belt (ie. it was not a site identified as performing least well in Green Belt terms) and also has a number of landscape sensitivities and a poor relationship to the settlement. The subsequent proposed allocation of the site and assessment at Stage 3 has not been informed or led by either Green Belt or landscape considerations.
- 4.45 Parts of TR-A2 and TR-A5 were considered in the Stage 2 Review as being less sensitive to change in landscape terms, relatively unconstrained and not fundamental to the ability of the wider Green Belt to meet its purposes. On this basis, Further Refined Sub-Areas were identified where land could potentially be released from Green Belt and new Green Belt boundaries could be established. The Further Refined Sub-Area for TR-A2 is coincidental with Site TR02, whilst Refined Sub-Area TR-A5 covers the northern part of Site TR01.



HBA Figure 11 - Extract from Map 7.6 in the Stage 2 Green Belt Review

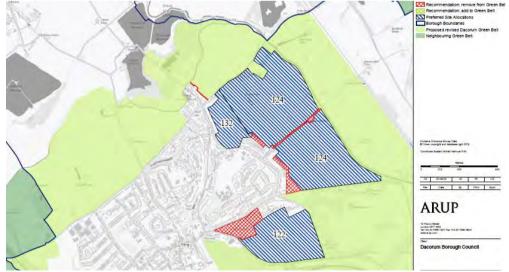
Stage 3 Green Belt Review, 27 August 2020

- 4.46 The Stage 3 Green Belt Review assesses a total of 34 potential housing and employment site allocations that lie within the Green Belt, considering the acceptability of the sites in Green Belt boundary terms and providing site specific advice on any mitigation required. These sites are not a refinement of the earlier Stage 1 and Stage 2 Green Belt work but reflect some of the sub-areas considered, and in many cases, dismissed, at Stage 2.
- 4.47 Site TR01 is referenced as site 122 whilst site TR02 is now site 132 in the Stage 3 Review. Perhaps surprisingly, Site TR03 remains in the Green Belt Review, despite the earlier Stages recommending it should not be considered further and is site 124.



HBA Figure 12 - Extract from Figure 4.1 in the Stage 3 Green Belt Review

- 4.48 The Stage 3 Review looks only at the Green Belt boundaries in relation to potential allocation sites and does not provide a new or updated assessment of openness or the contribution of the sites to Green Belt purposes.
- 4.49 The Review recommends that the allocation of Sites TR01, TR02 and TR03 would result in small pockets of land that adjoin the sites no longer performing a Green Belt function and therefore also requiring release from Green Belt.



HBA Figure 13 - Figure 6.13 from the Stage 3 Green Belt Review indicating proposed alterations to the Green belt around Tring

4.50 It is notable that the Stage 1 and Stage 2 Green Belt Reviews do not appear to have provided the basis for the subsequent proposed allocation of sites TR01, TR02 and TR03. There is a gap in the Green Belt Assessment work in that Stages 1 and 2 are led by a consideration of Green Belt and landscape issues in terms of identifying the best (or least worst) locations for proposed allocations/major development to be located without detriment to the Green Belt. At Stage 3 however, this Green belt and landscape advice is seemingly ignored and sites are imposed upon the study. The Stage 3 sites have not been selected on the basis of Green Belt or landscape considerations or as part of further refinement of the earlier Green Belt assessment work and indeed do not reflect the findings of the earlier work.

Dacorum Landscape Character Assessment

4.51 The Dacorum Landscape Character Assessment is discussed separately above in relation to the landscape baseline.

5 SUMMARY AND CONCLUSION

- 5.1 Whilst sites TR01, TR02 and TR03 are not covered by any landscape designation, they lie within the setting of the nationally designated Chilterns Area of Outstanding Natural Beauty (AONB) and are visible, to varying degrees as part of the setting to both the AONB and the countryside edge to Tring and form part of the wider foothills landscape in panoramic views from high ground in the AONB.
- 5.2 All three sites lie in Green Belt at the edge of the settlement and adjoin or lie within the setting of the AONB. However each site has quite different landscape and visual attributes and sensitivities that affect the way it reads in the landscape and inform judgements regarding the appropriateness of the site for allocation for major development.
- 5.3 The following issues of soundness are raised in relation to the Green Belt and landscape evidence base documents:
 - The findings of the Stage 1 and 2 Green Belt Studies, in particular with regard to sites TR01 and TR03, are seemingly disregarded and not taken into consideration in the subsequent Stage 3 Green Belt Assessment and proposed site allocations. The Stage 1 and 2 Green Belt Studies recommend that site TR03 is excluded from further consideration and that site TR01 is considered in a significantly reduced form. The proposed allocation of TR01 and TR03 has not been informed by Green Belt considerations.
 - None of the Green Belt Assessments appear to give due consideration to the role of the Green Belt in forming a buffer to the AONB when considering how well land parcels perform against NPPF Green Belt purpose 3.
 - Notwithstanding our observations regarding missing views, rights of way and green gateways, the Landscape Sensitivity Study considers that Site TR03 (Parcel 124 in the Study) has moderate-high overall landscape sensitivity to development and that Site TR01 (Parcel 122) has moderate overall landscape sensitivity to change. We are of the opinion that both sites should be considered to have higher sensitivity in certain locations when the baseline situation is more accurately applied. However, these are not landscapes without constraint and have above

'average' or 'median' sensitivity. It is difficult to understand why (when also taking into account the recommendations of the evidence base Green Belt studies), site TR03 in particular has then subsequently been taken forward as a proposed allocation.

- The Landscape Sensitivity Study lacks transparency and therefore robustness or soundness in some areas. No further detail or parameters are provided to define what "medium and large scale residential development" is, in terms of quantum, scale, height or density of development.
- The assessment criteria with regard to landscape value do not fully reflect the range of factors identified in the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) and more recent Landscape Institute Technical Guidance (TGN 02/21) as helping in the identification of valued landscapes. The use of geographic scales as thresholds for landscape value results in an inability to properly understanding how highly valued the landscape is.
- Neither the Landscape Sensitivity Study nor the Site Assessment Study consider the role that site TR01 plays to the "Green Gateway" identified in the Urban Design Assessments, this being considered a "visually important green, landscaped gateway" in both the 2006 and 2011 Urban Design Assessments.
- 5.4 We make the following observations regarding landscape, visual and Green Belt issues arising from the proposed site allocations:

Site TR01 – Dunsley Farm

- The site is a prominent location forming part of the green gateway and approach to Tring from the A41 south. Whilst the treed and vegetated site frontage generally filters views, it provides a strong green edge and allows glimpsed views to the fields of the site beyond. Together, this creates a strong sense of rurality to this edge of Tring and a clear open buffer to the countryside of the AONB. There is a perception of the countryside (Site TR01 and land east of Cow Lane) extending up to the settlement.
- 5.6 The contribution of the southern part of the site to this 'Green Gateway' to Tring is identified as a key characteristic of this part of Tring in the Urban Design Assessment Update. However, it is not considered in the rest of the evidence base to the emerging strategy and in our view should have been one of the key issues in considering the suitability, constraints and requirements relating to the site.
- In some of the elevated views from the Chilterns AONB, identified at Tring Park and the Icknield Way/Ridgeway near Pitstone Hill, site TR01 is visible as part of the countryside setting to Tring and buffer between Tring and the AONB. Whilst the emerging strategy Tring Proposals and Sites document notes that views should be protected, it is difficult to understand how this could be achieved with the proposed 400 new homes, employment, community and education buildings in the place of a currently verdant site.
- 5.8 The presence of the public footpath through the site provides recreational value and allows for views and a visual connection with the adjoining AONB east of Cow Lane. It also allows for views across the eastern portion of the site to the distant and landmark backdrop of the Chilterns. Those views of the AONB would inevitably be lost or curtailed should the level of development anticipated be accommodated on the site.

- We note that the Site-Specific Requirements for TR01 require the recreational value of the public right of way to be taken into account or mitigated and whilst recreationally, a public footpath could still provide a pedestrian link across the site, the amenity value and visual experience would in all likelihood be altered to that of a more urban path.
- 5.9 With regard to the proposed allocation "site-specific requirements, whilst the range of landscape, urban design, biodiversity and other considerations is extensive, it is difficult to see how all of the constraints identified could realistically be addressed and the overall quantum of development still achieved.
- 5.10 At the western side of the site, the Tring Brewery and adjoining commercial uses exert a built influence on the site and some enhancements might be able to be achieved through the creation of new landscape boundary treatments and buffers that might also help to contain the existing built forms and any new small-scale and low-level commercial units in this area.
- 5.11 The Stage 2 Green Belt Review recommends that the northern part of Site TR01 could be considered appropriate for removal from Green Belt with the potential establishment of a robust Green Belt boundary along established hedgerows and responding to the existing line of development to the north of the site. We would agree with the Stage 2 Green Belt Review in this regard. We would also note that the site, most notably through its eastern half, plays a role in providing a robust and generous open buffer between the settlement and the AONB boundary along Cow Lane. Whilst this could to a degree be achieved through locating open space or school playing fields through the eastern side of the site, a generous buffer would seem difficult to "fit" into the site alongside the other development requirements.
- 5.12 From a landscape and visual perspective, Site TR01 is not considered to be wholly appropriate for development overall, but a smaller area addressing the existing built forms to the north and west and restricted to the western side of the site with a strong frontage retained to London Road is considered more appropriate to adequately address the range of constraints and sensitivities.

Site TR02 - New Mill

- 5.13 TR02 is generally well contained in the local landscape by existing built forms to the north south and west and hedgerow and mature vegetation to the east and along Bulborne Road, Marshcroft Lane and Grove Road where they adjoin the site. Whilst the site is visible in long distance overlooking views from the Chilterns AONB, near lvinghoe Beacon and Icknield Way at Z=XX Hill, it is a minor component of the view and reads as an adjunct to the urban settlement edge and does not make a significant contribution to the wider countryside setting to Tring.
- 5.14 In landscape and visual terms, it is considered that there is scope for residential development to be sensitivity accommodated on this site. This would tie in and 'round off' the settlement edge between properties on the eastern side of Bulbourne Road and on the northern side of Grove Road where the settlement pattern steps around Hollyfield and Hollyfield Close. A robust and in-character woodland edge or hedgerow boundary could be established to the northern edge of any development to retain and enhance the existing green settlement edge and make a positive contribution to the wider countryside setting and buffer with the AONB. In this regard, we agree with the

findings of the Landscape Sensitivity Study and the overall site-specific requirements identified in the emerging strategy 'Tring Proposals and Sites' document.

5.15 Site TRO3 - East of Tring

- 5.16 The findings of both the Stage 1 and Stage 2 Green Belt Reviews that form part of the evidence base to the Dacorum New Local Plan, consider that this site makes a strong contribution to Green Belt purposes. It is not an area of land that was assessed as making the least contribution to Green Belt purposes or as being appropriate to release from Green Belt/amend the Green Belt boundary in this location. It was not recommended for further consideration as an allocation in the Green Belt studies. Its subsequent inclusion as a large-scale growth site is not led by Green Belt recommendations nor landscape and visual considerations.
- 5.17 The Landscape Sensitivity Study subsequently considers TR03 to be of Moderate-High Landscape Sensitivity overall. This is therefore a landscape that is 'above average' in terms of its landscape sensitivity. We have noted a number of discrepancies in the Study relating to the presence of a right of way within the site allowing close distance views across the eastern half of the site south of Marshcroft Lane and the way in which susceptibility and value are considered. We are of the opinion that the value, susceptibility and sensitivity of this part of the site should therefore be considered to be higher than assessed.
- 5.18 The site forms the countryside setting to Tring in views from the Chilterns AONB along the Ridgeway/Icknield Way, at Ivinghoe Beacon and to the south from within Tring Park and near the Twist. In those views it is also provides a buffer between the settlement and AONB.
- 5.19 The Emerging Strategy records that in terms of landscape considerations, the development would need to take account of and/or mitigate the intervisibility with the wider landscape due to the elevated areas of the Chilterns AONB. This is just one of a list of landscape constraints in addition to numerous biodiversity and Green Infrastructure, cultural heritage, flood risk, community and highways constraints upon site TR03. Given the high level of sensitivity and the number of constraints, it is difficult to understand how imposing 1800 homes, two schools, a neighbourhood centre and associated highways and access could be achieved whilst for example, taking into account and mitigating "the strong scenic quality from the agricultural landscape and enclosure of the parcel". The only clear way of achieving this is to retain the site (or at least the majority of it) as agricultural land that forms a strong buffer and rural setting to this edge of Tring.
- 5.20 When all of the landscape and visual related constraints are addressed, this is not a suitable development site.
- 5.21 The proposed allocation of site TR03 is considered to be harmful in landscape and visual terms and potentially damaging to the setting of the AONB. The proposed allocation and its potential development, would essentially fill a large swathe of open countryside that is considered to have good scenic value and read strongly as part of the rural setting to this part of Tring and separation to the AONB. This can be appreciated from local high points in the Chilterns AONB, such as on the Icknield Way/Ridgeway and Tring Park.

5.22 In our opinion Site TR03 is unsuitable in landscape and visual terms for a growth site of the scale anticipated. A significant reduction in the overall extent of the site could be considered more acceptable, but would need to tie in with the existing in-character hedgerow boundaries and retain a substantial belt of open working farmland on the eastern side, to continue to function as an open attractive rural buffer to the settlement and AONB.

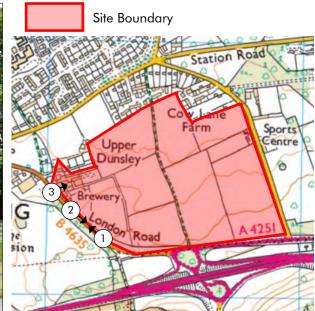
Overall Conclusion

- 5.23 On the basis of our own site visits and critical appraisal of the evidence base, a number of landscape and visual concerns are raised regarding both the soundness and completeness of the landscape and Green Belt evidence base and how the findings have, or indeed, haven't been used to inform the subsequent proposed allocations.
- 5.24 Site TR02 New Mill is considered to have the lowest sensitivity to change in landscape terms. Whilst the loss of any greenfield countryside site could be considered to be a loss of landscape resource, the site is generally well contained and has few landscape constraints. TR02 offers potential to sensitively accommodate development that could tie in with and 'round off' the existing built pattern with limited harm to the openness of the Green Belt, the wider appreciation of Tring in its countryside setting or the setting of the AONB. or the countryside edge. In this regard, we generally agree with the findings of the evidence base and the landscape objectives of the emerging strategy for TR02.
- 5.25 The proposed allocation of the whole of Site TR01 (rather than the two alternative reduced size sites advocated in the Dacorum Green Belt Studies and the Site Assessments Study) and Site TR03 are considered to be both illogical and unjustified in landscape or Green Belt terms. Both sites are noted as having major constraints. It is difficult to see how all of the constraints and objectives could be satisfactorily addressed and the level of development anticipated actually delivered on either of these sites.
- 5.26 The cumulative landscape and visual impacts of the potential future development of all three sites do not appear to have been considered or used to inform the proposed emerging strategy. In our opinion, should all three allocated sites come forward for development, the size of Tring would increase by around 60% and to the extent that the "distinctive compact nature of this market town" as described in the current Core Strategy would be diminished.

Landscape Statement by Huskisson Brown Associates In response to the New Dacorum Local Plan (to 2038) June 2021

Appendix HBA 1
Photosheets - views of the sites from public viewpoints





1. View north along London Road (western site boundary) and 'green gateway' to Tring.



2. View south along London Road, leaving Tring



3. Tring Brewery site in western corner of site TR01



Date: 15/06/21 Dwg No: HBA-874-001 Rev: -Scale: NTS By: NB Ck: Ap: NB



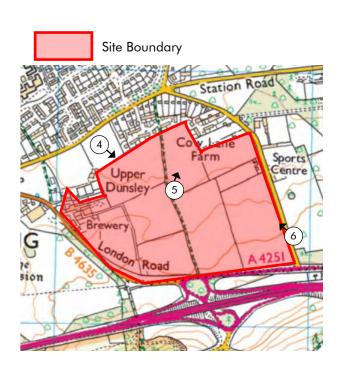
4. Looking south-east across cricket grounds (north-west boundary) towards TR01



5. Northern site boundary from footpath within the site - housing on Damask Close is visible softened by trees



6. Looking north along Cow Lane and eastern site boundary





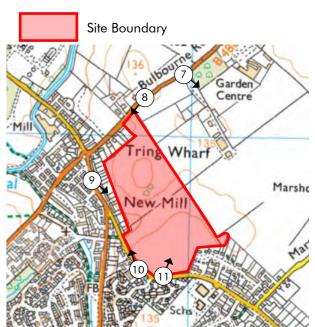
landscape architecture ■ urban design
E: office@huskissonbrown.co.uk
www.huskissonbrown.co.uk expert witness environmental planning

Project: Tring Landscape Statement Client: Tring Town Council

Title: Photographs of Site TR01

Date: 15/06/21 Dwg No: HBA-874-001 Rev: -By: NB Ck: Ap: NB Scale: NTS





7. Looking south and south-east from the entrance to Grove Farm on Bulbourne Road across site TR03 and the easter boundary to TR02





8. Northern boundary to site TR02 with Bulbourne Road, looking south-west along the road corridor.





10. Looking north-west along Grove Road and hedged section of western boundary to TR02



11. Gated access to site TR02 on Grove Road



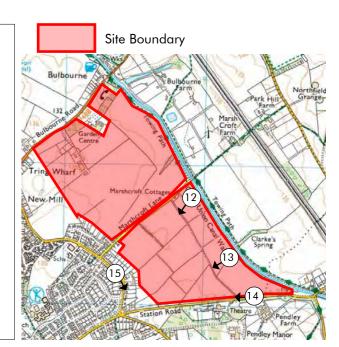
expert witness environmental planning

Project: Tring Landscape Statement Client: Tring Town Council

Title: Photographs of Site TR02

Dwg No: HBA-874-001 Rev: -Date: 15/06/21 By: NB Ck: Ap: NB Scale: NTS





12. Looking south-west across the southern section of site TR03 from public footpath Tring 057 (part of the Grand Union Canal Walk) on the site's eastern boundary near Marshcroft Lane



13. Looking west across site TR03 towards the settlement edge of Tring from public footpath Tring 057 (part of the Grand Union Canal Walk) on the eastern site boundary to site TR03



14. Well treed rural character to Station Road adjoining the southern boundary to TR03



15. Properties at the southern end of Grove Road forming western boundary to TR03



landscape architecture ■ urban design

expert witness ■ environmental planning

Project: Tring Landscape Statement Client: Tring Town Council

Title: Photographs of Site TR03

Dwg No: HBA-874-001 Date: 15/06/21 By: NB Ck: Scale: NTS Ap: NB



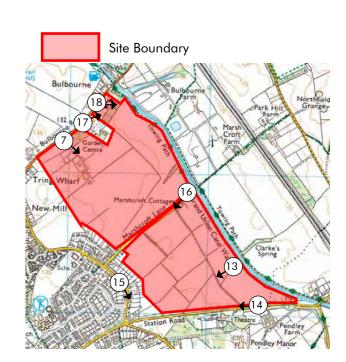
16. Marshcroft Lane looking south-west near Marshcroft House and cottages, TR03 abuts the lane on both sides.



17. View looking north-east along Bulbourne Road (northern site boundary to TR03) just north of Tring Garden Centre (excluded from site)



18. Looking north east along Bulbourne Lane in Bulbourne (northern boundary to TRO3) at the north-eastern extent of the site



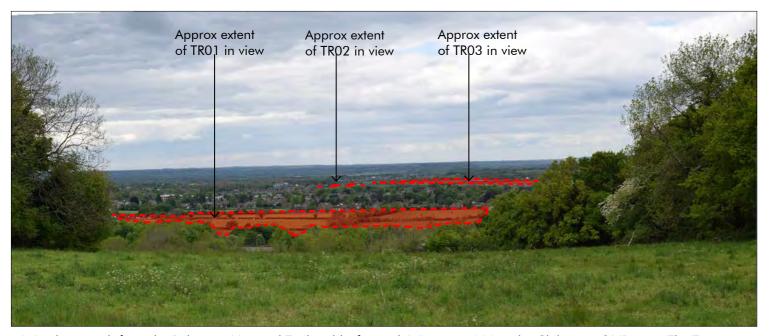


landscape architecture ■ urban design
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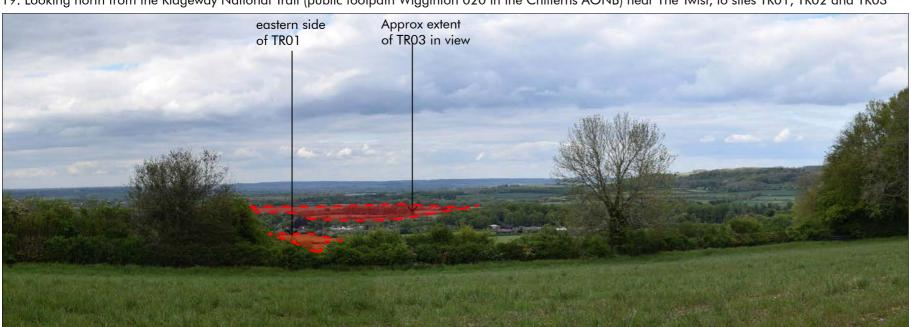
Project: Tring Landscape Statement Client: Tring Town Council

Title: Photographs of Site TR03

Dwg No: HBA-874-001 Rev: -Date: 15/06/21 By: NB Ck: Ap: NB Scale: NTS



19. Looking north from the Ridgeway National Trail (public footpath Wigginton 020 in the Chilterns AONB) near The Twist, to sites TR01, TR02 and TR03



20. Looking north from the Ridgeway National Trail (footpath Wigginton 014 in the Chilterns AONB), to sites TR01 and TR03





21. Looking north from the Icknield Way and Ridgeway National Trail (footpath W 014), King Charles Ride in Tring Park (registered Historic Park and AONB), to sites TRO1, TRO2 and TRO3



22. Looking north from the Icknield Way and Ridgeway National Trail (footpath Wigginton 014) near Rond Point on King Charles Ride in Tring Park (registered historic park and AONB), towards sites TR02 and TR03



expert witness ■ environmental planning

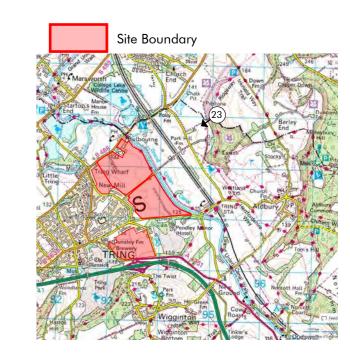
Project: Tring Landscape Statement Client: Tring Town Council

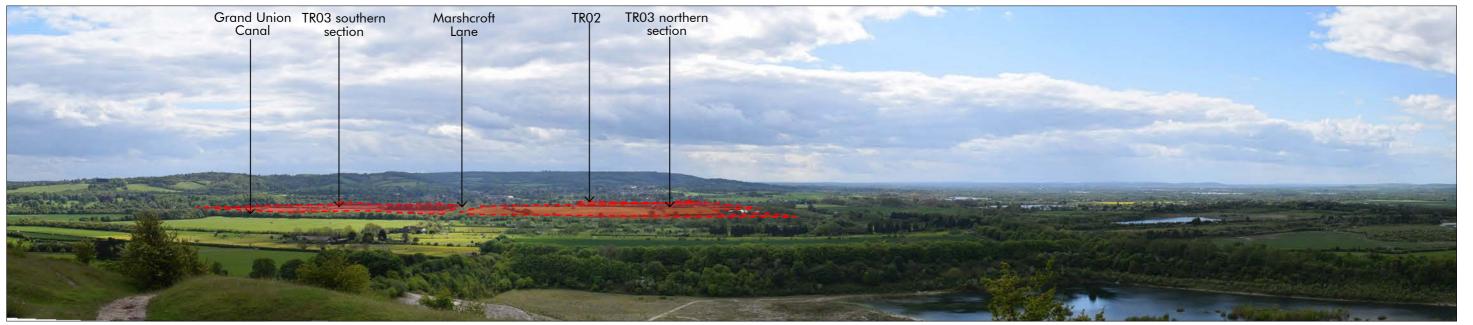
Title: Photographs of Site:Long Distance Views

Date: 15/06/21 Scale: NTS

Dwg No: HBA-874-001 Rev: -

By: NB Ck:





23. Long distance view from the Ridgeway at Pitstone Hill (AONB) (sites TRO and TRO3)



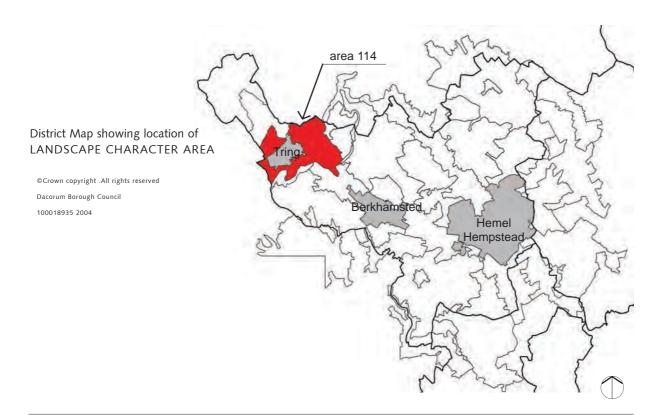
Project: Tring Landscape Statement
Client: Tring Town Council
Title: Photographs of Site:Long Distance Views

Date: 15/06/21 Dwg No: HBA-874-001 Rev: -Scale: NTS By: NB Ck: Ap: NB

Landscape Statement by Huskisson Brown Associates In response to the New Dacorum Local Plan (to 2038) June 2021

Appendix HBA 2

Extract from Dacorum Borough Landscape Character Assessment LCA 114 Tring Gap Hills



LOCATION

The area lies between the Tring Reservoirs to the north west and the Chiltern escarpment to the south east. The area includes the town of Tring and extends to the head of the River Bulbourne at Cow Roast.

LANDSCAPE CHARACTER

A transitional landscape between the low lying Aylesbury Vale and the Chilterns. The landforms, based on the underlying chalk geology are generally gently undulating but with stronger local expressions, particularly at the interface with the elevated Chiltern escarpment. As its name suggests the area is also the focus of a number of key communication corridors including; canal, road and rail. The town of Tring is centrally located within the area.



KEY CHARACTERISTICS

- views to the Chilterns escarpment
- framing and containment by wooded scarp slopes
- arterial transport corridor including; west coast main line, A41, Grand Union Canal and Akeman Street
- mixed open farmland
- parkland landscapes at Tring Park and Pendley Manor
- urban fringe influences around Tring including; residential sports pitches and a garden centre
- recreational routes including the Grand Union Canal Walk and the Ridgeway

DISTINCTIVE FEATURES

- brick and flint estate walling and Victorian lodges to Tring
- Tring Park Mansion
- Tring Park grasslands
- Pendley Manor/Farm and parkland
- Pitstone Hill chalk pit
- disused Wendover Arm of Grand Union Canal

Tring Park (J. Billingsley)

summary

PHYSICAL INFLUENCES

Geology and soils. This area is notable geologically, as it has resulted from the severe erosion of the Tring Gap during the Pleistocene ice incursion. The result is a complex of low, uneven hills on Middle Chalk, especially in the south west of the area, and extensive areas of calcareous gravels etc. forming outwash/moraine deposits towards the north. Tring town although excluded from the area is geologically part of this pattern. Soils vary within the area. To the north west they are well drained calcareous silty soils, (Wantage1 and Andover 1 associations), while to the south east they are flinty and fine silty, (Charity 2 association).

Topography. Generally, the topography is gently undulating, but locally is more pronounced such as at Tring Park south of the A41. In contrast between the canal and railway cutting, around Marshcroft Lane, the landform is almost completely flat and more related to the Bulbourne Valley floor from which it extends.

Degree of slope. Gradients vary across the area. East of Tring around Marshcroft Lane the area is almost flat, being less than 1 in 100. In contrast over Tring Park slopes are typically around 1 in 20. Elsewhere they range between 1 in 40 and 1 in 70.

Altitude range. Levels in this transitional area vary from 105m north of Tring to 150m at the foot of the true Chiltern scarp slope.

Hydrology. The watershed between the Bulbourne and Thame catchments occurs at Marshcroft Farm. The former source of the River Thame was at Bulbourne Farm, but this was tapped to support the Grand Union Canal, which also runs in parallel with the River Bulbourne to the south east, (see Area 117). Apart from the canal, the remnants of the River Bulbourne, and the cut-off section of the Bulbourne spring, there is little surface water, as the former wetlands at Marshcroft Farm have long since been drained. The dry chalk valley in the lower area of Tring Park is the spring head for a stream which flows through Tring town to Tringford Reservoir. At Miswell, there is a semi-natural spring-fed pool. Man made features include the Grand Union Canal and the chalk pits for the former Pitstone Cement Works.

Land cover and land use. Arable farmland occupies most of the land to the north and east of Tring. To the south of the town a mix of grazing and various recreational uses, including playing fields and sports clubs are more prominent. The parklands of Tring Park and Pendley Manor are distinctive landscapes and include a number of fine parkland trees. The associated land uses include grazing, equestrian and recreational activity. Woodland cover is generally restricted to parkland planting and linear belts along transport corridors.

Vegetation and wildlife. To the south of Tring the lower lying calcareous/neutral grasslands have largely been improved, but there are important remaining meadows at West Leith Farm, and Cow Lane Farm, with less diverse grasslands south of Tring itself, but Yellow Rattle is a particular feature. The chalk grasslands at Tring Park, (see also Area 111), are especially noted for their colonies of Chiltern Gentian and Chalk Eyebright.

Woodlands in the area are all likely to be secondary, but there appear to be remnants of older beech woodland at Pendley Manor to the east. Isolated copses occur at Marshcroft Farm, but are mainly secondary woodland. The canal banks also support secondary ash/sycamore woodland. The chalk banks of Tring railway cutting, along with some spoil banks from the canal, formerly supported calcareous grasslands, but these are now largely scrubcovered.

To the north of Tring town the open farmland around Miswell and Little Tring is of limited ecological interest, except for some reasonably rich hedges and scrub, especially associated with the disused Wendover Arm of the canal, although some of this has recently been removed. The spring-fed pool at Miswell is of local interest.

HISTORICAL AND CULTURAL INFLUENCES

At Tring Park there is a very strong sense of historical and cultural continuity, dating back to 1609. The Christopher Wren mansion, dating from the late 1680's, was heavily restored, reconstructed and extended by Lord Rothschild around 1915. As a result the original fabric is now encased in a French Second Empire style shell of red brick with extensive decorative stone work including coining pediments and a porte-cochere. The Rothschild family moved into the park in 1873. The second Baron Rothschild was renown for his interest with exotic animals including zebras, kangaroos and ostriches which were allowed to graze in the park. The Zoological Museum in the town contains a remarkable collection of taxidermy. The park has many historic features of note including veteran parkland trees, both as singles and clumps and the monumental 1836 Lime Avenue, now violently dissected by the Tring Bypass. Other features include Nell Gwynn's obelisk and pavilion (see Area 111), which allude to the supposed visits of King Charles II. Other major cultural features of the area are Grand Union Canal and Tring Cutting for the London Glasgow West Coast Mainline Railway. The latter, a 2 mile long cutting was often marvelled over in the railway literature of the time.

Field Patterns. Apart from the parkland landscapes of Tring Park and Pendley Manor the majority of the area has a historic field pattern dating from the parliamentary enclosures from the 18th century. To the east along the Grand Union Canal corridor there are strong geometric shapes which date from the draining of the area and the construction of the canal and railway. Pockets of former common were also enclosed in this eastern part. To the west and north there has been further 20th century rationization into larger units. Field boundaries are defined by medium sized hedgerows and fields are typically medium to large.

Transport pattern. A main feature of the area are the numerous arterial routes. The Roman Road - Akeman Street (A41), ran along the Bulbourne valley and then on to Aylesbury. The original rote was superceded by the A41(T) Tring Bypass in the 1970's but caused great damage to the integrity of the historic Tring Park in the process. To the east the Grand Union Canal -1793 and the London to Glasgow West Coast Main Line both reach a summit at Tring Gap. The earthworks associated with both routes resulted in strong artificial linear features in the landscape. The local road network consists of a number of roads and secondary lanes. The now disused Wendover Arm of the Grand Union Canal crossed several significant level changes to the north of the area. This is evidenced in the substantial earthworks and the remains of an aqueduct. The route became uneconomic to maintain and is now empty along this stretch.

Settlements and built form. Outside the limits of the town settlement is sparse. Isolated buildings include the typical Rothschild Cottages (half timber with stucco), which relate to Tring Park. To the northern edge of Tring there are a few notable buildings including the Walter Rothschild Zoological Museum, built in the characteristic red brick 'Rothschild Vernacular'.

OTHER SOURCES OF AREA-SPECIFIC INFORMATION

English Nature: SSSI notification

N.Pevsner: Hertfordshire - The Buildings of England

CMS: Management Plan for Tring Park

English Heritage: Registered Park and Garden citation

English Heritage: Schedule entry

 From Marshcroft Lane to Aldbury Nowers (A.Tempany)



VISUAL AND SENSORY PERCEPTION

The area is widely visible from surrounding areas and in particular from the scarp slopes and plateau edge to the south. From Tring town there are some open views to the landscape. There is a variety in enclosure between the various sub areas, ranging from open to the east and north and more contained to the south around Tring Park. The presence of Tring town within the centre of the area and the associated urban fringe uses serves to disrupt the coherence of the area.

Rarity and distinctiveness. This is an unusual landscape type within the county. The localised situation within Tring Park where the parkland runs up into the Tring Scarp Slopes is unique within the county.

VISUAL IMPACT

Tring is locally intrusive to the north, through the presence of selected buildings e.g. the space age styled leisure centre and by the various sports facilities to the south east of the town. To the south vernacular properties sit easily with the adjacent pasture while Tring Mansion and the Zoological Museum create a distinctive interface with the park. In contrast the A41 Tring Bypass represents a major intrusion both through its presence and the damage caused to the parkland. This has been further compounded by an unsightly footbridge which severs the lime avenue. To the east the earthworks associated with the canal and railway are the only visible evidence of routes which pass in cutting through the landscape. The Pitstone Hill Chalk pits to the north east are reasonably large scale landscape elements, however they are only visible from the scarp Aldbury Nowers, (see Area 116), as the remaining boundaries are marked by woodland.

ACCESSIBILITY

summary

There are a number of footpaths links from Tring outwards particularly to the south and west. Access to Tring Park is primarily for those arriving on foot which restricts a wider population using the resource despite good access within the park. There are waymarked routes along both the main Grand Union Canal an the dry/ disused section of the Wendover Arm. The Ridgeway Footpath crosses the area through Pendley Manor and past Tring Station. The Ridgeway footpath crosses the area connecting between the scarp slopes.

COMMUNITY VIEWS

This and the associated Tring Scarp Slopes form an area of landscape well regarded for its distinctiveness, particularly around Tring Park (C). "Tring Park is a lovely area" (2236) "The Wendover arm has now become established as valuable habitat. Brushland in the dry section supporting mammals nesting birds and insects" (2235).

"I hope whoever has charge of [Tring Park] will have seen it this summer in its prime, with the wild woods tumbling into the valley, and the owls beating over a mile of waving grass that looked less like tame old England than the Elysian plains of John Muir's California before the ranchers came" R.Mabey from "On the Sidelines" BBC Wildlife November 1993.

LANDSCAPE RELATED DESIGNATIONS

AONB (south of Tring)

SSSI: Oddy Hill and Tring Park

SSSI: Tring Woodlands (Grove and Stubbing Woods) Registered Park and Garden: Tring Park (Grade 2)

SM: Stool Baulk

Areas of Archaeological Significance: Marshcroft Lane, Miswell Farm, Pendley Manor, Tring Station and West Leith

CONDITION

localised Land cover change: Age structure of tree cover: mature Extent of semi-natural habitat survival: scattered Management of semi-natural habitat: good Survival of cultural pattern: interrupted Impact of built development: moderate Impact of land-use change: moderate

STRENGTH OF CHARACTER

Impact of landform: apparent Impact of land cover: apparent Impact of historic pattern: apparent Visibility from outside: widely visible Sense of enclosure: partial incoherent Visual unity: unusual Distinctiveness/rarity:

STRENGTH OF CHARACTER				
		WEAK	MODERATE	STRONG
ŏ	POOR	Reconstruct	Improve and restore	Restore condition to maintain character
CONDITION	MODERATE	Improve and reinforce	Improve and conserve	Conserve and restore
z	G00D	Strengthen and reinforce	Conserve and strengthen	Safeguard and manage

STRATEGY AND GUIDELINES FOR MANAGING

CHANGE: IMPROVE AND CONSERVE

- promote the retention of the character of local minor roads by the management of hedgerows and verges. Where part of a hedge has been damaged or removed it should be replanted with a mix of indigenous species
- strengthen the setting of the scarp slopes by enhancing the landscape structure of the foothills by the promotion of the removal/screening of eyesores and the management/reintroduction of boundary features to reduce the scale and openess
- promote the survey, retention and restoration of the historic parklands at Tring Park and Pendley Manor through a range of initiatives including; tree planting, reversing arable to pasture. Restoration of structures should be historically accurate. At Tring Park measures to be in sympathy with existing CMS management strategies of ecologically sensitive sites. Develop a strategy to reduce intrusive features e.g. the A41 footbridge and provide enhanced access
- promote the appropriate management of woodland in order to conserve and where absent to re-establish a rich ground flora and the distinction between different management systems, such as high forest and coppice with standards. To encourage replanting plantations with indigenous mixed broadleaves
- promote the creation of buffer zones between intensive arable production and important semi-natural habitats and the creation of links between semi-natural habitats
- · conserve unimproved and semi-improved grassland wherever possible avoiding agricultural improvements and to seek opportunities to restore and create new species rich grassland adjacent to existing chalk downland on the scarp slopes. Encourage traditional management by grazing
- develop a strategy for recreation and public access to the area. To include for interpretation of historic features and natural history and best use of car parking facilities. Include for enhancing links between Grand Union Canal, The Ridgeway and other recreational routes

- support a strategy to limit the impact of built development including Tring on the area. Ensure that development both in the area or adjacent to it are integrated through the use of native tree and shrub species and the creation of hedging and/or planting to the perimeter
- ensure that local highway improvements are sympathetic to the scale, pattern and character of the existing road network
- encourage the restoration of former mineral sites, including the chalk quarry south of the B488, for conservation benefits and to enhance the setting from the adjacent scarp slopes. Resist further quarrying for
- conserve and enhance the distinctive character of settlements and individual buildings by promoting the conservation of important buildings and high standards of new building or alterations to existing properties, all with the consistent use of locally traditional materials and designed to reflect the traditional character of the area
- encourage the retention of the existing pattern of hedges and to create new features to further enhance landscape and ecological links between and to woodlands, canal corridor and parklands. Use old field boundaries where possible
- develop a strategy to mitigate the impact of the intrusive transport routes
- promote awareness and consideration of the setting of the AONB, and views to and from it, when considering development and land use change proposals on sites adjacent to the AONB
- · conserve and enhance the distinctive character of traditional settlements and individual buildings by promoting the conservation of important buildings and high standards of new building or alterations to existing properties, all with the consistent use of locally traditional materials and design to reflect the traditional character of the area





Landscape Statement by Huskisson Brown Associates In response to the New Dacorum Local Plan (to 2038) June 2021



TRING PROPOSASAND SIES



Tring

Tring Allocations

Growth Area Tr01: Dunsley Farm



Size (Hectares)	37.25 ha
Allocated for (key development and land use requirements)	 Around 400 new homes (including provision for older people).
	 A General Employment Area in the west of the site fronting London Road, consisting of 5.4 ha of new employment land (providing around 20,000 sq. metres of office, industrial and storage or industrial floorspace) and 2 ha of land already partly in industrial/commercial use (including Tring Brewery), which has scope for further small-scale employment development. The employment development should consist mainly of units of under around 2,000 sq. metres.
	 Around 4,000 sq. metres of the built employment floorspace should comprise small units of less than about 400 sq. metres. A supermarket will be encouraged within the General Employment Area, but only if a supermarket cannot be delivered in Tring town centre on the High Street/Brook Street site (Growth)



Area.

Area Tr06) and it would not have a significant

A new fire and rescue station to replace the existing facility on Growth Area Tr06 would be another acceptable use within the General Employment

adverse impact on the town centre.

A new primary school (3ha).

Site-specific requirements

Urban Design Principles:

 Design codes/masterplans will be developed alongside the preparation of any outline planning application and agreed by means of condition.

Access, Highways and Sustainable Transport:

- Vehicular access to be provided via London Road and Cow Lane. Primary access to employment site to be provided separately via London Road.
- Provision and/or contributions towards new/enhanced pedestrian and cycle links with Tring town centre and Tring station.
- Contribute towards off-site enhancements to the local road network, including but not limited to junction improvements along Chesham Road, A416/Shootersway and A4251/Berkhamsted High Street.

Social and community:

Provide three hectares of land for and deliver a new 2FE primary school.

Environmental Health:

• Investigate potential noise, air and light pollution impacts arising from the A41 and A4251 and identify appropriate mitigation measures as necessary.

Landscape Considerations:

Development will need to take account of and/or mitigate the following landscape sensitivities:

- relationship and views from and toward the Chilterns AONB surrounding the parcel and important views such as from the Ivinghoe Beacon;
- the relationship to the development pattern of Tring to the north and the sports facilities and light industrial yard to the west;
- the localised intervisibility with the open landscape and fields;
- urbanising influences of the A41 and London Road;
- the setting of the historic designed landscape of Tring Park, a grade II Registered Historic Park and Garden adjacent to the south-western boundary of the parcel;
- the existing and historic field boundary pattern; and
- the recreational value of the PRoW.

Biodiversity and Green Infrastructure:

 As part of delivering a net gain in biodiversity, investigate the existing Local Wildlife Site – Cow Lane Farm Meadows for its existing and future potential as a strategic wildlife corridor.

Historic, Environment and Cultural Heritage:

Ensure development of the site protects and where possible enhances the setting of nearby heritage
assets, including Tring Park (Registered Park and Garden), Pendley Manor, Dunsley Bungalow
and its associated cartshed and piggery, and Cow Lane Lodge to Pendley Manor (all Grade II listed).

Flood risk and Drainage:

- Surface water run-off rates as a result of development of the site should not exceed existing Greenfield run-off rates. Measures which achieve this should be discussed and agreed with Hertfordshire County Council's ecologist, flood engineer and the Environment Agency.
- Any development will need to have regard to the recommendations of the Level 2 Strategic Flood Risk Assessment for this site.



Growth Area Tr02: New Mill



Size (Hectares)	14.7 ha
Allocated for (key development and land use requirements)	 Around 400 new homes (including provision for older people), subject to masterplanning; and Public open space

Site-specific requirements

Urban Design Principles:

- Design codes will be developed alongside the preparation of any outline planning application and agreed by means of condition.
- The allocations New Mill and East of Tring should be planned together, preferably as a joint plan
 or as a minimum through closely aligned masterplans taking an integrated approach to the joint
 site area.
- Ensure high quality GI and sustainable transport linkages are provided with the adjacent allocation "East of Tring", including to the new community hub, local centre and primary and secondary schools.

Access, Highways and Sustainable Transport:

- Primary highway access to be provided via Bulbourne Road.
- Investigate secondary highway access onto Grove Road.
- Contribute towards new/enhanced pedestrian and cycle links with Tring town centre and Tring Station via East of Tring, including off site improvements.

Environmental Health:

• Undertake contaminated land investigations to ensure that the land is safe and suitable for the intended use.

Landscape Considerations:

Development will need to take account of and/or mitigate the following landscape sensitivities:

- views of and from the Chilterns AONB and from locations such as Ivinghoe Beacon within the AONB:
- screening of urbanising features within views such as the silos north of the parcel;



- the established vegetated buffers surrounding the parcel; and
- the existing development pattern along Grove Road and Netherby Close.

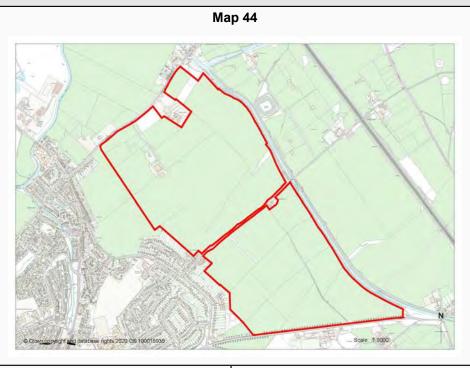
Biodiversity and Green Infrastructure:

As part of delivering a net gain in biodiversity, utilise new landscape mitigation measures and structure to develop new green infrastructure corridors and connect with other corridors in the area, including those proposed at *East of Tring*, such as the community hub spine.

Flood risk and Drainage:

 Flood Risk Assessment will need to address and where necessary mitigate a higher risk of ground water flooding on this site.

Growth Area Tr03: East of Tring



Size (Hectares)	119.11 ha
Allocated for (key development and land use requirements)	 Around 1,400 new homes (including provision for older people), subject to masterplanning. A new neighbourhood centre to include a sports/community hub. A new primary school (3ha). A new secondary school (13ha). Public open space.

Site-specific requirements

Urban Design Principles:

- Design codes will be developed alongside the preparation of any outline planning application and agreed by means of condition.
- The site will be brought forward with a masterplan showing a comprehensive phasing programme for development to be prepared in consort with the local planning authority.



- The allocations Tr03 East of Tring and Tr02 New Mill should be planned together, preferably as a
 joint plan or as a minimum through closely aligned masterplans taking an integrated approach to
 the joint site area.
- Ensure high quality green and blue infrastructure and sustainable transport linkages are provided with the adjacent allocation Tr02, including to the new community hub, local centre and primary and secondary schools.

Access, Highways and Sustainable Transport:

- Main vehicular access from Station Road and Bulbourne Road.
- A new link road (30mph) to be provided connecting Bulbourne road and Station Road.
- Provision and/or contributions to new/enhanced pedestrian and cycle links with Tring town centre and Tring Station, including off-site provision.
- Contribute towards off-site enhancements to the local road network, including but not limited to junction improvements along Bulbourne Road, Station Road, Cow Lane and London Road.

Social and community:

- The new neigbourhood centre should include new community facilities and a small parade of shops to serve the day-to-day needs of new and existing residents.
- Provide three hectares of land for and contribute towards the delivery of a new 3FE primary school and associated playing fields.
- Provide 13 hectares of land for and contribute towards the delivery of a new 6FE secondary school and associated playing fields.
- Deliver a new sports hub to serve existing and future residents of Tring and the surrounding area.

Environmental Health:

- Consideration should be given to Controlled Waters as a receptor to potential ground contamination.
- Undertake contaminated land investigations to ensure that the land is safe and suitable for the intended use.

Landscape Considerations:

Development will need to take account of and/or mitigate the following landscape sensitivities:

- the intervisibility with the wider landscape due to the elevated areas of the Chilterns AONB; namely
 prominent locations such as the Ridgeway National Trail, Ivinghoe Beacon and associated downland
 and chalk grassland, areas south of the parcel and along the AONB boundary;
- the historic field pattern; areas of complex topography with associated higher levels of intervisibility;
- well established internal and external hedgerows;
- a strong scenic quality from the agricultural landscape and enclosure of the parcel;
- the intact nature of areas of the parcel with few external influences; and
- tree lined skylines;

Biodiversity and Green Infrastructure:

- As part of delivering a net gain in biodiversity, create a new linear park along the entire north-eastern boundary of the site, to create a new green infrastructure and biodiversity corridor that runs parallel to the Grand Union Canal.
- Create a new green corridor linking the new woodland area to the north east with the existing built-up
 area of Tring along Marchcroft Lane to the adjacent allocation "New Mill".

Historic, Environment and Cultural Heritage:

- Development must conserve and where possible enhance the setting of a number of heritage assets in the area, including Pendley Manor, its stable and lodge, the canal bridge at Marshcroft Lane (all Grade II), and Marchcroft Lane (roman road).
- Development of the site should respect the setting and separate identify of Bulbourne to the north, which contains a number of designated and non-designated heritage assets.
- Archaeological investigations required to be undertaken.

Flood risk and Drainage:



- Surface water run-off rates as a result of development of the site should not exceed existing Greenfield run-off rates. Measures which achieve this should be discussed and agreed with Hertfordshire County Council's ecologist, flood engineer and the Environment Agency.
- Any development will need to have regard to the recommendations of the Level 2 Strategic Flood Risk Assessment for this site.

Growth Area Tr04: Icknield Way



Size (Hectares)	1 ha	
Allocated for (key development and land use	 Around 50 new homes, subject to 	
requirements	masterplanning	

Site-specific requirements

Urban Design Principles:

 Development of this site should follow the design principles set through the planning permission of the wider site.

Access, Highways and Sustainable Transport:

 Access to be provided by the new road being delivered immediately to the west of the site (permitted through application reference: 4/00958/18/MFA).

Environmental Health:

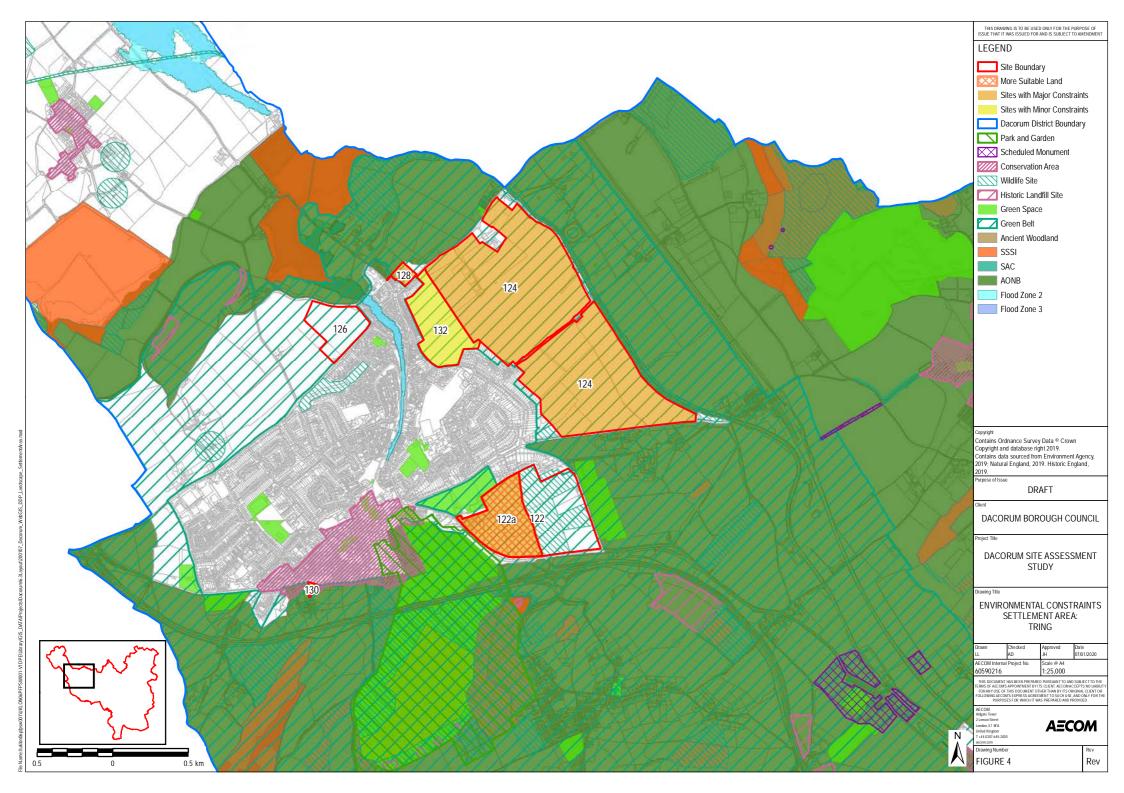
• Investigate potential air and noise pollution from the adjacent employment site and where necessary identify suitable mitigation.



Landscape Statement by Huskisson Brown Associates In response to the New Dacorum Local Plan (to 2038) June 2021

Appendix HBA 4 Dacorum Site Assessment Study. Extracts relating to Tring sites 122/122A, 124 and 132

2.12 Tring sites



Site Number: 122/122a	Site Name: Dunsley Farm	
Settlement	Tring	
Gross Area (ha)	37.25 (reduced site 122a: 16.4)	
Net Developable Area (ha)	29.8 (site 122a: 13.12)	
Current Use (Greenfield / Brownfield / Mixture)	Mixture	
Proposed Use	Residential	
Design Case Study	17.5 dph (applied to site 122a only)	
Gross Density (dph)	17.5	_
Net Density (dph)		
Gross dwelling Capacity (dwellings)	287	
Employment floorspace capacity (sq. m, net)	n/a	
Transport conclusion	The site is accessible from the local road network (London Road and Cow Lane); local factorial available; good access to public transport.	ilities
Flooding conclusion	The site is shown to be susceptible to surface water flooding. Flow routing and drainage requirements must be considered early in the site planning process to ensure the risk is el managed on site and the risk to neighbouring areas is not increased and where possible is There are recorded incidents of flooding recorded by Hertfordshire CC. This information sl reviewed during the site planning process. As the site is greater than 1 hectare a Flood Ri Assessment will be required to accompany a planning application.	s reduced. nould be
In Green Belt?	Yes	_
Green Belt Review Overall Conclusions	Sub-area may partially compromise the ability of the wider Green Belt to meet its purposes includes an area of weaker Green Belt - consider part of the sub-area further.	s but
Geo-environmental	The site is underlain by a Principal Aquifer associated with the Holywell Nodular Chalk For and New Pit Chalk Formation and therefore consideration should be given to Controlled Wireceptor to any potential ground contamination.	
Agricultural land quality grade	2 and 3	
Existing use	Agriculture and farm buildings, and small-scale commercial	
	Neighbouring land use:	
Housing	Industrial Agricultural Social infrastructure Ot	her uses
х	х	х
Conclusion on potential land use based on neighbouring uses	Residential	
Potential for mix of housing types-conclusion	Scale of site is large enough to support full range of housing types highlighted as needed the SHMA, from 1 bed to 4+ bed, as well as specialist housing, e.g. for older people.	through
Heritage assets	The site abuts London Road with a broad (25m) band of trees between the road and the Clisted Tring Park RPG (NHLE 1000218). The Grade II listed London Lodge to Tring Park (1077997) is approx. 70m south of the site within the RPG but is screened by trees between and the road. The site is separated from the Tring Conservation Area by the RPG. The site adjacent to the area of archaeological significance DAC_7 and in close proximity to DAC_such it is possible that an archaeological evaluation may be required in advance of developments.	NHLE n the site e is 6, and as

Site Number: 122/122a

Site Name: Dunsley Farm

Landscape and Visual Impact

The site is not within the Chilterns AONB but may impact the setting of the Chilterns AONB due to its close proximity. The site is within LCA 114 of the DLCA; the condition of the LCA is described as moderate, and the strength of character of the LCA is described as moderate. The site has a gentle fall from south to north and comprises mainly small-scale mixed farmland, with fields bounded by hedgerows and intermittent trees. The site is defined by London Road to the south, beyond which is the A41. The main built-up area of Tring is to the north. A supermarket is located to the west of the site. A scarp of the AONB is to the south of the A41, across which the Ridgeway National Trail passes. A public footpath crosses the site. Overall, the site is judged to perform reasonably on this criterion but with major constraints as a result of the potential for impacts on the setting of the AONB

Regeneration potential- indices of Multiple Deprivation score

10% least deprived

Regeneration potential- Indices of Multiple Deprivation (surroundings)

20% least deprived

Economic development potential

The businesses located in proximity to the site attract a very well-qualified workforce that hold high-level occupations. The workers for these businesses tend to live fairly close by and travel sustainably for the area. In addition, the site is located next to Tring Station providing good access to the site. Tring is identified as a "place with limited opportunity" for economic development in the Core Strategy. In addition, a similar site to this was assessed within the Dacorum Land Availability Assessment 2017 which suggested it was not viewed as an office location by the market however, there is potential for local industrial uses. Therefore, the site does appear to be suitable for economic development with housing developments close by allowing Tring to become a focus for homes and jobs as suggested in the Local Plan Consultation 2017.

Environmental designations

Local Wildlife Site intersects the bulk of the eastern half of the site, and this is a fundamental constraint to development of this area. The pattern of land designated as Local Wildlife Site also cuts off some undesignated land to its east from the rest (i.e. the western part) of the site.

Spatial Opportunities and Constraints- local character and history

The site would be a large extension to Tring. The location would be moderately sympathetic to existing character and history by respecting the existing settlement pattern.

Spatial Opportunities and Constraints-coalescence risk

No risk of coalescence with other settlements and contributes towards maintaining a sense of place.

Spatial Opportunities and Constraintsdefensible boundary potential

Clear defensible boundaries from the A41/A4251 in the south and Cow Lane to the east.

Noise and pollutionbad neighbour uses?

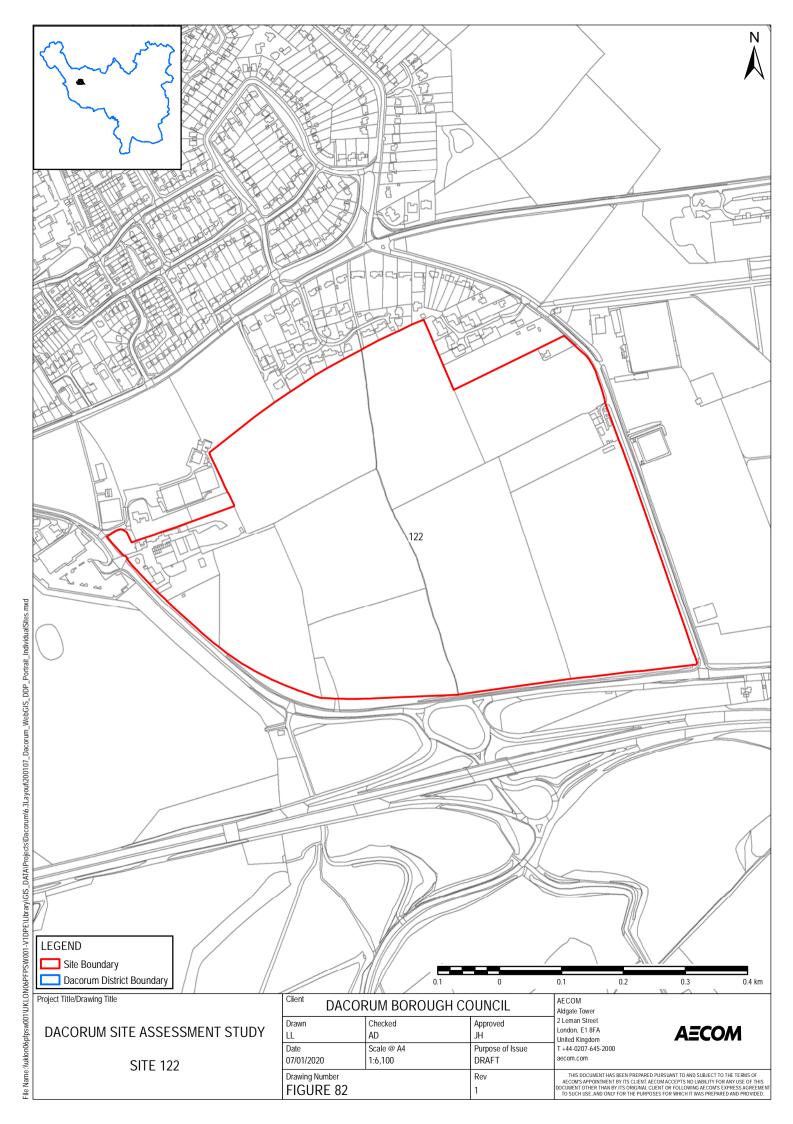
None found

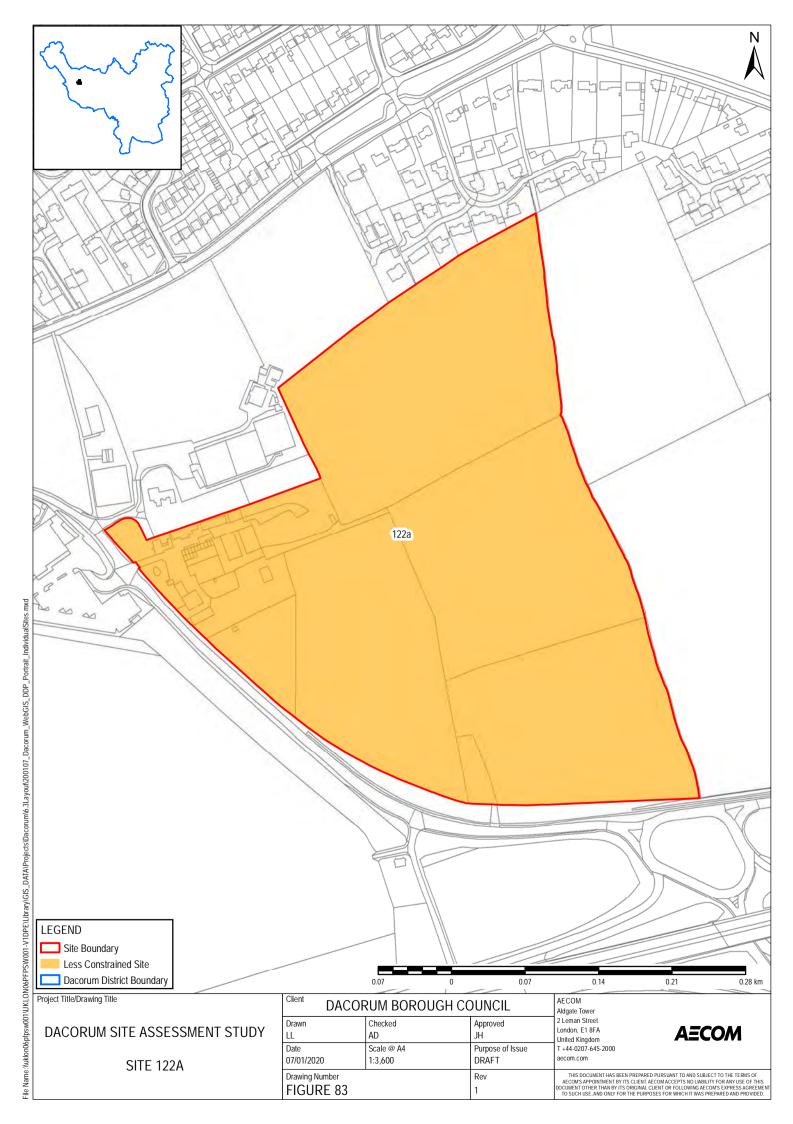
Overall site conclusion-comments

Site's most significant constraints are flood risk, Local Wildlife Site across half of the site, Green Belt and the setting of the AONB, as well as environmental features. Other than these, site performs relatively well. Given that the Local Wildlife Site is the most fundamental of these constraints and is not able to be mitigated, it is recommended that site boundaries are amended to form a new site 122a that includes only the western half of the site, thus excluding the Local Wildlife Site. While it is noted that there is some land in the east of the original site that is not within the wildlife designation, the necessary boundary amendment would act to cut this land off from the rest of the site and thus development in this location would form isolated new houses in the countryside away from the settlement edge, which is resisted by national policy. The allocation of 122a could be offset by compensatory improvements to that part of the site not allocated but remaining within the Green Belt and in the same ownership, in line with NPPF paragraph 138. Site 122a is therefore considered to be potentially suitable for allocation with major constraints.

Overall site conclusion- final rating

Site 122a only is potentially suitable for allocation with major constraints.





Site Number: 124	Site Name: Land East of Tring	
Settlement	Tring	
Gross Area (ha)	119.11	
Net Developable Area (ha)	95.29	
Current Use (Greenfield / Brownfield / Mixture)	Greenfield	
Proposed Use	Residential	
Design Case Study	17.5 dph	
Gross Density (dph)	17.5	
Net Density (dph)		
Gross dwelling Capacity (dwellings)	2,084	
Employment floorspace capacity (sq. m, net)	n/a	
Transport conclusion	The site is accessible from the local road network (Bulbourne Road, Station Road - Marshcroft Lane is not suitable for vehicular access); local facilities available; good access to public transport.	
Flooding conclusion	The site is shown to be susceptible to surface water flooding. Flow routing and drainage requirements must be considered early in the site planning process to ensure the risk is effectively managed on site and the risk to neighbouring areas is not increased and where possible is reduced. The Grand Union Canal forms the eastern boundary of the site. There are recorded incidents of flooding recorded by Hertfordshire CC (source of flooding not specified). This information should be reviewed during the site planning process. As the site is greater than 1 hectare a Flood Risk Assessment will be required to accompany a planning application.	
In Green Belt?	Yes	
Green Belt Review Overall Conclusions	Sub-area would compromise the ability of the wider Green Belt to meet its purposes - exclude from further consideration	
Geo-environmental	The site is underlain by a Principal Aquifer associated with the West Melbury Marly Chalk Formation and Zig Zag Chalk Formation, and therefore consideration should be given to Controlled Waters as a receptor to potential ground contamination. In addition, aerial imagery for the site indicates the presence of two large unknown heaps located within the northernmost field, dated 1999-2017, and therefore a conservative "high risk" assessment has been attributed to the site due to the unknown composition of the heap, considered to be a potential source of on-site contamination.	
Agricultural land quality grade	2 and 3	
Existing use	Agriculture and farm buildings	
	Neighbouring land use:	
Housing	Industrial Agricultural Social infrastructure Other uses	
х	Х	
Conclusion on potential land use based on neighbouring uses	Residential	
Potential for mix of housing types-conclusion	Scale of site is large enough to support full range of housing types highlighted as needed through the SHMA, from 1 bed to 4+ bed, as well as specialist housing, e.g. for older people.	
Heritage assets	A large site to the north east of Tring bounded by the B488 Bulbourne Road to the north west, the Grand Union Canal to the north east and Station Road to the south. The site is bisected by Marshcroft Lane which crosses the canal on a Grade II listed bridge Grand Union Canal Bridge Number 134 (High Bridge) at Marshcroft Lane (NHLE 1342201). This is well screened from the site and its setting, the canal, will not be affected. The Grade II listed Grove Farm Cottages (NHLE 1078031) at the other end of the road are approx. 180m from the site's boundary and now in a suburban setting. The site lies within the archaeological area of significance of DAC_6 and in close proximity to that of DAC_7, and as such would require a programme of archaeological evaluation in advance of development.	

Site Number: 124 Site Name: Land East of Tring

The site is not within the Chilterns AONB but may impact the setting of the Chilterns AONB due to its close proximity. The site is within LCA 114 of the DLCA; the condition of the LCA is described as moderate, and the strength of character of the LCA is described as moderate. The site is gently undulating and covers arable farmland between the north-east edge of Tring and the Grand Union Landscape and Visual Canal. The farmland is divided by hedgerows and intermittent trees. The site is not fully contiguous **Impact** with Tring's settlement pattern. The Grand Union Canal is lined by a dense belt of mature trees, and has public footpaths along each side. Overall, the site is judged to perform reasonably on this criterion but with major constraints as a result of the potential for impacts on the setting of the AONB and Grand Union Canal and the vegetation patterns across the site. Regeneration potential- indices of 10% least deprived **Multiple Deprivation** score Regeneration potential-Indices of 20% least deprived **Multiple Deprivation** (surroundings) The businesses located in proximity to the site attract a very well-qualified workforce that hold highlevel occupations. The workers for these businesses tend to live fairly close by and travel

Economic development potential

Environmental

The businesses located in proximity to the site attract a very well-qualified workforce that hold high-level occupations. The workers for these businesses tend to live fairly close by and travel sustainably for the area. In addition, the site is located next to Tring Station providing good access to the site. Tring is identified as a "place with limited opportunity" for economic development in the Core Strategy; however, this site appears to be very suitable for economic development with housing developments close by allowing Tring to become a focus for homes and jobs as suggested in the Local Plan Consultation 2017.

designations Spatial Opportunities and Constraints- local

Adjacent to two Local Wildlife Sites.

and Constraints- local character and history

The site would be a significant increase to the existing size of Tring. It would link Tring Station to the main town, which appears a logical place to develop in terms of character and history.

Spatial Opportunities and Constraintscoalescence risk

There would be coalescence of existing built form but this would be between two separate parts of Tring, and would effectively bring Tring railway station into the built-up area, so could in fact be beneficial.

Spatial Opportunities and Constraintsdefensible boundary potential

Development of this site would create a strong defensible boundary for Tring from the Grand Union Canal

Noise and pollutionbad neighbour uses?

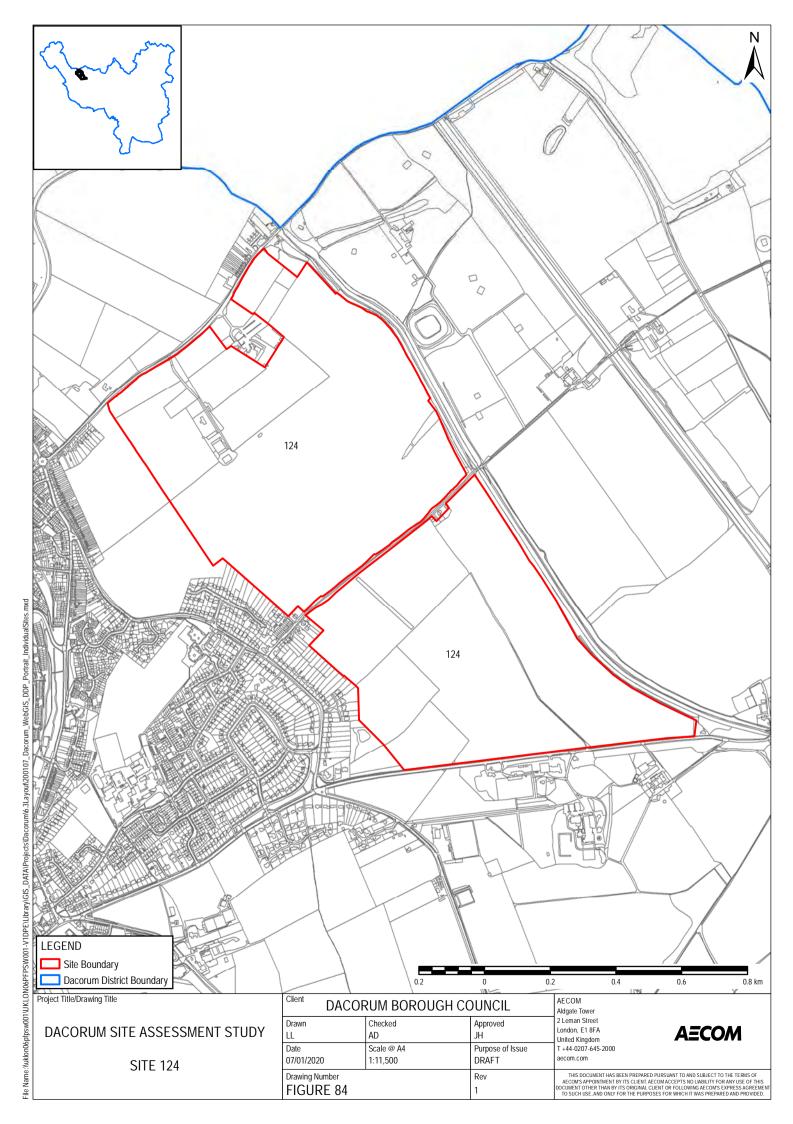
None found

Overall site conclusion-comments

Site has significant contraints in terms of Green Belt, and also performs relatively poorly on heritage, landscape (including AONB setting) and agricultural land quality. However, its Green Belt constraints are considered to be outweighed by its slightly better performance on these latter criteria, combined with even better performance on other criteria. Additionally, scale of the site and ability to deliver significant growth, i.e. regeneration and economic benefits, are further major advantages. As such, the site is considered potentially suitable for allocation but with major constraints.

Overall site conclusion- final rating

Potentially suitable for allocation with major constraints.



Site Number: 132	Site Name: New Mil	II		
Settlement	Tring			
Gross Area (ha)	14.70			
Net Developable Area (ha)	11.76			
Current Use (Greenfield / Brownfield / Mixture)	Greenfield			
Proposed Use	Residential			
Design Case Study	F			
Gross Density (dph)	25			
Net Density (dph)	33.5			
Gross dwelling Capacity (dwellings)	367			
Employment floorspace capacity (sq. m, net)	n/a			
Transport conclusion			(Grove Road - also Bulbourne Ro able; good access to public transp	
Flooding conclusion	The site is shown to be susceptible to surface water flooding. Flow routing and drainage requirements must be considered early in the site planning process to ensure the risk is effectively managed on site and the risk to neighbouring areas is not increased and where possible is reduced. As the site is greater than 1 hectare a Flood Risk Assessment will be required to accompany a planning application.			
In Green Belt?	Yes			_
Green Belt Review Overall Conclusions	Sub-area may partially compromise the ability of the wider Green Belt to meet its purposes but includes an area of weaker Green Belt - consider part of the sub-area further.			
Geo-environmental	The site is underlain by a Principal Aquifer associated with the West Melbury Marly Chalk Formation and Zig Zag Chalk Formation and therefore consideration should be given to Controlled Waters as a receptor to any potential ground contamination. In addition, aerial imagery for the site indicates the presence of an unknown heap, dated 1945, within the centre of the site and another dated 2006 within the northern corner of the southern field, therefore a conservative "high risk" assessment has been attributed to the site due to the unknown composition of the heap, which is considered to be a potential source of on-site contamination.			
Agricultural land quality grade	3			
Existing use	Agriculture			
		Neighbouring land use:		
Housing	Industrial	Agricultural	Social infrastructure	Other uses
x		x		
Conclusion on potential land use based on neighbouring uses	Residential			
Potential for mix of housing types-conclusion		it is large enough to support also specialist housing for o	full range of housing types, from older people	smallest to
Heritage assets	The Grade II listed New Mill Tring Baptist Church with Adjoining Schoolroom and 2 Cottages, in Graveyard (NHLE 1078001) is approx. 230m south west of the site but is completely screened from it by buildings to either side of the B488. There are no other designated assets nearby.			

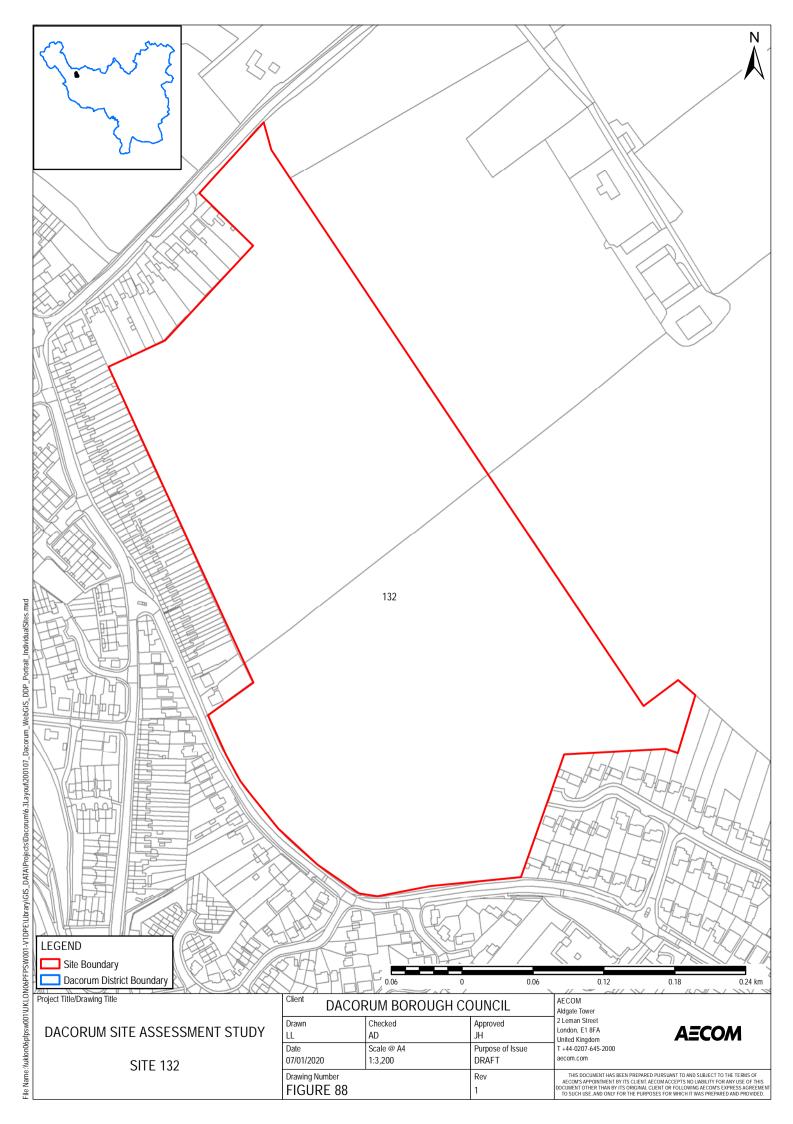
Site Number: 132 Site Name: New Mill

conclusion- final

rating

The site is not within the Chilterns AONB but may impact the setting of the Chilterns AONB due to its proximity. However the majority of the developable area of the site is relatively limited in AONB impact, and indeed the northern half of the site, physically closest to the AONB, slopes down away from it in parts. The site is within LCA 114 of the DLCA; the condition of the LCA is described as moderate, and the strength of character of the LCA is described as moderate. The site has a gently Landscape and Visual rolling landform and comprises two pastoral fields between residential land uses adjacent to the Impact B488 and Grove Road. The fields are divided by a hedgerow with intermittent trees, and have a well-defined linear belt of trees along their north-eastern boundary. The other boundaries to the fields are made up of the Tring settlement edge. Overall, the site is judged to perform reasonably on this criterion but with major constraints as a result of the potential for impacts on the setting of the AONB. Regeneration potential- indices of 10% least deprived **Multiple Deprivation** score Regeneration potential-Indices of 20% least deprived **Multiple Deprivation** (surroundings) The businesses located in proximity to the site attract a very well-qualified workforce that hold highlevel occupations. The workers for these businesses tend to live fairly close by and travel **Economic** sustainably for the area. In addition, the site is located near Tring Station providing good access to development the site. Tring is identified as a "place with limited opportunity" for economic development in the potential Core Strategy; however, this site appears to be very suitable for economic development with housing developments close by. Environmental None designations **Spatial Opportunities** The site would be sympathetic in scale and location as it would be in keeping with the existing and Constraints- local 'triangle' pattern of Tring. character and history **Spatial Opportunities** and Constraints-No risk of coalescence with other settlements and contributes towards maintaining a sense of place. coalescence risk **Spatial Opportunities** and Constraints-Clear defensible boundaries except to the east with open fields. However development here would defensible boundary connect development on Grove Road. potential Noise and pollution-None found bad neighbour uses? Site performs relatively poorly in terms of current status as Green Belt and lies within setting of **Overall site** AONB, but in spatial terms, the majority of the site's developable area is relatively limited in terms of conclusionits visual relationship with the AONB. Its performance across other criteria is strong, and in combination, this indicates the site is considered potentially suitable for allocation with minor comments constraints. **Overall site**

Potentially suitable for allocation with minor constraints.



Landscape Statement by Huskisson Brown Associates In response to the New Dacorum Local Plan (to 2038) June 2021

Appendix HBA 5

Dacorum Borough Landscape Sensitivity Study. Extracts relating to Tring sites 122/122A, 124 and 132

Parcel 122 - Dunsley Farm



Location plan

Parcel 122 falls within character area 114 Tring Gap Foothills within the Dacorum Landscape Character Assessment.

The susceptibility, value and sensitivity of the landscape to change resulting from residential development are discussed below.

Evaluation of landscape value

The Landscape parcel is assessed as having *neighbourhood* landscape value in light of the following:

- The parcel's moderately intact condition;
- a number of features demonstrate the parcel's high representativeness of wider landscape character as described in the key characteristics of the Tring Gap Foothills LCA from the Dacorum Borough Character Assessment: views to the Chilterns escarpment, framing and containment by wooded scarp slopes, parkland landscapes at Tring Park, mixed open farmland, urban fringe influences around Tring including; residential sports pitches and arterial transport corridor including the A41;
- the parcel has no designations within it;
- the recreational value attached to a PRoW which passes through the parcel, serving the local neighbourhood; and
- The parcel exhibits a generally intact field boundary pattern of local cultural value.



Parcel context plan

Table 34 - Landscape susceptibility

Criterion	Comment	Susceptibility score
Landform	The landform within the parcel is gently rising from the north to the south, but the level change is largely imperceptible within the parcel.	
	The parcel forms part of the southern end of the plateau around Tring which rises up more steeply south of the A41.	
	The landform influences the parcel by allowing for open views across the farmland and maximising the influence of intervening vegetation. However the gentle slope allows for long distance views across the wider plateau. It also minimises the relationship between the east of the parcel and the adjacent area of Chilterns AONB.	Low-Moderate
	The gently undulating character of the landform results in a low-moderate susceptibility.	
Development character and edges	The main developed edge of the parcel is along the northern boundary. Along the eastern half of this staggered edge is an area of residential development which has breached the pattern of arable fields south of Station Road. The boundaries along this edge are mixed back garden boundaries with a varied degree of screening of the properties; generally the boundaries are well established hedges or hedgerows coupled with trees in back gardens which strengthen the boundaries.	
	There is a light industrial yard including a brewery within the western area of the parcel; it has established hedgerows surrounding it which screen most of the urbanising influence of the buildings and clutter in the yard, but the barns or warehouses are visible above them.	Moderate
	The other boundaries and internal field boundaries are generally well established hedgerows with intermittent trees. The southern boundary appears slightly overgrown and less well managed.	
	The proximity to development influences which are visible at points results in a moderate susceptibility.	
Perception (including scenic quality, sense of tranquillity and separation from urbanising influences)	The scenic quality is influenced by the arable landscapes largely enclosed by the surrounding hedgerows with a rural character, however detracting features include degraded agricultural landscapes with degraded boundaries at the southern entrance, the glimpsed views of London Road (B4635) and partial views of built development to the north.	
	The level of tranquillity of the parcel is mixed with lower levels close to the degraded agricultural landscape, urbanising built features and road noise of London Road and the A41 beyond.	Moderate
	There is a varied level of separation depending on the quality of the boundary treatments. Generally; in locations away from urbanising features the levels are higher but background road noise is still present.	
	Given the above, susceptibility is moderate.	



Parcel aerial plan

Criterion	Comment	Susceptibility score
Scale and pattern, including cultural pattern	The parcel is made up of a range of different sized fields; small pastoral paddocks to large arable fields. Generally the field pattern is rectilinear and is largely unchanged since the 1900's historic OS map was produced other than the light industrial yard and the development north of the parcel. The parcel is relatively contained with little relationship with the wider landscape including the eastern fields of the parcel which have minimal visual connection to the adjacent Chilterns AONB. The poor level of connectivity with the wider landscape is due to the surrounding areas having different land uses and characteristics to those of the parcel: residential to the north, sports pitches to the north west and east, scattered out of town development and Tring Park - a Designated Park and Gardens surrounded by a strong, enclosing boundary to the west and an infrastructure corridor segregating the parcel from agricultural land to the south. The relatively simple pattern results in a moderate susceptibility.	Moderate
Skylines, visual and views	The skyline is influenced by a combination of the surrounding trees and field boundaries and the distant wooded ridgeline to the north across the Tring plateau. The skyline to the south is influenced by the rising topography and wooded ridge south of the parcel which creates some degree of intervisibility with the Chilterns AONB. Most views are across the open and relatively flat agricultural fields with some limitation by the field boundaries. The views north over the hedgerows include many of the rooflines and streetlights of Tring's residential areas and glimpses of distant wooded rolling hillsides. Landmarks include the distance views of the rolling hillside including the Ivinghoe Beacon within the AONB. These elements elevate susceptibility to moderate-high.	Moderate-High
	Overall susceptibility to change	Moderate



- 1. A view across the flat agricultural fields of the parcel with glimpsed views of development within Tring beyond the mixed hedgerows within and surrounding the parcel.
- 2. Scrub planting and poorly managed or degraded agricultural landscape.
- 3. A panoramic view with intimate field pattern with internal boundaries and long distance views with wooded horizons and the rounded hilltops near Cheddington including the Ivinghoe Beacon within the Chilterns AONB.







Note: Views from viewpoints were considered from the surrounding area, specifically from Ivinghoe Beacon and the Ridgeway National Trail and from Tring Park all of which are within the Chilterns AONB; but due to survey restrictions and the Covid-19 pandemic, photos were not obtained.

Evaluation of landscape susceptibility:

The parcel is assessed as having an overall rating of *Moderate* landscape susceptibility to change arising from residential and mixed-use development.

This is primarily a result of the parcel's limited relationship with much of the surrounding AONB and combination of positive rural characteristics surrounded by urbanising influences.

Overall landscape sensitivity:

Taking account of the assessment of landscape value and susceptibility, the parcel is assessed as having a *Moderate* overall sensitivity to change arising from residential and mixed-use development. This is due to the landscape's agricultural character and landscape which has degraded in places, and the presence of urban fringe influences.

In the Landscape Appraisal, part of the Stage 2 Greenbelt Assessment this parcel formed part of Tring TR-A5 which found *medium* sensitivity, which is broadly consistent with the findings of this report.

Landscape guidance and principles for development:

Any development in this location should take careful account of and mitigate the following sensitivities:

- the relationship and views from and toward the Chilterns AONB surrounding the parcel and important views such as from the Ivinghoe Beacon;
- the relationship to the development pattern of Tring to the north and the sports facilities and light industrial yard to the west;
- the localised intervisibility with the open landscape and fields
- urbanising influences of the A41 and London Road;
- the setting of the historic designed landscape of Tring Park, a grade II Registered Historic Park and Garden adjacent to the south-western boundary of the parcel;
- the existing and historic field boundary pattern; and
- the recreational value of the PRoW.

The potential design response for any residential and mixed use development should:

- consider views from the PRoW, Tring Park and Chilterns AONB and avoid highly intervisible locations within the parcel or adopt screening appropriate to the existing character;
- tie into the existing development pattern of Tring and the adjacent light industrial units to the west of the parcel;
- explore opportunities to mitigate the effects of the urbanising A41 and London Road to the south of the parcel.

Parcel 124 - East of Tring



Location plan

Parcel 124 falls within character area 114 Tring Gap Foothills within the Dacorum Landscape Character Assessment.

The susceptibility, value and sensitivity of the landscape to change resulting from residential development are discussed below.

Evaluation of landscape value

The Landscape parcel is assessed as having *neighbourhood* landscape value in light of the following:

- The parcel's highly intact condition;
- a number of features demonstrate the parcel's high representativeness of wider landscape character as described in the key characteristics of the LCAs from the Dacorum Borough Character Assessment: views to the Chilterns escarpment, transport corridor including the Grand Union Canal, mixed open farmland, Pendley Manor, urban fringe influences around Tring including a garden centre;
- The parcel has no designations within it but forms the setting for the Chilterns AONB and is a continuation of the rural aspects of the AONB's character;
- The parcel has no recreational value within other than a long distance PRoW along the Grand Union Canal; and
- The parcel exhibits a largely intact field boundary system of local cultural value.



Parcel context plan

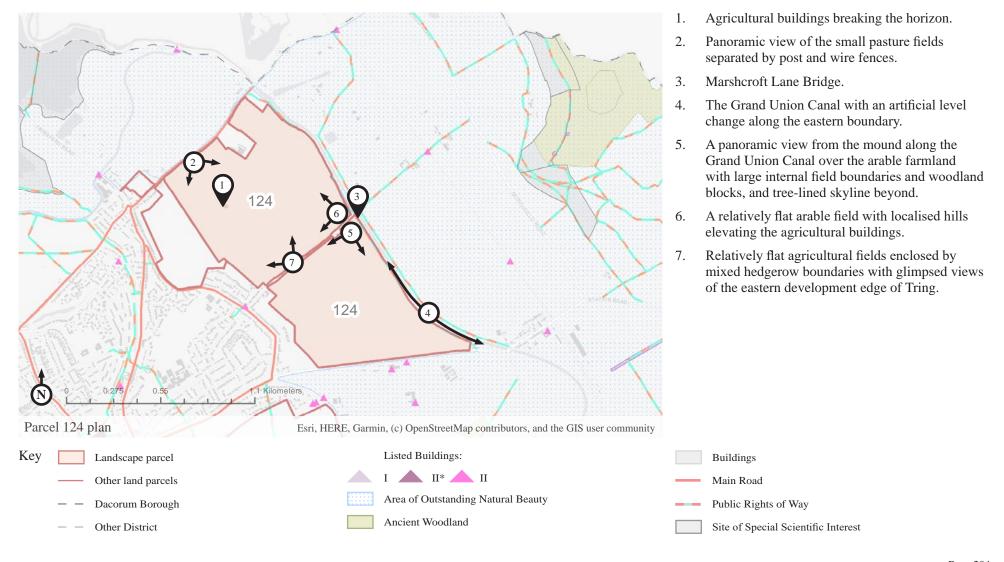
Table 35 - Landscape susceptibility

Criterion	Comment	Susceptibility score
Landform	The landform within the parcel is relatively flat across much of the parcel with a gradual rise from the northeast to the south-west.	Moderate- High
	The north-west of the parcel has a localised rounded mound and a more complex topography.	
	The localised mound elevates the built structures located on it and makes them a visually prominent feature from many of the views. Otherwise the landform has limited affect.	
	South of the parcel the landform is a largely flat plateau surrounding Tring. North of the parcel the landform falls toward the Grand Union Canal and a number of reservoirs.	
	The landform rises up in a relatively localised area along the eastern boundary but is intersected by the Grand Union Canal which is dug below ground level creating steep embankments.	
	Localised landform variations result in a moderate-high susceptibility.	
	The parcel is situated between the development edge of Tring and the Grand Union Canal.	
	The Grand Union Canal is dug into the landscape and has strong buffer planting along its edge.	Moderate- High
	The development edge of Tring has a mixture of boundary treatments creating differing degrees of separation; generally the edge is made up of vegetated back garden hedges or dense hedgerows.	
Development character and	South of the parcel is the tree-lined Station Road which separates the parcel from a woodland block and the designed landscape of Pendley Manor.	
edges	North of the parcel and surrounding the garden centre complex is Bulbourne Road with a mixture of fences, hedgerows and belts of trees.	
	Internal boundaries are generally well established or outgrown hedgerows with occasional to frequent trees. In the north-western corner there is a concentration of post and wire fences for livestock.	
	The sense of integration of the settlement edge results in a moderate-high susceptibility.	
Perception (including scenic quality, sense of tranquillity and separation from urbanising influences)	The scenic quality is influenced by the large open patchwork of fields which largely feels separate from the developed area of Tring. The localised elevated landform creates intervisibility with the wooded ridge within the Chilterns AONB to the south.	Moderate- High
	The level of tranquillity of the parcel is generally high as there are few urbanising features however localised areas have lower levels of tranquillity such as around the garden centre, along the development edge of Tring where the sense of separation is lower or along Bulbourne or Station Roads which are influenced by road noise.	
	The strong sense of scenic quality and tranquillity result in a moderate-high susceptibility.	



Parcel aerial plan

Criterion	Comment	Susceptibility score
Scale and pattern, including cultural pattern	The parcel is made up of a large number of arable fields. The structure of the fields differs on either side of Marshcroft Lane with a more open, larger scale pattern to the north and a more tight knit pattern which is almost the exact field pattern shown on the 1900's historic OS map to the south. The parcel is between the developed area of Tring and the Grand Union Canal with a wider agricultural landscape beyond. However the landform and vegetation surrounding the Grand Union Canal and Bulbourne Road reduce the connectivity with these areas. Similarly the southern boundary along Station Road is strong and separates it from a landscape with a different rural character. Areas of more intact landscape pattern elevate susceptibility to moderate-high.	Moderate- High
Skylines, visual and views	The skyline is influenced by the topography and surrounding vegetation, plus the localised mound along the Grand Union Canal and rising land along Bulbourne Road. Views to the south are influenced by the ridgeline within the Chilterns AONB. The agricultural buildings on the localised mounds influence the skyline and create landmarks within the surrounding views of the parcel. Enclosure along the Grand Union Canal restricts intervisibility with the adjacent area of the Chilterns AONB. Views of the developed area of Tring are semi-screened by the back garden boundaries. Naturalistic skylines and long views to the AONB, including glimpsed views toward the Ivinghoe Beacon and the Ridgeway National Trail, elevate susceptibility to moderate-high.	Moderate- High
	Overall susceptibility to change	Moderate- High





Note: Views from viewpoints within the surrounding area, specifically from locations on the Ridgeway National Trail within the within the Chilterns AONB, were considered, but due to survey restrictions and the Covid-19 pandemic, photos were not obtained.

Evaluation of landscape susceptibility:

The parcel is assessed as having an overall rating of *Moderate-High* landscape susceptibility to change arising from residential and mixed-use development.

This is primarily a result of the intervisibility with the Chilterns AONB, large area of open agricultural land and lack of intrusive urbanising influences which creates a high scenic quality.

Overall landscape sensitivity:

Taking account of the assessment of landscape value and susceptibility, the parcel is assessed as having a *Moderate-High* overall sensitivity to change arising from residential and mixed-use development. This is due to the landscape's level of susceptibility and the fact that the parcel provides a setting for the Chilterns AONB. The landscape sensitivity in the fields of Marshcroft Lane south is also assessed as having *Moderate-High* sensitivity to change, but for different reasons to the rest of the parcel. There is reduced intervisibility caused by the lower and flatter topography and surrounding vegetation but there is a more intricate field pattern so is more sensitive in terms of scale, pattern and cultural pattern compared with the land north of Marshcroft Lane.

In the Landscape Appraisal, part of the Stage 2 Greenbelt Assessment this parcel formed part of study areas: Tring TR-A2 which found *medium* sensitivity and Tring TR-A3 which found *high* sensitivity which aligns with the variation of landscape sensitivity in the parcel, and therefore is consistent with the findings of this report.

Landscape guidance and principles for development:

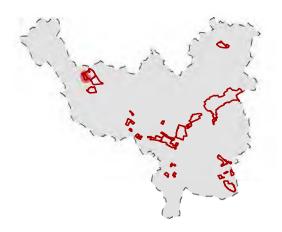
Any development in this location should take careful account of and mitigate the following sensitivities:

- the intervisibility with the wider landscape due to the elevated areas of the Chilterns AONB; namely prominent locations such as the Ridgeway National Trail, Ivinghoe Beacon and associated downland and chalk grassland, areas south of the parcel and along the AONB boundary;
- the historic field pattern;
- areas of complex topography with associated higher levels of intervisibility;
- well established internal and external hedgerows;
- a strong scenic quality from the agricultural landscape and enclosure of the parcel;
- the intact nature of areas of the parcel with few external influences; and
- tree lined skylines;

The potential design response for any residential and mixed use development should:

- take careful account of areas with increased intervisibility, particularly with the Chilterns AONB, due to topography or openness should be avoided or screened by bolstered hedgerows appropriate to the character;
- conserve and enhance the historic field pattern and established hedgerows;
- conserve the scale of pattern in the more intimate areas to the east of the parcel; and
- explore opportunities to reduce the influence of road noise from Bulbourne or Station Roads and views of development such as the garden centre or agricultural silos.

Parcel 132 - New Mill



Location plan

Parcel 122 falls within character area 114 Tring Gap Foothills within the Dacorum Landscape Character Assessment.

The susceptibility, value and sensitivity of the landscape to change resulting from residential development are discussed below.

Evaluation of landscape value

The Landscape parcel is assessed as having *neighbourhood* landscape value in light of the following:

- The good condition of the landscape due to the level of intactness;
- a number of features demonstrate the parcel's moderate representativeness of wider landscape character of Character Area 114 Tring Gap Foothills as described in the key characteristics of the LCAs from the Dacorum Borough Character Assessment: mixed open farmland, and urban fringe influences of Tring; and
- there is limited recreational value attached to the parcel serving only as a backdrop to the settlement with amenity value for the local neighbourhood.



Parcel context plan

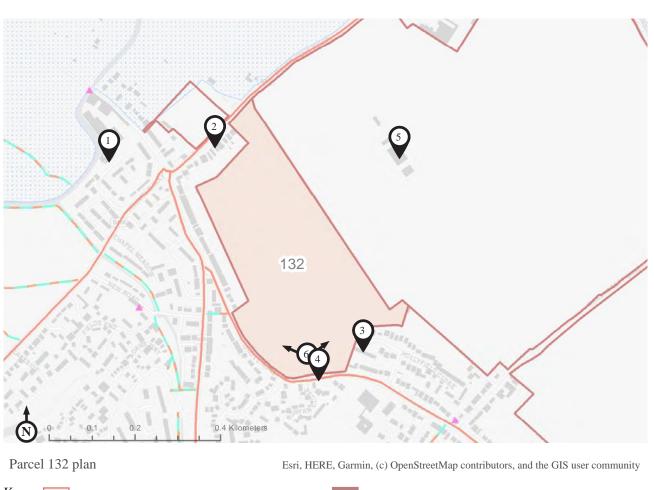
Table 37 - Landscape susceptibility

Criterion	Comment	Susceptibility score
Landform	The landform within the parcel is relatively flat with gentle undulations which creates a slight depression between the northern and southern fields with an unusually localised rounded mound occupying the middle of the northern field.	
	Surrounding the parcel the landform is generally relatively flat with gentle undulations other than the area surrounding the Grand Union Canal to the north of the parcel which is lower but has little influence over the parcel.	Moderate
	The landform influences the parcel by creating a gently undulating landscape which is open, but the depression between the two fields reduces the presence of the hedgerow and the mound screens views of some development to the north. Similarly the Bulbourne Road (B488) restricts intervisibility with the AONB.	
	The level of landform undulation results in a moderate susceptibility.	
Development character and edges	The settlement edge on the north and west of the parcel has eroded the original field pattern. The development on these edges generally have a linear pattern of vegetated rear gardens facing onto the parcel.	
	In the south eastern corner of the parcel the residential development has a combination of back gardens and sides of properties lining the edge with a mixture of mixed hedgerow and trees and some shorter hedges to the sides of gardens which partially encloses the development.	Moderate
	The north and east of the parcel is enclosed by mixed, mature hedgerows with similar open agricultural fields beyond.	Moderate
	The southern edge of the parcel is defined by Grove Road and a dense, mature hedgerow and trees.	
	The proximity to development results in a moderate susceptibility.	
Perception (including scenic quality, sense of tranquillity and separation from urbanising influences)	The scenic quality is influenced by the open nature of the agricultural land and well vegetated enclosures although the perception of being removed from the urban area is slightly reduced as a result of development surrounding the parcel on three of four sides and only being partially screened in places.	
	The level of tranquillity of the parcel is relatively high as there is a strong agricultural character and the residential areas surrounding the parcel are relatively quiet and unobtrusive. However; the northern area of the parcel has a slightly lower sense of tranquillity due to the road noise of the Bulbourne Road (B488).	Moderate
	An urbanising influence is the views of the industrial / agricultural silos which are visible from most of the parcel which reduce susceptibility to moderate.	



Parcel aerial plan

Criterion	Comment	Susceptibility score
Scale and pattern, including cultural pattern	The parcel is made up of two relatively rectilinear, medium sized fields within a context of similarly shaped large fields north west of Tring. The settlement edges on the northern-western edge and the south eastern corner of the parcel has eroded the original field pattern; however, this pattern is largely unchanged since the 1900's as shown on a historic map. The relatively simple landscape pattern results in a moderate susceptibility.	Moderate
Skylines, visual and views	The skyline is influenced by the mixed boundaries separating the parcel from the surrounding development of Tring which provides good to moderate screening of the built form; although, there are glimpsed views of development surrounding the parcel on most sides. A point of interest is the localised mound in the northern field which creates a rounded horizon and short to mid-distance views from the south of the parcel and elevated views into the residential areas of Tring from the northern field. The industrial / agricultural silos create a local landmark north west of the parcel. There are limited views of the surrounding Chilterns AONB due to the intervening vegetation and topography. However; long distance views to elevated locations within the AONB are possible such as Ivinghoe Beacon. There is a glimpsed long distance view of Ivinghoe Beacon landmark.	Moderate
	Taken together these elements result in a moderate susceptibility.	
	Overall susceptibility to change	Moderate





- Other land parcels
- Area of Outstanding Natural Beauty
 Listed Buildings:
- ____ I ____ II ▲___ II

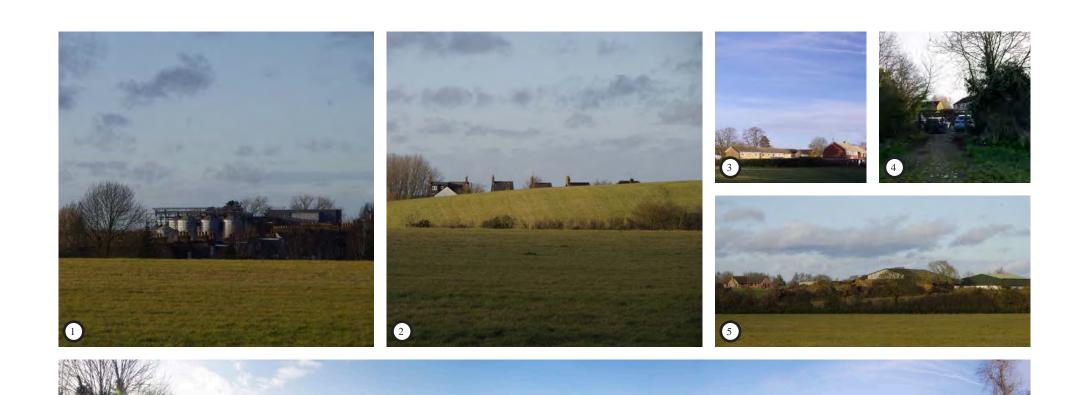
Conservation area

Buildings

Main Road

Public Rights of Way

- 1. Industrial / Agricultural silos on the horizon.
- 2. Rounded mound of the northern field partially screening built development to the north.
- 3. Partially screened residential development.
- 4. Strong vegetated boundary and gate along Grove Road.
- 5. Views of large scale agricultural buildings.
- 6. Panoramic view of the open fields and undulating landform.



Note: Views from viewpoints within the surrounding area, specifically from Ivinghoe Beacon and the Ridgeway National Trail within the Chilterns AONB; were considered, but due to survey restrictions and the Covid-19 pandemic, photos were not obtained.

Evaluation of landscape susceptibility:

The parcel is assessed as having an overall rating of *Moderate* landscape susceptibility to change arising from residential and mixed-use development.

This is primarily a result of the varied topography within the parcel and the perception of tranquillity.

Overall landscape sensitivity:

Taking account of the assessment of landscape value and susceptibility, the parcel is assessed as having a *Moderate* overall sensitivity to change arising from residential and mixed-use development. This is due to the landscape's proximity to the surrounding developments.

In the Landscape Appraisal, part of the Stage 2 Greenbelt Assessment this parcel formed part of Tring TR-A2 which found *medium* sensitivity which is consistent with the findings of this report.

Landscape guidance and principles for development:

Any development in this location should take careful account of and mitigate the following sensitivities:

- views of and from the Chilterns AONB and from locations such as Ivinghoe Beacon within the AONB:
- screening of urbanising features within views such as the silos north of the parcel;
- the established vegetated buffers surrounding the parcel; and
- the existing development pattern along Grove Road and Netherby Close.

The potential design response for any residential and mixed use development should:

- consider elevated views from within the Chilterns AONB; such as from the Ivinghoe Beacon and from the Ridgeway National Trail, toward the parcel. This can be achieved by avoiding intervisible locations or by bolstering hedgerow planting appropriate to the character of the area;
- conserve and enhance the surrounding and internal hedgerows;
- tie into the development of Tring with particular attention to Grove Road and Netherby Close; and
- explore opportunities to mitigate the effects of the urbanising views of surrounding agricultural infrastructure such as silos.

