

# **Proof of Evidence: Green Belt Openness and Landscape Character Matters**

## **Volume 1**

**Demolition of existing golf club buildings and construction of a single and two-storey building for a banqueting facility; widening of existing vehicular access from Brockley Hill, car and cycle parking, waste/recycling storage, landscape enhancement and associated works**

**Former Stanmore and Edgware Golf Centre, Brockley Hill, Stanmore, HA7 4LR**

**Appeal Reference: 3299650**

**Planning Application Reference: P/3088/20**

On behalf of:

Sairam (Holdings) Ltd

Prepared by:

**Robert Hughes BSc (Hons) PgDipLA CMLI**

## Contents

1	INTRODUCTION, BACKGROUND AND SCOPE OF EVIDENCE.....	1
	WITNESS AND QUALIFICATIONS.....	1
	<i>PROFESSIONAL PRACTICE</i> .....	1
	STATEMENT OF TRUTH .....	2
	INSTRUCTION .....	2
	REASONS FOR REFUSAL .....	3
	<i>REASON 1</i> .....	3
	<i>REASON 2</i> .....	3
	SCOPE OF EVIDENCE.....	4
	<i>MAIN ISSUES</i> .....	4
	<i>SUPPORTING INFORMATION</i> .....	4
	<i>APPENDICES AND FIGURES</i> .....	5
2	THE APPEAL SITE AND SURROUNDINGS.....	6
3	PROPOSED DEVELOPMENT.....	9
	SITING AND LAYOUT.....	10
	MASSING AND SCALE .....	11
	<i>VOLUME</i> .....	11
	<i>HEIGHT</i> .....	11
	APPEARANCE .....	11
	LANDSCAPE PROPOSALS .....	13
4	POLICY AND GUIDANCE.....	16
	OPENNESS OF THE GREEN BELT.....	16
	<i>NATIONAL PLANNING POLICY FRAMEWORK</i> .....	16
	<i>PLANNING PRACTICE GUIDANCE</i> .....	16
	<i>OPENNESS OF THE GREEN BELT - CASE LAW</i> .....	17
	<i>THE LONDON PLAN, MARCH 2021</i> .....	18
	<i>HARROW CORE STRATEGY, FEBRUARY 2012</i> .....	19
	<i>HARROW COUNCIL DEVELOPMENT MANAGEMENT POLICIES, JULY 2013</i> .....	19
	CHARACTER AND APPEARANCE OF THE AREA .....	20
	<i>NATIONAL PLANNING POLICY FRAMEWORK</i> .....	20
	<i>HARROW CORE STRATEGY</i> .....	21

---

	<i>HARROW COUNCIL DEVELOPMENT MANAGEMENT POLICIES, JULY 2013</i> .....	22
5	<b>EFFECTS ON THE OPENESS OF THE GREEN BELT</b> .....	24
	CONTRIBUTION TO THE PURPOSES OF THE GREEN BELT.....	24
	BENEFICIAL USE OF THE GREEN BELT.....	25
	EFFECTS ON THE OPENNESS OF THE GREEN BELT .....	25
	SPATIAL IMPACTS OF THE PROPOSED DEVELOPMENT ON THE OPENNESS OF THE GREEN BELT .....	26
	VISUAL IMPACT OF THE PROPOSED DEVELOPMENT ON THE OPENNESS OF THE GREEN BELT .....	27
	<i>SCOPE OF ASSESSMENT</i> .....	27
	<i>PUBLIC VIEWS FROM BROCKLEY HILL</i> .....	29
	<i>PRIVATE VIEWS FROM WITHIN THE FORMER GOLF COURSE</i> .....	31
	<i>PRIVATE VIEWS FROM WITHIN THE APPEAL SITE</i> .....	35
	IMPACTS OF ACTIVITY GENERATED BY THE PROPOSALS ON GREEN BELT OPENNESS .....	37
	CONCLUSION .....	38
6	<b>EFFECTS ON THE CHARACTER AND APPEARANCE OF THE AREA</b> .....	39
	SCOPE OF EVIDENCE.....	39
	APPELLANT’S LANDSCAPE AND VISUAL APPRAISAL.....	40
	OFFICER’S REPORT AND CONSULTATION RESPONSES.....	41
	SITE SPECIFIC CHARACTER .....	42
	PUBLISHED LANDSCAPE CHARACTER ASSESSMENTS .....	44
	<i>LONDON’S NATURAL SIGNATURES: THE LONDON LANDSCAPE FRAMEWORK, 2011</i> .....	44
	HARROW WEALD RIDGE AREA OF SPECIAL CHARACTER .....	45
	<i>CHARACTER ASSESSMENT OF HARROW’S RESIDENTIAL AREAS</i> .....	45
	<i>HARROW WEALD CONSERVATION AREAS SUPPLEMENTARY PLANNING DOCUMENT</i> .....	46
	<i>HARROW KEY VIEWS ASSESSMENT</i> .....	46
	LANDSCAPE SENSITIVITY.....	47
	<i>LANDSCAPE SUSCEPTIBILITY</i> .....	47
	<i>LANDSCAPE VALUE</i> .....	47
	<i>CONTRIBUTION OF THE APPEAL SITE TO THE CHARACTER AND STRATEGIC VALUE OF THE AREA OF SPECIAL CHARACTER</i> .....	48
	SUMMARY OF EFFECTS .....	49
7	<b>SUMMARY AND CONCLUSIONS</b> .....	53
	MAIN ISSUES AND SCOPE OF EVIDENCE .....	53
	SITE CONTEXT .....	54

---

PROPOSED DEVELOPMENT .....	55
<i>LANDSCAPE STRATEGY</i> .....	55
CONTRIBUTION TO THE PURPOSES OF THE GREEN BELT.....	56
EFFECTS ON THE OPENNESS OF THE GREEN BELT .....	56
<i>SPATIAL IMPACTS ON OPENNESS OF THE GREEN BELT</i> .....	56
<i>VISUAL IMPACTS ON OPENNESS OF THE GREEN BELT</i> .....	57
<i>IMPACTS OF ACTIVITY GENERATED BY THE PROPOSALS ON OPENNESS OF THE GREEN BELT</i> .....	58
EFFECTS ON THE CHARACTER AND APPEARANCE OF THE AREA .....	58

## List of Figures

Figure 1: Site Context (prior to fire).....	7
Figure 2: Fire Damage and Graffiti to Clubhouse Building .....	7
Figure 3: Existing and Proposed Site Plan Overlay .....	10
Figure 4: Proposed Elevations .....	12
Figure 5: Landscape Strategy.....	13
Figure 6: Illustrative Section through the site.....	14
Figure 7: Extract of AVR from Brockley Hill at the site entrance .....	30
Figure 8: Extract of Wireframe Photomontage 1.....	30
Figure 9: Extract of Wireframe Photomontage 4 Wireframe 4 .....	32
Figure 10: Extract of Photomontage Wireframe 3 .....	33
Figure 11: From car park entrance looking south.....	35
Figure 12: From car park looking north.....	36
Figure 13: Barnet Plateau Natural Landscape Area.....	44

## Volume 2: Appendices and Figures

### Appendices

- Appendix 1: Landscape Strategy
- Appendix 2: Photomontage for Photoviewpoint 1 (Tyler Grange drawing no. 13210/P15c)
- Appendix 3: Wireframe Photomontages
- Appendix 4: Photomontage Methodology

### Figures

- Figure 1: Site Context and Viewpoint Locations
  - Figure 2: Photoviewpoints 1-4
  - Figure 3: Harrow Weald Ridge Area of Special Landscape Character
  - Figure 4: Policy Context
-

## 1 INTRODUCTION, BACKGROUND AND SCOPE OF EVIDENCE

### WITNESS AND QUALIFICATIONS

- 1.1 My name is Robert Hughes, I am a Director at Incola Landscape Planning and specialise in landscape and visual planning issues associated with development and change. I hold a BSc (Hons) degree in Rural Resources Management from the University of Wales Aberystwyth and a Post Graduate diploma in Landscape Architecture from the University of Central England. I am a Chartered Member of the Landscape Institute (LI).

### PROFESSIONAL PRACTICE

- 1.2 I have over 19 years of professional experience, having started my career in 2003 as a landscape consultant at CPM Environmental Planning and Design Ltd, progressing to the position of Senior Landscape Consultant by 2007. Between 2007 – 2008 I worked as a Senior Landscape Architect for The Landscape Agency, before working as a sole practitioner up until 2011 when I joined Tyler Grange LLP as an Associate. I became a Landscape Partner at Tyler Grange in August 2014 and Technical Director of Tyler Grange Group Limited in September 2019. In February 2021 I set-up and became a Director of Incola Landscape Planning.
- 1.3 I have been appointed by land promoters, developers, local objection groups and public authorities to provide professional landscape and visual planning advice on a wide variety of projects throughout the United Kingdom. These have included residential and mixed use development, ranging from individual dwellings to housing allocations, strategic urban extensions and Garden Villages. I have also worked on projects for commercial, employment and leisure development and undertaken townscape and tall building assessments, and LVIA assessments within Registered Parks and Gardens, as well as windfarm and photovoltaic proposals.
- 1.4 I have extensive experience of working on projects within the Green Belt, including undertaking Green Belt Reviews, promoting land for release from Green Belt within development plans and providing expert witness services in relation to planning appeals for the redevelopment of previously developed land in the Metropolitan Green Belt.
- 1.5 The majority of my career has been involved in the assessment of landscape and visual effects of residential development on greenfield land and associated landscape design inputs. Over the past ten years I have given evidence at Planning Inquiries, Appeal Hearings and Examinations in Public.

## STATEMENT OF TRUTH

- 1.6 The evidence I have prepared represents my professional opinion in response to the Council's reasons for refusal and main issues relating to the openness of the Green Belt and character and appearance of the area, having regard to my own assessment of the landscape and visual context within which the appeal site is situated and the effects of the appeal proposal on the landscape character and visual effects, and the openness of the Green Belt. Based on my knowledge, I believe the facts stated in this evidence are true and accurate.

## INSTRUCTION

- 1.7 I was appointed in May 2022 to prepare evidence and appear as an expert witness on behalf of Sairam (Holdings) Ltd in respect of the refusal of planning application reference P/3088/20 by Harrow Council (the Council).
- 1.8 The description of the proposed development (the appeal proposals) is:
- Demolition of existing golf club buildings and construction of a single and two-storey building for a banqueting facility; widening of existing vehicular access from Brockley Hill, a car and cycle parking, waste/recycling storage, landscape enhancement and associated works*
- 1.9 The planning application was accompanied by a Supplementary Openness and Landscape Appraisal prepared by Cornus Landscape Planning and Design [CD 77]. The appraisal includes an updated Landscape and Visual Appraisal (LVA) at Appendix 1 [CD 78] that was prepared to reflect the site conditions in September 2021 after the fire damaged the golf club building.
- 1.10 I assisted in the preparation of both the Supplementary Openness and Landscape Appraisal and LVA, including formulating the approach to assessing impacts upon the openness of the Green Belt. I also reviewed and provided inputs to the final reports.
- 1.11 The Supplementary Openness and Landscape Appraisal and LVA comprise the most up-to-date consideration of the appeal site and its capacity to absorb change. The Council have raised no technical concerns with the approach or findings of the LVA or the Openness and Landscape Appraisal at either application stage, within the November 2021 Officer's Report [CD 79] or within their Statement of Case (SoC) [CD 84].
- 1.12 The Council's Landscape Officer raised no objection<sup>1</sup> within the November 2021 Officer's Report to the findings of the updated reports with reference to the fire damaged building.

---

<sup>1</sup> November 2021 Officer's Report: Internal Consultee Comments, - LBH Landscape Officer, page 17

## REASONS FOR REFUSAL

1.13 Of the three reasons for refusal, Reasons 1 and 2 are of relevance to matters relating to the openness of the Green Belt and character and appearance of the area. These reasons are summarised below.

### REASON 1

1.14 The first reason states that:

*"The proposed development would have a greater impact on the openness of the Green Belt than the existing development on the application site. The proposed development would therefore constitute inappropriate development in the Green Belt, to the detriment of the character, appearance and openness of the Green Belt."*

1.15 Reason 1 states that the proposed development would therefore be contrary to:

- The National Planning Policy Framework (2021) [CD 1];
- Policy G2 of the London Plan (2021) [CD 2];
- Core policy CS 1 F of the Harrow Core Strategy (2012) [CD 3]; and
- Policy DM 16 of the Harrow Development Management Policies Local Plan (2013) [CD4].

1.16 Reason 1 also considers that no very special circumstances have been demonstrated by the applicant whereby the harm by reason of its inappropriateness is outweighed by other considerations.

### REASON 2

1.17 Reason 2 states that:

*"The proposed building, by reason of its design and form, would appear as unsympathetic and obtrusive in an open setting, to the detriment of the character and appearance of the locality within the context of a Green Belt site."*

1.18 The Council consider the proposals to therefore be contrary to:

- Policy G2 London Plan (2021);
- Policy CS1, B of the Harrow Core Strategy (2012); and
- Policy DM1 of the Development Management Policies Local Plan (2013).

1.19 I note that within the Council's Statement of Case, reference is also made to the following policies, specifically in relation to the Harrow Weald Ridge Area of Special Character:

- Core Strategy Policy CS7A: Stanmore & Harrow Weald; and

- Development Management Policies Local Plan Policy DM6: Areas of Special Character.
- 1.20 The Council have also clarified within their SoC that London Plan Policy D1 is not relevant to this case, having originally been included in Reason for Refusal 2<sup>2</sup>.
- 1.21 I consider those policies and guidance that are of relevance to the reasons for refusal and main issues, as well as supporting evidence and relevant case law within Section 4 of this Proof of Evidence.

## SCOPE OF EVIDENCE

### MAIN ISSUES

- 1.22 As confirmed by the Inspector at the Case Management Conference (CMC) held on 22<sup>nd</sup> August 2022, the main issues for the appeal include the following that relate to Reasons for Refusal 1 and 2:
- The effect of the development upon the openness of the Green Belt; and
  - The effect of the development on the character and appearance of the area.
- 1.23 Both the appellant and the Council are in agreement that the proposal constitutes inappropriate development in the Green Belt.
- 1.24 My evidence will deal specifically with matters relating to the spatial and visual openness of the Green Belt, and the effects of the proposed development upon the landscape character of the area.
- 1.25 Issues relating to the character, quality and design of the proposed development are considered in evidence prepared by Mr Adam Thornton of 5plus Architects.
- 1.26 Planning Matters, including consideration of Very Special Circumstances and the overall planning balance are considered in evidence prepared by Mr Richard Henley of hgh Consulting.
- 1.27 Where relevant to matters relevant to Green Belt and character and appearance, I shall cross- refer to evidence prepared by Mr Thornton within my evidence.

### SUPPORTING INFORMATION

- 1.28 As set out above, the application was accompanied by the following documents that I shall refer to within my evidence:
- Supplementary Openness and Landscape Appraisal, September 2021 [CD 77]; and
  - Landscape and Visual Appraisal, September 2021 (Appendix 1 to the above) [CD 78]

---

<sup>2</sup> Council's Statement of Case, paragraph 5.17, pages 16 and 17.



1.29 I shall also make reference to other documentation prepared to support the planning application, including the following prepared by Tyler Grange Group Limited and 5plus architects:

- Landscape Strategy Plan, January 2021 [CD 40];
- Photomontage for Photoviewpoint 1, January 2021 [CD 62];
- Design and Access Statement, 26 August 2020 [CD 48-51]; and
- Supplementary Design and Access Statement, 28 January 2021 [CD 57]

### *Verified Wireline Photomontages*

1.30 My evidence is also supported by a set of verified wireline photomontages of the proposed building, included at **Appendix 3** at Volume 2 of my evidence. The wirelines have been produced to demonstrate how the proposals will sit in relation to the existing structures and development on the appeal site as viewed from publicly available views at the site entrance off Brockley Hill, as well as private vantages within the former golf course to the north and south of the site. The methodology used to prepare the photomontages is included at **Appendix 4**. The photomontages were prepared by Troopers Hill Limited.

### *APPENDICES AND FIGURES*

1.31 I refer to a set of Appendices and Figures. These are included in a separate document as Volume 2.

#### *Appendices*

- Appendix 1: Landscape Strategy
- Appendix 2: Photomontage for Photoviewpoint 1
- Appendix 3: Wireframe Photomontages
- Appendix 4: Photomontage Methodology

#### *Figures*

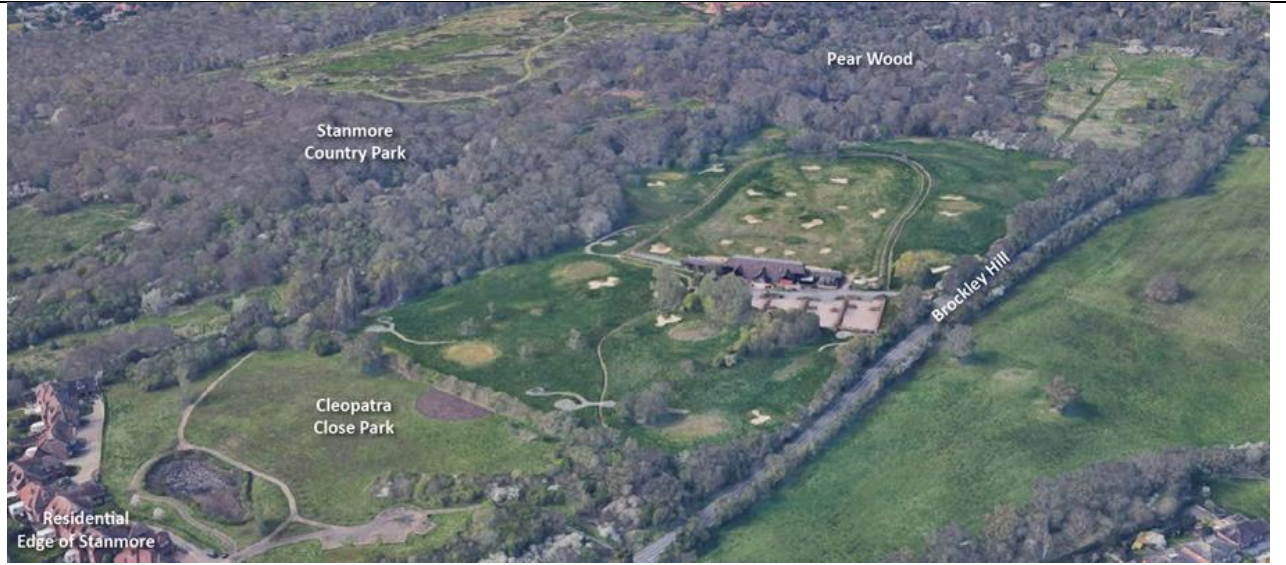
- Figure 1: Site Context and Viewpoint Locations
- Figure 2: Photoviewpoints 1 - 4
- Figure 3: Harrow Weald Ridge Area of Special Landscape Character
- Figure 4: Policy Context

## 2 THE APPEAL SITE AND SURROUNDINGS

- 2.1 The appeal site covers an area of 1.63 hectares and lies to the west of and adjacent to Brockley Hill (the A5) upon the site of a former 9-hole golf course and driving range. The site contains the remains of the former golf centre clubhouse building that was damaged by a fire in June 2020, as well as a storage building, car park and other areas of hard standing associated with the former golf centre. The site lies on the lower slopes of Brockley Hill at a height of 95 – 100m AOD.
- 2.2 The driving range extends to the north of the appeal site on land which rises to a height of 115m AOD on the edge of Pear Wood. The former golf course wraps around the driving range, which is defined by bunding, ditches, netting and associated supports.
- 2.3 The appeal site and wider site comprising the golf course and driving range are contained by woodland at Stanmore Country Park to the west, Pear Wood to the north and mature belts of trees along Brockley Hill to the east.
- 2.4 To the south, mature hedgerows and trees bound the golf course adjacent to Cleopatra Close Park. The park lies to the north of properties on Cleopatra Close and Augustus Close that are situated approximately 285m south of the clubhouse, and 125m south of the wider site area of the golf course.
- 2.5 Mature trees to the south of the car park and clubhouse and hedgerows bounding the car park separate the appeal site from the golf course to the south.
- 2.6 The situation of the site and context described above is illustrated on **Figure 1: Site Context and Viewpoint Locations** at Volume 2 of my evidence. The aerial image below extracted from the LVA<sup>3</sup> shows the context of the appeal site prior to the fire, including clubhouse, car park, driving range and golf course and surrounding woodland, the A5 (Brockley Hill) and Cleopatra Close Park.
- 2.7 There is no public access to the appeal site or grounds of the driving range and former golf course.
- 2.8 There are permissive paths that connect Cleopatra Close Park and Stanmore Country Park, passing through the woodland to the southwest of the golf course. These paths do not allow access onto or across the golf course or driving range. However, as experienced during my site visits, local people appear to be trespassing on the golf course, accessing the land from these paths and using the golf course as a cut through between Stanmore Country Park and Cleopatra Close Park to the south and Pear Tree Wood and the Nature Reserve to the north.

---

<sup>3</sup> Landscape and Visual Appraisal, Site Context (prior to fire), page 8



*Figure 1: Site Context (prior to fire)*

- 2.9 The fire in 2020 damaged the clubhouse building, with the original steel structure remaining along with part of walls, cladding and fencing to the ground floor and some blockwork of the external walls of the first floor. All areas of hardstanding remain.
- 2.10 As illustrated by the photograph below taken from the Supplementary Openness and Landscape Appraisal<sup>4</sup>, there has been vandalism, including graffiti to the building. There is also extensive fly tipping and piles of materials from the fire within the car park and land within the former golf course.



*Figure 2: Fire Damage and Graffiti to Clubhouse Building*

<sup>4</sup> Supplementary Openness and Landscape Appraisal, Image H, page 12

- 2.11 A description of the appeal site and its surroundings, as well as the planning history of the site is included within the Statement of Common Ground (SoCG). The SoCG also contains sets of photographs of the appeal site, both prior to the fire of June 2020 that damaged the clubhouse building<sup>5</sup>, and in May 2022 that represents the current site conditions after the fire<sup>6</sup>.
- 2.12 There is also a more detailed assessment of the site, including features and its context within the local landscape contained within the LVA and within the Supplementary Openness and Landscape Appraisal. These documents also include illustrative photographs since the damage caused by the fire of June 2020.
- 2.13 The site is situated within the Metropolitan Green Belt. The site comprises Previously Developed Land (PDL) within the Green Belt.
- 2.14 As I consider further within my evidence, the appeal site is situated within the Harrow Weald Ridge Area of Special Character, a local, non-statutory designation within the Harrow development plan. The Area of Special Character covers a wider area to the north of the Borough of Harrow and is designated in recognition of the backdrop that the ridge provides to the built area of the town and wider City of London, as well as key views to and from the higher ground. The appeal site is not visible in any Key Views identified for the Area of Special Character or within supporting evidence documents, including the Harrow Key Views Assessment.

---

<sup>5</sup> Statement of Common Ground, Appendix 1

<sup>6</sup> Statement of Common Ground – Appendix 2

### 3 PROPOSED DEVELOPMENT

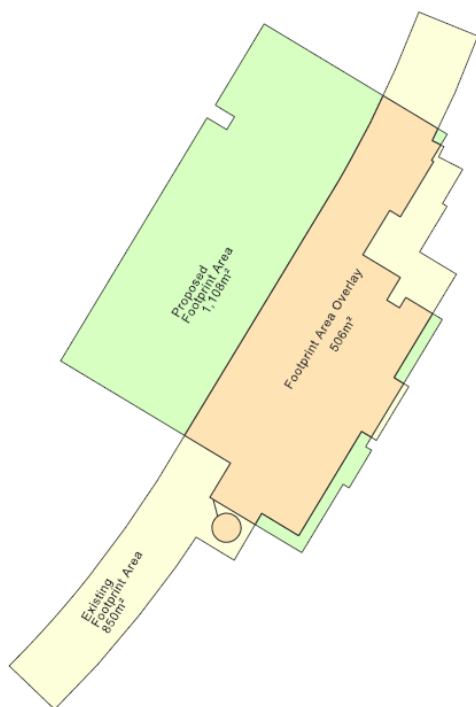
- 3.1 The proposals have been through a collaborative and iterative process with the Council, including pre-application meetings, Design Review Panel and presentation to the Greater London Authority (GLA). Details of the pre-application meetings and iterative design process engaged in by the appellant and project team are set out within the Statement of Common Ground (SoCG).
- 3.2 As summarised at Section 5 of the Supplementary Openness and Landscape Appraisal, the proposals include for the following:
- Replacement of golf clubhouse and replacement with Banqueting Hall facilities;
  - Vehicular and pedestrian access off Brockley Hill;
  - Proposed building located on the footprint of the clubhouse building and centred in a more compact footprint;
  - Proposed building of a lower height than the original building;
  - Retention of existing car park;
  - A Sustainable Drainage System (SuDS);
  - Mounding and native tree planting to site boundaries to provide a landscaped edge; and
  - Internal landscaping and integration with existing landscape features.
- 3.3 I set out further details relating to the Landscape Strategy separately below.
- 3.4 Full details of the proposals are set out in the DAS and evidence prepared by Mr Thornton. I summarise those relating to the siting and layout (footprint) , massing and scale (height and volume) and appearance of the proposed redevelopment below. These factors are of relevance to the impacts of the appeal proposals upon the openness of the Green Belt.
- 3.5 The building footprint comparison is shown on the extract from the 2020 DAS<sup>7</sup> overleaf.
- 3.6 It is noted that the comparative measurements included in the DAS reflect the former clubhouse and driving range buildings prior to the fire damage. The fire has not reduced the footprint of the clubhouse and associated driving range 'wings', which is still defined by the external frames and surviving sections of wall. Similarly, the areas of hardstanding, including the car park and tarmac areas remain.

---

<sup>7</sup> Design and Access Statement, 26 August 2020 Section 4.17 Design Development and Consultation – Building Footprint Comparison of Final Scheme, page 40

## SITING AND LAYOUT

- 3.7 The siting and layout of the proposed building has been designed to minimise the impacts on the surrounding area. The location of the proposed building reflects that of the existing building, located on previously developed land. The fire has not reduced the extent of hardstanding.
- 3.8 The proposed building would have a more compact form than the existing remains of the post-fire building, which still has the frame of the pre-existing projecting wings in place.
- 3.9 This also enables the development to sit within the existing landscape structure and framework provided by trees alongside the southern edge of the appeal site, surrounding the car park and at the site entrance alongside Brockley Hill. The containment by, and setting in relation to the existing trees will screen and soften views of the proposed building, reducing the visual impacts and those upon the openness of the surrounding land within the former golf course outside the appeal site.
- 3.10 The Council accept that the proposed development would be sited on previously developed land. The proposals would therefore not result in any encroachment on the countryside.



*Figure 3: Existing and Proposed Site Plan Overlay*

## MASSING AND SCALE

### VOLUME

- 3.11 Although the fire resulted in the loss of the cladding to the clubhouse and the majority of internal and external walls, the volume of the existing buildings on the appeal site is still apparent in the structural form provided by the remaining sections of walls and steel frame. The ridgeline of the clubhouse remains intact, as well as the cross members and uprights of the main roof and the wings / bays of the former driving range.
- 3.12 Whilst the former building now in part comprises a visually permeable structure on the upper floors and roof, the dimensions of the clubhouse building, its footprint, height and scale is apparent within the appeal site and its setting within the former golf course.
- 3.13 The proposals consolidate the built form into a more compact area within the site, replacing the expansive wings of the former driving range, reducing the width of the building.

### HEIGHT

- 3.14 As highlighted above, the proposals have been specifically designed to minimise impacts upon the openness of the Green Belt and character of the area, including ensuring that the buildings are lower than the clubhouse building to preserve the wooded skylines and minimise visual impacts.
- 3.15 The above factors relating to the massing and scale of the proposed redevelopment are acknowledged at para 6.3.5 of the June 2021 Officer's Report [CD 71], where it is concluded that the overall massing and scale of the proposed building is acceptable:

*"The proposed massing and scale of the building has been based on an assessment of the pre-existing building on site before it was destroyed by fire. Setting aside the issue of Green Belt openness, it is considered that the overall compact design and barn typology is considered to be acceptable. The height and overall scale of the building which is focussed on a previously developed part of the site is considered to be comfortable and appropriate."*

### APPEARANCE

- 3.16 As examined within the Supplementary Openness and Landscape Appraisal, the appearance of the existing buildings and structures on the appeal site is influenced by the colourful and vibrant graffiti that adorns much of the retained clubhouse. This draws the eye and detracts from the character of the appeal site and local landscape, as well as the visual amenity of the area. This includes publicly available views at the site entrance on Brockley Hill where the barriers and graffiti adversely affect the visual amenity for users of the road and pavement.

- 3.17 As detailed within the DAS and Supplementary DAS, the appearance of the proposed development has also been designed to respect the local vernacular of pitched roof buildings, and to harmonise with the agricultural precedents of the Green Belt in the area, with the use of natural materials to clad the buildings.
- 3.18 The revised material palette, as illustrated in the Supplementary DAS (page 18) utilises natural materials, including living walls, slate cladding and blackened timber.
- 3.19 The appearance of the building and materials used are illustrated on the sections, elevations and visualisations contained within the DAS and Supplementary DAS, as shown on the extract below<sup>8</sup>:
- 3.20 The Council recognise that the appellant has responded to the Design Review Panel (DRP) with the refinement of the materials palette, stating at para 6.3.8 of the June 2021 Officer's Report:

*"Natural materials have been selected to help the building blend into its semi-rural green belt setting. The proposed green wall, timber cladding and grey slate are in keeping with the site's Green Belt setting."*

Proposed South Elevation



Proposed East Elevation



**Figure 4: Proposed Elevations**

<sup>8</sup> Supplementary Design and Access Statement, 28 January 2021 Section 3.13 Response to Statutory Consultees – Proposed elevations, page 20



LANDSCAPE PROPOSALS

- 3.21 The landscape proposals were developed as part of the iterative design process for the redevelopment of the clubhouse and included consultation with the design team at the Council. They form an integral part of the overall appeal scheme, ensuring that the proposals provide a contextual fit, minimising visual impacts, respecting the landscape character and retaining the openness of the Green Belt.
- 3.22 The landscape proposals are illustrated on the Landscape Strategy Plan [CD 40] that was prepared by Tyler Grange in January 2021. A copy of the Landscape Strategy is included at **Appendix 1** of my evidence (Volume 2) also included within the LVA at Figure 5 (page 29). An extract is included below:



Figure 5: Landscape Strategy

- 3.23 The Landscape Officer confirmed in the June 2021 Officer’s Report that the proposals are acceptable in terms of trees, landscaping and biodiversity, subject to planning conditions.

3.24 As summarised in the LVA (para 5.8), the landscape proposals include the following measures:

- Retained boundary vegetation to Brockley Hill at eastern edge of the site;
- Retained vegetation within the car park, with trees and hedgerow integrated into the proposals;
- New hedgerow planting alongside access road;
- Additional tree planting to increase characteristic features and Green Infrastructure, with additional internal landscape features integrating the building into its setting;
- Redevelopment located behind existing trees and areas of new native tree planting to southern site boundary, centralising and consolidating built form;
- Landscaped mound to the northern part of the site planted with native trees to integrate building into the surrounding landscape, reflecting the wooded backdrop and softening proposed built form;
- New planting to site boundaries and landscaped edge provide separation and maintain the undeveloped land of the adjacent former golf course, including the higher ground on the sloping land to the north; and
- Former clubhouse building replaced with new banqueting facility improving the character, appearance and condition of the site, using high quality materials.

3.25 The section below<sup>9</sup> illustrates the reprofiling and mound to the north of the appeal site that is proposed to be planted with native trees.



*Figure 6: Illustrative Section through the site*

<sup>9</sup> Extracted from DAS, page 49

- 3.26 The landscape strategy also includes for smaller intimate areas around the proposed venue, including a secret garden. These areas will incorporate native planting, including areas of wildflower meadow as well as SuDS and an attenuation pond with marginal planting for biodiversity.
- 3.27 There is also scope for the existing netting and lighting associated with the former golf course use beyond the appeal site boundary to be removed.
- 3.28 The mixture of native structural planting proposed to the site boundaries tying-in with and reinforcing existing trees and hedgerows will assimilate the proposals into the landscape whilst ensuring the surrounding open aspect of the former golf course is retained.
- 3.29 The more formal, managed areas within the appeal site reflect the former character of the clubhouse, car park and driving range and use of the adjacent land as a golf course, an amenity landscape set-out with fairways, bunkers and greens. The proposed landscaped mound to the northern edge of the appeal site reflects the land modelling across the former golf course associated with the driving range, fairways, greens and bunkers.

## 4 POLICY AND GUIDANCE

- 4.1 I summarise below the policies and guidance that are of relevance to the appeal in relation to openness to the Green Belt (reason for Refusal 1) and Character & Appearance (Reason for Refusal 2). This includes those that have been identified within the Reasons for Refusal and Council's Statement of Case. I set-out the relevant policy for each of the main issues separately.
- 4.2 I also summarise Judgements and Decisions that are of relevance to consideration of the openness of the Green Belt and visual impacts of development proposals.

### OPENNESS OF THE GREEN BELT

#### NATIONAL PLANNING POLICY FRAMEWORK

- 4.3 The Appellant accepts that the proposal is inappropriate development in the Green Belt, as it is not one of the exceptions as set out at paragraph 149 of the NPPF.
- 4.4 Matters relating to the Very Special Circumstances and Planning Balance are dealt with in evidence prepared by Mr Henley.
- 4.5 Whilst the appeal proposals for the redevelopment of the site would be larger in some spatial terms, as I demonstrate within my evidence there would be no greater harm to the visual openness of the Green Belt arising from the proposals.
- 4.6 Further clarity on what constitutes openness in Green Belt terms, including spatial and visual aspects and those factors that should be taken into account in decision making is provided within the Planning Practice Guidance (PPG) .

#### PLANNING PRACTICE GUIDANCE

*What factors can be taken into account when considering the potential impact of development on the openness of the Green Belt?*

- 4.7 The PPG clarifies that assessing the impact of a proposal upon the openness of the Green Belt requires a judgement based on the circumstances of the case and identifies a number of matters identified by the courts which may need to be taken into account when making this assessment<sup>10</sup>. These include, but are not limited to:

*"openness is capable of having both spatial and visual aspects – in other words the visual impact of the proposals may be relevant, as could its volume;*

---

<sup>10</sup> PPG Paragraph: 001 Reference ID: 64-001-20190722 (Revision Date 22 07 2019)

*the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*

*the degree of activity likely to be generated, such as traffic generation”*

## **OPENNESS OF THE GREEN BELT - CASE LAW**

*Turner v Secretary of State for Communities and Local Government [2016] EWCA Civ 446*

- 4.8 The PPG takes into account the findings of the 2016 Turner case which confirmed that openness is “open textured” and capable of having both spatial and visual aspects.
- 4.9 As set out at paragraph 14 of the ruling, Lord Justice Floyd considers that:

*The concept of “openness of the Green Belt” is not narrowly limited to the volumetric approach suggested by Mr Rudd. The word “openness” is open-textured and a number of factors are capable of being relevant when it comes to applying it to the particular facts of a specific case. Prominent among these will be factors relevant to how built up the Green Belt is now and how built up it would be if redevelopment occurs (in the context of which, volumetric matters may be a material concern, but are by no means the only one) and factors relevant to the visual impact on the aspect of openness which the Green Belt presents.*

- 4.10 Since the latest revision of the PPG in relation to Green Belt openness in July 2019, there have been subsequent judgments made by the courts, including the Samuel Smith Old Brewery and Isabel Haden cases, both from 2020 which I summarise below.
- 4.11 These judgments provide further clarity on the legal requirement to consider visual impacts on openness, as well as the need for a balanced judgement that considers impacts within the overall context of a development.

*R (Samuel Smith Old Brewery) v Yorkshire CC [2020] UKSC 3*

- 4.12 In the Samuel Smith case, additional clarity is provided relating to openness building on the Turner case that acknowledges the concept of openness is not narrowly limited to a volumetric approach, being “open textured”.

- 4.13 In relation to the visual aspects of openness, the judgment identifies that visual impact is not necessarily relevant to all cases. However, the visual effects of proposals may be relevant in some cases when applying the concept of openness<sup>11</sup>.
- 4.14 Importantly, the Samuel Smith case clarifies that Openness is not a matter of legal principle, but a matter for planning judgement<sup>12</sup>.

### *R (Isabel Haden) v Shropshire Council [2020] EWHC 33*

- 4.15 The Haden case relates to an Officer's report that was challenged in relation to consideration of impacts on the openness of the Green Belt as needing to be sufficient to materially undermine the perception of openness, as distinct from identifying specific localised effects.
- 4.16 The Ruling emphasises the importance of<sup>13</sup>:

*".. taking a broader look at the potential impacts of a proposal rather than merely cataloguing and assessing specific impacts that might have a local effect but are not necessarily material when viewed in the overall context of a development."*

- 4.17 The ruling goes on to acknowledge that it is not saying specific localised impacts can never undermine the perception of openness, but that they do not necessarily do so.
- 4.18 Given the findings of the judgment in the Haden case, it is therefore relevant to consider the impact of a development on openness of the Green Belt within its broader context, as well as at a more localised level.

### *THE LONDON PLAN, MARCH 2021*

#### *Policy G2 London's Green Belt*

- 4.19 Reason for Refusal 1 considers that the appeal proposals would be contrary to Policy G2 of the London Plan, by reason of it having a greater impact on the openness of the Green Belt than the existing development.
- 4.20 Policy G2 reflects the NPPF in protecting the Green Belt from inappropriate development, stating that:

*1) "Development proposals that would harm the Green Belt should be refused except where very special circumstances exist."*

---

<sup>11</sup> R (Samuel Smith Old Brewery) v Yorkshire CC [2020] ruling, paragraph 40

<sup>12</sup>R (Samuel Smith Old Brewery) v Yorkshire CC [2020] ruling, Paragraph 38

<sup>13</sup> R(Isabel Haden) v Shropshire Council [2020] ruling, paragraph 54

- 4.21 The policy also goes on to state that the enhancement of the Green Belt to provide multi-functional beneficial uses for Londoners should be supported, subject to national planning policy tests.
- 4.22 The supporting text also emphasises that the Mayor will work with borough and strategic partners to improve the quality of derelict and unsightly areas of the Green Belt in ways that are appropriate within the Green Belt.

## *HARROW CORE STRATEGY, FEBRUARY 2012*

### *Core Policy CS1 F 'Open Space, Sport and Recreation*

- 4.23 Policy CS1, part F focusses on the management of areas of open space and Harrow's green grid as a multifunctional environmental resource contributing to biodiversity, climate change and amenity. As part of this, the policy states that:

*"The quantity and quality of the Green Belt, Metropolitan Open Land and existing open space shall not be eroded by inappropriate uses or insensitive development."*

- 4.24 The supporting text to Policy CS1 states that the network of open spaces is important to the character of the Borough and identifies a need to protect open spaces to maximise their multifunctional use as an amenity and recreation resource , as well as for wildlife.

## *HARROW COUNCIL DEVELOPMENT MANAGEMENT POLICIES, JULY 2013*

### *Policy DM 16: Maintaining the Openness of the Green Belt and Metropolitan Open Land*

- 4.25 Part A of Policy DM16 deals with the redevelopment or infilling of previously developed sites in the Green Belt, stating that this will be supported where the proposals would not have a greater impact on the openness of the Green Belt and the purposes of including land within it than the existing development.
- 4.26 The policy sets out the following factors to which proposals should have regard:
- The height of existing buildings on the site;
  - The proportion of the site that is already developed;
  - The footprint, distribution and character of existing buildings on the site; and
  - The relationship of the proposal with any development on the site that is to be retained.

### *Visual Amenity and Character of the Green Belt and Metropolitan Open Land*

- 4.27 Part B of Policy DM 16 requires proposals for the redevelopment or infilling of previously developed sites to also have regard to the visual amenity and character of the Green Belt.

- 4.28 In addition to the requirements above, Part C of the policy states that proposals for partial infilling or redevelopment of previously developed sites within the Green Belt and Metropolitan Open Land should be put forward in the context of a comprehensive long term plan for the site as a whole.
- 4.29 Finally, Part D states that proposals for inappropriate development or that which would harm the Green Belt will be refused in the absence of clearly demonstrated very special circumstances.

## CHARACTER AND APPEARANCE OF THE AREA

- 4.30 The focus of the second reason for refusal is upon the design of the proposed replacement building as opposed to matters related to the landscape proposals. The Landscape Strategy has been accepted by the Council's officers as appropriate, reflecting the character of the landscape and integrating the proposed building into the landscape.
- 4.31 Aspects relating to the building design and architectural quality are dealt with in evidence prepared by Mr Thornton.
- 4.32 Whilst not included within the reasons for refusal, the Council's Statement of Case identifies conflict with local development plan policies CS7A and DM6 in relation to the situation of the appeal site within the Harrow Weald Ridge Area of Special Character, a local non-statutory designation. I have therefore considered the effects of the appeal proposals upon the landscape character and key characteristics and views associated with the Area of Special Character.

## NATIONAL PLANNING POLICY FRAMEWORK

- 4.33 The Council's Statement of Case (but not the second reason for refusal) cites conflict with NPPF paragraphs 126, 130 (a, b and c) and 134. All of these paragraphs are within Chapter 12 'Achieving well-designed places' which focusses upon the design and quality of development.
- 4.34 In relation to landscape character, paragraph 130 c of the NPPF states that 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."*

- 4.35 As summarised in the November 2021 Officer's Report, the Landscape Officer agreed with the findings of the submitted LVA which identifies the appeal site as not being a "valued landscape". It is therefore common ground that the Site is not a valued landscape under the provisions of paragraph 174 of the NPPF.



4.36 Turning to the statutory development plan, Reason 2 states that:

*"The proposed building, by reason of its design and form, would appear as unsympathetic and obtrusive in an open setting, to the detriment of the character and appearance of the locality within the context of a Green Belt site."*

4.37 The Council consider the proposals to therefore be contrary to:

- Policy G2 London Plan (2021);
- Policy CS1, B of the Harrow Core Strategy (2012); and
- Policy DM1 of the Development Management Policies Local Plan (2013).

4.38 I note that within the Council's Statement of Case, reference is also made to the following policies, specifically in relation to the Harrow Weald Ridge Area of Special Character:

- Core Strategy Policy CS7A: Stanmore & Harrow Weald; and
- Development Management Policies Local Plan Policy DM6: Areas of Special Character.

## **HARROW CORE STRATEGY**

### *Core Policy CS1.B – Local Character*

4.39 Part B of Policy CS1 focuses on built development, including design, siting, density and spacing. The policy requires proposals to reinforce the positive attributes of local distinctiveness whilst promoting innovative design.

### *Core Policy CS7A: Stanmore & Harrow Weald*

4.40 The appeal site is situated within the Stanmore & High weald Policy Sub Area. Although not within the reasons for refusal, the Council have identified conflict with CS7A within their Statement of Case.

4.41 Part A of the policy states that development will be managed to maintain the special character and identified views of Harrow Weald Ridge.

4.42 The supporting text to Policy CS7 states at paragraph 10.4 that:

*"The high ground at Harrow Weald Ridge is of strategic value as an area of special character, providing a countryside backdrop to the suburban areas south of the Green Belt. A number of important public views of the ridge have been identified and these will be retained and safeguarded."*

- 4.43 I note that the Council have not identified any conflict with part C of Policy CS7 that relates to identified views of Harrow Weald Ridge. This reflects the fact that the appeal site does not form part of any such identified views, which are protected under Policy DM 3, as supported by the Harrow Views Assessment, July 2012 [CD 20]

## *HARROW COUNCIL DEVELOPMENT MANAGEMENT POLICIES, JULY 2013*

### *Policy DM1: Design, Layout, Privacy and Amenity*

- 4.44 Under the heading "Design and Layout Considerations", Policy DM1 focusses on matters including massing, scale and height, as well as appearance, materials and colour.
- 4.45 At Part B, point e, the need for proposals to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit is identified as a factor for consideration.
- 4.46 The supporting text to Policy DM1 expands on the above at paragraph 2.10, stating that:

*"Landscaping should be included as an integral part of the overall design of a development proposal. The landscape and buildings need to be considered together from the start of the design process and careful consideration given to the existing character of the site including its typology and existing trees and landscape. The opportunity provided by new development to enhance the presence of trees, landscaping, biodiversity and other natural features in areas where these are lacking will be fully exploited."*

### *Policy DM6: Areas of Special Character*

- 4.47 Policy DM6 states that proposals affecting an Area of Special Character will be considered having regard to:

*A - The impact of the proposal upon the strategic value of the area of special character;*

*B - The desirability of preserving or enhancing the environmental, architectural, historic and landscape features that contribute to the area of special character; and*

*C - The protected views to and from areas of special character.*

- 4.48 The policy states that proposals that would substantially harm an area of special character, or its setting, will be refused.

4.49 The supporting text to policy DM6 states at paragraph 2.37 that:

*"The strategic value of the Harrow Weald Ridge and Pinner Hill area of special character is as a significant landscape backdrop that comprises extensive tree cover, including the cumulative contribution of small groups and individual trees, and major open areas."*

4.50 The text continues at paragraph 2.42:

*"In landscape terms, the skyline of Harrow Weald Ridge and Pinner Hill on the horizon, and the distinctive profile of Harrow on the Hill, are closely related to the strategic value of these areas of special character. However, other features such as ponds, meadows, hedges, ancient field patterns, dykes and ditches may also be important to the special character of these areas."*

4.51 I consider the situation of the appeal site within the Area of Special Character and effects of the proposals upon the strategic value and associated features and characteristics in detail at Section 6 of this proof of evidence.

## 5 EFFECTS ON THE OPENESS OF THE GREEN BELT

### CONTRIBUTION TO THE PURPOSES OF THE GREEN BELT

- 5.1 As set out within the June 2021 Officer's Report,<sup>14</sup> the Council accept that the appeal proposals would not conflict with purposes (a) to (e) of the Green Belt, as defined at NPPF paragraph 138, summarising that:
- The surrounding boundaries of the wider golf course are occupied by mature trees and vegetation;
  - There is no physical connection between the appeal site and area proposed for development and any large built-up area;
  - The building would be positioned on previously developed land (PDL) and so would not result in any encroachment of the countryside; and
  - The proposal would not conflict with NPPF paragraph 138 e, as the sequential site assessment has sufficiently demonstrated that there are no alternative appropriate urban sites.
- 5.2 The Supplementary Openness and Landscape Appraisal assesses the contribution that the appeal site makes to the Green Belt purposes<sup>15</sup>, concluding that the appeal site makes no contribution to purposes 1, 2 and 4 and a limited contribution to purposes 3 (to assist in safeguarding the countryside from encroachment) and purpose 5 (to assist in urban regeneration by encouraging the recycling of derelict and other urban land).
- 5.3 As accepted by the Council, the Appellant has demonstrated through a comprehensive sequential site assessment that there are no alternative appropriate urban sites, and that there is therefore no conflict with paragraph 138 e.
- 5.4 As is also accepted by the Council, the proposed development is contained on PDL. I therefore agree that the proposals would not encroach into the countryside, and therefore do not conflict with NPPF paragraph 138 c.
- 5.5 Given the above, I do not consider the appeal proposals have any conflict with any of the five purposes of the Green Belt.

---

<sup>14</sup> Officer's Report, June 2021, paragraph 6.2.377

<sup>15</sup> Supplementary Openness and Landscape Appraisal, Section 4- Existing Site Context – Contribution to the purposes, paragraphs 4.1 – 4.8, pages 8 and 9

## BENEFICIAL USE OF THE GREEN BELT

- 5.6 The proposals would enhance the undeveloped parts of the appeal site through the retention and management of existing trees and hedgerows and planting of additional native trees to strengthen the landscape structure and character, as well as areas of wildflower meadow and amenity landscape incorporating planting and management of SuDS for biodiversity gain.
- 5.7 As detailed above when considering policy and guidance and set out within the Supplementary Openness and Landscape Appraisal<sup>16</sup>, both national and local policy seeks to enhance the beneficial use of land within the Green Belt, retaining and enhancing landscapes, visual amenity and biodiversity and quality of the environment. As set out at NPPF paragraph 145, this may also include the improvement of damaged and derelict land.
- 5.8 The redevelopment of the appeal site will renew a degraded and derelict site, providing a high quality new building and landscape scheme that will respect the surroundings, improve the character and provide a Biodiversity Net Gain of 20% and 49.95% hedgerow units<sup>17</sup>
- 5.9 This accords with the provision of both the NPPF and Policy G2 of the London Plan.

## EFFECTS ON THE OPENNESS OF THE GREEN BELT

- 5.10 As determined through the Turner case and reflected within the Planning Practice Guidance, openness of the Green Belt is capable of having both spatial and visual aspects.
- 5.11 I note that the visual aspects of openness will not as a matter of law necessarily be relevant to any given case and that it is up to the decision maker to ascertain the relevance and importance of this aspect as it relates to individual, specific proposals.
- 5.12 As recognised by the Haden judgment, I include a review of the effects on openness of the Green Belt within the broader context. This includes consideration of public views from Brockley Hill as well as private vantages from across the former golf course and within the appeal site.
- 5.13 Mr Thornton provides details of the metrics for footprint, floorspace, volume and height within his evidence. This includes consideration as to how these have changed since the fire damage occurred to the existing building. I draw upon these within my consideration of spatial matters.
- 5.14 I summarise Mr Thornton's findings below and give consideration to how the spatial aspects of the proposals relate to the layout, arrangement and height of development. These factors also have a bearing on the visual aspects of the proposals and how they are perceived within the landscape and context of the open, undeveloped Green Belt.

---

<sup>16</sup> Supplementary Openness and Landscape Appraisal: Section 7 Conclusion – Beneficial use of the Green Belt, paragraph 7.19 – 7.21, page 20

<sup>17</sup> Statement of Common ground, paragraph 7.49, page 27

- 5.15 I also refer to the evidence of Mr David Bird of Vectos in relation to activity likely to be generated by the proposals.
- 5.16 My analysis and assessment draw upon the findings of the Supplementary Openness and Landscape Appraisal and the appended LVA, as well as the set of verified wireline photomontages included on **Figure 3** at Volume 2 of my evidence.

## SPATIAL IMPACTS OF THE PROPOSED DEVELOPMENT ON THE OPENNESS OF THE GREEN BELT

- 5.17 As detailed by Mr Thornton in his evidence, the proposed development will result in an increase in the overall footprint of development of 30% as compared to the former clubhouse, with a corresponding 30% increase in volume. The height of the building will reduce by 0.4m.
- 5.18 When summarising how the fire has affected the existing building on the appeal site, Mr Thornton has summarised the following:
- **Footprint:** The footprint of the building is still clearly visible on the site. The proposals are also related to the area of PDL. The location of the PDL is not contested by either party;
  - **Volume:** The spatial volume is unchanged, with the observation of the volume of the building still visible on site, especially when moving through the site;
  - **Height:** The steel frames are still in place, with the maximum height only marginally decreased with the loss of roofing fabric. The proposed development remains below the height of the existing structure.
- 5.19 Importantly, the volume of the building is still clearly apparent on the site and within the surroundings. The remaining brick and block walls at ground and first floor level, along with remaining cladding provide a solidity to the building. Whilst the fire has reduced the upper storey and roof to the steel frame, the structure is still strongly evident, with the volume of the building appreciable whilst moving around within the appeal site and adjacent land within the golf course.
- 5.20 When appreciated in context, and as part of the dynamic experience when moving around the site, the uprights and cross beams of the structure come together and overlap appearing as a more solid form from different angles.
- 5.21 This internalised openness is contained within the retained structure and is experienced only in a partial context and as part of the form and massing of the overall structure.

- 5.22 As I have detailed above in my review of the proposed development, the scheme has been designed to incorporate measures to ensure that the development is contained within the landscape and does not encroach into the open undeveloped Green Belt. Importantly, in addition to limiting the new building on areas of PDL, this has also included the consolidation of development towards the centre of the site, with the removal of the “wings” of the former clubhouse that extend outwards from the main building.
- 5.23 The reduced height of the proposed building has also been designed to ensure that the redevelopment does not encroach onto or break the skyline that is formed by the wooded backdrop to the site boundaries, including the mature trees that bound Stanmore Country Park to the west and on the rising land towards Pear Wood to the north.
- 5.24 The proposals also retain the existing car park and access road in their current location, maintaining the relationship of areas of hardstanding to the built development.
- 5.25 The above factors ensure that any impacts on the spatial openness of the Green Belt are highly localised within an area of PDL, retaining the openness of surrounding land within the driving range and golf course.
- 5.26 The existing trees and hedgerows that bound the site providing containment and separation from the undeveloped, open land within the former golf course are also to be retained.
- 5.27 The mature trees and woodland that bound the golf course limit any indirect impacts beyond the immediate vicinity of the appeal site.
- 5.28 In addition to the above factors, the landscape proposals will also serve to strengthen the containment of the development within areas of PDL. The proposed structural landscape planting including native trees and hedgerows will tie-in with the existing trees that bound the site. This includes trees to the north of the proposed development on the landscaped mound.

## VISUAL IMPACT OF THE PROPOSED DEVELOPMENT ON THE OPENNESS OF THE GREEN BELT

### SCOPE OF ASSESSMENT

- 5.29 As set out within the Planning Practice Guidance<sup>18</sup> openness is capable of having both spatial and visual aspects, stating that it may be relevant to consider the visual impact of development upon the openness of the Green Belt.

---

<sup>18</sup> Paragraph: 001 Reference ID: 64-001-20190722 Revision date 22 07 2019

- 5.30 There are limited visual impacts associated with the proposed development due to the physical containment of the site and adjacent golf course and lack of public access and publicly accessible views and vantages of the site and existing development.
- 5.31 As detailed within the Supplementary Openness and Landscape Appraisal and LVA, the containment of the appeal site and former golf course by mature trees and woodland screen views from beyond the site, with the exception of those obtained from Brockley Hill by the site entrance.
- 5.32 The appeal proposals would therefore have no visual impact upon the wider Green Belt beyond the appeal site and former golf course. Any impacts on the openness of the Green Belt will be localised in nature.
- 5.33 As set out further in the LVA and as I consider in relation to Character and Appearance, the redevelopment of the site will not impact on any of the key views associated with the Harrow Weald Ridge Area of Special Character, as identified in the supporting evidence base which comprises:
- The Harrow Views Assessment [CD 20] and
  - The Character Assessment of Harrow’s Residential Areas [CD 19]
- 5.34 With the exception of views obtained from the site entrance on Brockley Hill, views from within the appeal site and from the adjacent golf course are private.

*Supplementary Openness and Landscape Appraisal*

- 5.35 When considering the visual effects of the proposals I have made reference to the Supplementary Openness and Landscape Appraisal and LVA as appropriate.
- 5.36 At Section 6 the Supplementary Openness and Character Appraisal undertakes a “Comparison of Visual Openness of the Green Belt”. The appraisal identifies the following views that form the basis of the comparison:
- Public views from Brockley Hill;
  - Private long range views from the north and south outside of the appeal site; and
  - Immediate views within the appeal site
- 5.37 For each of the above sets of views, the appraisal provides a summary of the existing views, after the fire and subsequent deterioration associated with vandalism, graffiti and lack of management, as well as a summary of how the proposals will appear in the views and the changes associated with the appeal scheme.
- 5.38 A comparison of the impacts on openness is then made between the existing views and the changes associated with the appeal proposals.
- Nature of the view of the development – full, partial or glimpsed;



- Proportion of the development or particular features visible;
- Nature of change – i.e. changes in skyline profile, creation of new visual focus, introduction of man-made objects, changes in visual simplicity or complexity, alteration of visual scale and change to degree of visual enclosure.

- 5.39 I consider that in this case, it is also relevant to consider how the proposals will serve to improve the visual character of the appeal site when assessing the visual impacts on the Green Belt. This reflects the poor condition of the appeal site and clubhouse following the fire, with the damaged building, graffiti, fly tipping and lack of management of the site and surrounding golf course detracting from views and drawing the eye.
- 5.40 The Supplementary Openness and Landscape Appraisal takes these factors into consideration, including how the graffiti and degraded nature of the site and surrounding golf course act as detractors and draw attention to development.
- 5.41 My appraisal includes a set of representative views from Brockley Hill, and within the golf course and appeal site. The location of the viewpoints is illustrated on **Figure 1** at Volume 2 of my evidence. The photosheets are set out on **Figure 2**. I also refer to the wireframe photomontages that support the assessment and demonstrate how the proposals have been designed to minimise any visual impacts. The photomontages are contained at **Appendix 3** of my evidence.

## *PUBLIC VIEWS FROM BROCKLEY HILL*

### *Effects on Visual Amenity*

- 5.42 As summarised within the LVA, users of Brockley Hill are of a low sensitivity to the proposed redevelopment. This reflects that the views are glimpsed and fleeting when travelling along the road and of a low susceptibility to changes to views associated with the appeal proposals. The views from Brockley Hill are also assessed by the LVA as being of low value, being of the degrading form of the fire damaged buildings.
- 5.43 The LVA concludes that the proposed development will improve and enhance the existing views and be beneficial to the visual amenity of people travelling along Brockley Hill and with views into the site.
- 5.44 The assessment recognises that the proposals for the replacement of the dilapidated clubhouse building with the new high quality banqueting facility with associated tree planting, hedgerow and green walls as well as the removal of barriers, fencing will result in an overall improvement to the views into and setting of the site on Brockley Hill. I agree with this assessment.

5.45 The AVR<sub>3</sub> rendered photomontage from the site entrance off Brockley Hill [CD 62] and Appendix 2 of my evidence<sup>19</sup> shows the proposals at year 15 with the maturation of the landscape strategy and demonstrates these enhancements. This is illustrated on the extract below:



*Figure 7: Extract of AVR from Brockley Hill at the site entrance*

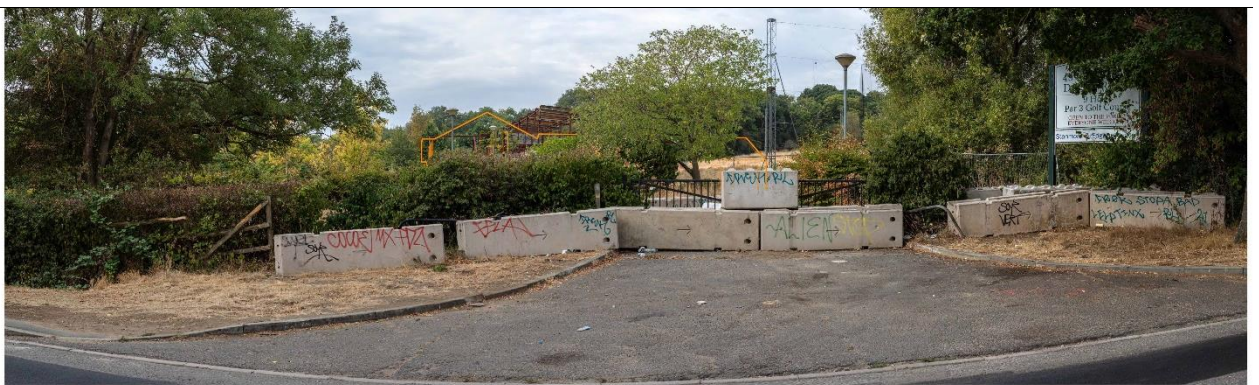
*Impacts on Visual Openness of the Green Belt*

5.46 When considering the views from Brockley Hill, the Supplementary Openness and Landscape Appraisal summarises at paragraph 6.11:

*"The visual openness in public views will not significantly change as a result of the proposed development, although the position and quality of the built form will be enhanced within these views. "*

5.47 The assessment also recognises that the proposals will be of a lower height and more compact design, with the composition of the view being similar to the existing situation.

5.48 The quality of the proposals, incorporating appropriate materials and enhanced landscaping is illustrated in the photomontage extract above.



*Figure 8: Extract of Wireframe Photomontage 1*

<sup>19</sup> And also contained at Appendix 6 of the LVA

- 5.49 **Wireframe Photomontage 1** taken from the same location at the site entrance, further demonstrates how the location of the building and ridge height has been designed to respect the wooded treeline that bounds Stanmore Park to the west of the appeal site and golf course, as well as reflecting the location, massing and scale of the existing development. This is illustrated by the extract above.
- 5.50 Whilst the floor and roof of the fire damaged building does not have the same solidity as previously, the height, volume and massing of the structure is still clearly evident, impacting on the openness of the Green Belt. As the wireframe and AVR3 images demonstrate, the proposed redevelopment would reflect the existing location and height of the clubhouse in the views into the site entrance from Brockley Hill along with additional tree planting to soften the built form.
- 5.51 Considering the above, on balance I conclude that there would be no greater harm arising to the visual openness of the Green Belt associated with the proposed development as experienced from public vantages on Brockley Hill.

#### *PRIVATE VIEWS FROM WITHIN THE FORMER GOLF COURSE*

- 5.52 The Supplementary Openness and Landscape Appraisal considers long range views from the north and south of the appeal site, within the private land of the former golf course. The appraisal contains representative images from the north (Images O and P) but has not included longer-range views from the south.
- 5.53 I have included views from both the north and south within my evidence, with Wireframe Photomontages prepared for these views to assist in assessing the visual impacts of the appeal proposals. The location of these views is illustrated on **Figure 1: Viewpoint Locations at Volume 2** of my evidence. The wireframe montages are contained at **Appendix 3** within Volume 2 of my evidence.

#### *Views from the north*

- 5.54 At paragraph 6.13 the Supplementary Openness and Landscape Appraisal describes the views from the north:

*"Within the adjacent golf course and from the higher private land to the north, the golf course is open and undeveloped in its nature. Within these elevated views, the clubhouse is a prominent feature within the landscape, and although having undergone fire damage, the overall height, structure and form is retained, with the metal framework clearly evident (Image O). In addition to this, the walling which is present on the lower parts of the building has been the subject of graffiti and vandalism, making the structure more visually detracting within these long range views (Images O and P)."*

5.55 The appraisal also quotes from the officer’s committee report with reference to the previous LVA that was prepared by Tyler Grange Limited<sup>20</sup>. Officers recognised that prior to the fire the clubhouse was clearly visible and prominent in views within the former golf course to the north. The quoted officer report goes on to consider that:

*“The open nature of the site and the exposed edge of the pre-existing building shown when viewed from the upper slopes within the site impacts on openness of the Green Belt as well as the presence of fencing and netting seen around the wider golf course.”*

5.56 Of particular relevance to the visual openness of the Green Belt is the open, developed edge of the site with the clubhouse, wings and associated infrastructure fronting the driving range, which continues to be exposed in the elevated views from the north of the former golf course.

5.57 As illustrated on the Landscape Strategy, the appeal proposals include for earth modelling and structural landscape planting to the northern edge of the site that will effectively filter and, over time, screen the proposals, providing a characteristic belt of native trees that will soften the edge of the site at the transition with the open undeveloped Green Belt. The proposals also allow for the removal of the fencing and netting associated with the driving range to the north of the appeal site.

5.58 The land outside the appeal site boundary on the former golf course remains largely undeveloped and exhibits an open character, retaining views across the area and the visual openness of the Green Belt. This includes the land to the north and south of the appeal site.

5.59 As illustrated by the extracts of **Wireframe Photomontage 1** below when viewed from the elevated views to the north, the proposed redevelopment will be more compact in nature, reflecting the existing ridge height and set below the trees that form a backdrop to the site to the south. The development would not extend beyond the tree line into views across the undeveloped areas as the wing structure to the west of the clubhouse currently does.



*Figure 9: Extract of Wireframe Photomontage 4 Wireframe 4*

<sup>20</sup> Supplementary Openness and Landscape Appraisal, Section 6: Comparison of visual Openness of the Green Belt – Private long range views from the north and south outside the application site, paragraph 6.15, page 18

*Views from the South*

- 5.60 As illustrated in Viewpoints 3 and 4 to the south of the site, the existing line of trees to the southern boundary provide physical and visual containment, largely screening the clubhouse building, save for the projecting wings that extend to the west of the main structure.
- 5.61 The extract of **Wireframe Photomontage 3** below demonstrates that in wider views from the golf course to the south, the proposed building would be set beyond intervening trees, sitting at or below the roofline of the existing clubhouse. The compacted form of the proposals reduces the extent of the building that is visible to the west of the trees.



*Figure 10: Extract of Photomontage Wireframe 3*

- 5.62 The landscape strategy includes for additional native tree planting to the south and west of the site that will extend the existing tree lines and screen the development beyond, whilst retaining an open aspect to the foreground and allowing views across the former golf course to the elevated wooded skyline to the north to be retained.
- 5.63 When summarising the proposals as experienced in these longer range views across the undeveloped golf course, the Supplementary Openness and Landscape Appraisal identifies the following (paragraphs 6.18 – 6.21):
- The proposed building will be maintained in the same location as the existing clubhouse, against the backdrop of retained trees to the southern edge of the site.
  - The visually detracting and deteriorating clubhouse will be replaced with a more compact, high quality building.
  - Removal of the wing structures from the clubhouse will improve visual openness within wider views.
  - The development will retain the openness of the undeveloped Green Belt, including the golf course beyond the appeal site boundary.

- 5.64 At paragraph 6.24 and 6.25 when providing an overall comparison on the impacts of the proposals on openness, the appraisal states that:

*"The building prior to the fire was perceived as a sprawling form within these private long range views. The existing fire damaged building is a visually prominent structure when seen from these long range views. Its sprawling form and deteriorating condition, with extensive evidence of vandalism in an open and exposed context are detrimental to the visual openness of the Green Belt."*

*The proposed development will be less visually prominent, of a lower height, will be less sprawling and more compact. The proposals will be of a high design quality and the landscape scheme will assist in assimilating the development into the landscape to reduce the impacts on the wider undeveloped and open Green Belt land to the north."*

- 5.65 I agree with the description of the existing building as a detractor and being detrimental to the visual openness of the Green Belt, as well as the summary of the proposals and their assimilation into the landscape. I also note that the use of materials including slate, timber, green walls and grey brick will serve to reduce the visibility of the proposals and help them blend into their surroundings.
- 5.66 The Supplementary Openness and Landscape Appraisal concludes at paragraph 6.25 that on balance, the proposals will give rise to no greater harm to the visual openness of the Green Belt as experienced in long range views from the north and south of the application site within the former golf course.
- 5.67 I agree that the appeal proposals would result in no greater harm to visual openness than the current situation in these private views.
- 5.68 Indeed, given the currently open northern aspect to the site that fronts onto the former driving range and is visible from the elevated land to the north, I consider that the landscape strategy and proposals for a planted mound to the north of the site would provide a softer edge, tying in with the existing trees surrounding the site. This would provide enhancements to the character and a reduce the overall visual impact of the development when compared with the existing situation.
- 5.69 This is also the case in views from the south of the site, where additional tree planting to supplement existing mature trees will strengthen the landscape structure, offering characteristic native tree planting and softening the visual impact of development on the site.

## *PRIVATE VIEWS FROM WITHIN THE APPEAL SITE*

- 5.70 From within the appeal site, the immediate views are dominated by development, including both the structure and remaining walls of the clubhouse, fencing, retaining walls and steps at the building entrance. These features combine with the existing trees and hedgerows within and bounding the site to break up and channel views across the site and towards the open, undeveloped land within the former golf course
- 5.71 In addition to the buildings, structures and walls, the development across the PDL of the appeal site includes areas of hardstanding within the car park and access road, as well as adjacent to the driving range and paving to the front entrance of the clubhouse. The car park is contained by hedgerows, with mature trees to the southern boundary and alongside Brockley Hill to the east.
- 5.72 Despite the sprawling form of the clubhouse that extends northeast-southwest and the containment of the site by trees to the southern boundary, there are framed views across the site towards the open undeveloped land of the former golf course between buildings, trees and fences, as well as over hedges and the roof of the clubhouse.
- 5.73 These include views to the south along the frontage to the clubhouse at the car park entrance and above the hedges from within the car park, as shown on the extract below from the Supplementary Openness and Landscape Appraisal (Image K, page 13).



*Figure 11: From car park entrance looking south*

- 5.74 There are also views to the north beyond the wings of the driving range and above the ridgeline of the clubhouse towards the wooded skyline on the rising land to the north. These are illustrated in the image below looking northwest across the car park extracted from the Supplementary Openness and Landscape Appraisal (Image J, page 12)



*Figure 12: From car park looking north*

- 5.75 The proposals retain and enhance these outward views through the following measures:
- Locating the replacement building on the footprint of the existing clubhouse;
  - Consolidating the built form to a more compact layout towards the centre of the site;
  - Reducing the height of the replacement building below that of the existing clubhouse;
  - Retaining the existing car park area bound by the existing hedgerows; and
  - Retaining areas of undeveloped open greenspace to the north and south of the site.
- 5.76 This will ensure that views across the site and outward views from within it maintain the existing visual connections with the adjacent landscape and backdrops afforded by trees bounding the golf course.
- 5.77 The proposed building will retain open views across the wider golf course to the north. The building will also open up views beyond the site towards the wooded backdrop and treed skyline, with the ridge of the building being no greater than that of the clubhouse in these views. This is illustrated on Wireframe Photomontage 1 taken from the site entrance (**Appendix 3**), as well as the AVR<sub>3</sub> Photomontages from Photoviewpoint 1 (**Appendix 2**)
- 5.78 The Landscape Strategy retains the area to the north of the replacement building as an area of open wildflower meadow, allowing the views across the open landscape beyond to be retained from within the site.
- 5.79 The above is reflected within the assessment contained in the Supplementary Openness and Landscape Appraisal when considering immediate views within the appeal site, where it states<sup>21</sup>:

<sup>21</sup> Supplementary Openness and Landscape Appraisal, Section 6: Comparison of Visual Openness of the Green Belt – immediate views within the application site, paragraph 6.32, page 19



*"There will be an overall increase in building volume, as a result of the proposed redevelopment of the site. However, the proposed building will be a more compact, centralised and consolidated form and one which is less sprawling than the original clubhouse structure. The extending 'wing' structures are removed, and this will result in a greater degree of visual openness across the west of the site."*

- 5.80 Given the above factors, I consider that the Appeal Proposals would have no greater impact on the visual openness of the Green Belt as experienced from within the appeal site.
- 5.81 The proposals retain the existing outward views from within and across the site, whilst creating greater opportunities to experience views of the undeveloped, open land of the golf course through the location and compaction of the replacement building and retention of areas of open greenspace to the north and south of the site as part of the Landscape Strategy.

## IMPACTS OF ACTIVITY GENERATED BY THE PROPOSALS ON GREEN BELT OPENNESS

- 5.82 As set out within PPG, in addition to the spatial and visual aspects of openness, it may also be relevant to consider the degree of activity likely to be generated by proposals, including traffic generation.
- 5.83 The Council have not raised any concerns at either the application stage, nor within the reasons for refusal or Statement of Case in relation to any the impacts on openness associated with activity generated by the proposals.
- 5.84 Given the current position with the site being derelict and closed to the public, the site does not generate traffic movements or visitors. However, given the planning history of the site and long established previous use as a golf centre, it is relevant to consider how the activity generated by the appeal proposals compares to the activity generated by the former use (and accepted as appropriate in this Green Belt location).
- 5.85 As demonstrated within the evidence of Mr Bird, there would be significantly fewer vehicle movements associated with the use of the appeal site as a banqueting facility as proposed, compared with the use of the site as a golf centre.
- 5.86 Parking on the site will be temporary when events are being held. Previous uses resulted in a more constant presence, with larger numbers of vehicles parking on the site and visitors using the clubhouse, driving range and golf course.
- 5.87 Use of the facility will be confined to the building and outdoor spaces within the appeal site and will not encroach onto the wider golf course or driving range areas.

- 5.88 The operation of the appeal site and adjacent land as a golf course resulted in people using the driving range and players moving around the golf course surrounding the appeal site, as well as people using the facilities at the clubhouse itself. The activities and movements of these people extended across the whole of the golf course, introducing movement, activity, noise and lighting into the undeveloped, open Green Belt.
- 5.89 Conversely, the proposed use as a banqueting facility is limited to the appeal site and does not provide for access and facilities within the wider area of the former golf course. Movement and activities will be limited to those within the appeal site, on PDL and within a localised setting with landscaped boundaries providing visual containment. This would result in a lesser degree of movement and activity than the previous golf course use.

## CONCLUSION

- 5.90 Having assessed the impacts of the appeal proposal upon the openness of the Green Belt, I conclude the following:
- The appeal site does not contribute to any of the five Green Belt purposes as set-out at paragraph 138 a-e of the NPPF. This is a position with which the Council agree.
  - Given the containment of the appeal site within the surrounding landscape and on previously developed land, any impacts on the Green Belt associated with the appeal proposals will be limited and highly localised.
  - The above factors ensure that the impacts on the spatial openness of the Green Belt are highly localised within an area of PDL, retaining the openness of surrounding land within the driving range and golf course.
  - My assessment of the visual impacts of the proposals, informed by wireframe photomontages from within the golf course and rendered montages from the site entrance has found that there would be no overall greater visual harm to the openness of the golf course arising from the proposed redevelopment than the current situation.
  - The structural planting proposed by the Landscape Strategy will introduce characteristic native tree planting to the north of the buildings, softening development and tying-in with the surrounding wooded backdrop.
  - Compared with the former golf centre, the use of the appeal site for a Banqueting Facility will give rise to fewer vehicle movements and parked vehicles over a shorter, more limited time frame. Use of the facility will be confined to the building and outdoor spaces within the appeal site.

## 6 EFFECTS ON THE CHARACTER AND APPEARANCE OF THE AREA

### SCOPE OF EVIDENCE

- 6.1 The second reason for refusal focusses on the design and form of the proposed building and the associated impact upon the character and appearance of the locality within the context of a Green Belt site, stating that the building would appear as unsympathetic and obtrusive in an open setting.
- 6.2 The emphasis of the reason for refusal is upon the architectural and built elements of the appeal proposals. Mr Thornton deals with the design of the proposed building and how the proposals have been developed to provide a development that is appropriate to the local character, and sympathetic in its response to the landscape and Green Belt.
- 6.3 As I consider further below, the Landscape Strategy and native tree planting ties in with the surrounding and reflects the local character, reinforcing and strengthening key features and character of the area.
- 6.4 The Council's Statement of Case emphasises that the appeal site is situated within the Harrow Weald Ridge Area of Special Character. Core Strategy Policy CS7A requires development to maintain the special character and key views of the Harrow Weald Ridge.
- 6.5 Policy DM6 states that any development within the Area of Special Character should have regard to
- "the significant backdrop it provides to the generally lower suburban development to the south, inclusion of high ground with extensive tree cover and major open areas."*
- 6.6 Mr Thornton considers the appeal proposals and proposed building in relation to the character of buildings and development that is found within the Harrow Weald Ridge Area of Special Character. His evidence has been informed by the Character Assessment of Harrow's Residential Areas [CD 19]
- 6.7 I consider the effects of the proposals upon the landscape character, including the key characteristics, features and views associated with the Area of Special Character as identified by the development plan and policies CS7A and DM6 and supporting SPD and evidence based documents.
- 6.8 I also consider the acceptability of the proposals in relation to Core Strategy Policy CS1.B and Development Management Policy DM1 as relates to the landscape character and features of the appeal site and local landscape.

## APPELLANT'S LANDSCAPE AND VISUAL APPRAISAL

- 6.9 I draw upon the findings of the LVA, which has undertaken a site-specific assessment of the appeal site and its local context after the fire which damaged the clubhouse, as well as an analysis of the published landscape character assessments and studies that inform and provide evidence to the adopted development plan (Core Strategy and Development Management Policies Local Plan).
- 6.10 I note that within both the June 2021 and November 2021 officer reports, the Council's Landscape Officer raises no concerns with the proposals from a landscape or visual perspective and agrees with the findings of the LVA.
- 6.11 The Landscape Officer comments in the November 2021 officer report relate to the "updated landscape report" that includes reference to the fire damaged buildings and derelict condition.
- 6.12 The LVA concluded the following<sup>22</sup> in relation to the character of the area:
- The appeal site is developed in character and declining, derelict condition. In its current state it is a detracting feature within the landscape.
  - The majority of all landscape features found on the appeal site will be retained and enhanced, with the exception of two grade C trees that are to be removed for arboricultural reasons.
  - Additional characteristic trees, hedging and meadow planting will be provided to increase habitats and provide ecological, landscape character and amenity enhancements.
  - The proposals will improve the appearance and amenity of a previously developed site which is in poor condition, with detracting features and declining quality.
  - The implications of the development on landscape character are limited, providing benefits to the landscape character and improvements to the current situation.
- 6.13 The LVA also identifies that, in relation to the Area of Special Character, Key Views and published landscape character assessment that supports the development plan:
- The development does not impact on any key views identified within the Harrow Key Views Assessment.
  - The development does not impact upon the characteristics of the Harrow Weald Ridge Area of Special Character.
  - The proposals include characteristic features which are present within the wider landscape and detailed within the 'Barnet Plateau' LCT.

---

<sup>22</sup> Landscape and Visual Appraisal, Section 7: Conclusion, page 34

- 6.14 In relation to visual amenity and visual impacts, the LVA identifies that effects on visual amenity will be limited and localised, with the only publicly available views into the site being those obtained from Brockley Hill at the site entrance. For these receptors, the LVA concludes that the proposals will result in beneficial changes to these views through the replacement of the damaged and derelict building and additional characteristic planting to soften the proposals.
- 6.15 Having visited the appeal site and surrounding area and undertaken a review of the application material, I agree with the findings of the LVA in respect of the limited effects upon the character and appearance of the area and ability of the appeal proposals to provide benefits and enhancements to the landscape features on the site that will strengthen and be in keeping with the character of the area.

### OFFICER'S REPORT AND CONSULTATION RESPONSES

- 6.16 The assessment in the November 2021 Officer's Committee report considered the design of the proposed building and its impact on the character and appearance of the locality to be acceptable. Officers also considered the proposals are acceptable in terms of trees, landscaping and biodiversity subject to planning conditions to secure tree protection measures, landscaping and biodiversity net gain.
- 6.17 Furthermore, the Council's Landscape Officer had no objections to the Landscape Strategy Plan, with the June 2021 officer's report<sup>23</sup> agreeing that:

*"Additional tree and hedge planting is proposed in character with the area, to integrate the building into the landscape."*

- 6.18 As considered within the LVA and agreed in both the June and November 2021 Officer's Reports, the proposed replacement building will not be visible in long and medium distance views outside the site, beyond the extents of the former golf course that is bound by mature trees and woodland at Stanmore Country Park to the west and Pear Wood to the north, as well as mature trees and hedgerows to Cleopatra Close Park to the south and Brockley Hill to the east.
- 6.19 Publicly accessible views into the site are limited to those obtained from the site entrance and adjacent pavement along Brockley Hill.
- 6.20 The above areas of agreement and the fact that the Council's Landscape Officer raised no objections with the findings of the LVA or the Supplementary Openness and Character Appraisal highlights that the appeal proposals respect the landscape character and offer opportunities to improve the current baseline conditions through the removal of a derelict and damaged building and the implementation of the landscape strategy.

---

<sup>23</sup> June 2021 Officer's Report, Biodiversity, Landscaping and Trees, paragraph 6.62

- 6.21 It is also significant that at the application stage, and within reason for refusal 2, the Council did not raise any conflicts with Policies C7A or DM6 which relate to the Area of Special Character. These policies were only introduced within the Statement of Case.
- 6.22 As summarised above, the LVA assessed the scheme as having no impact on key views or characteristics and strategic value of the Harrow Weald Ridge Area of Special Character. The Landscape Officer did not raise any objections to these findings.

## SITE SPECIFIC CHARACTER

- 6.23 The LVA provides an assessment of the appeal site and its surrounding, identifying the key features and characteristics of the site, and providing a record of the condition of the site and buildings since the fire.
- 6.24 When summarising the landscape context, the LVA concludes that:<sup>24</sup>

*3.35 The site is located to the south east of Stanmore Country Park. This area is listed as an example of a natural landscape within the LCA with long views from remnant heathy commons. The wider golf course shares some of the characteristics with the LCA, with wider views and an open character from the higher parts of the golf course. The site itself does not exhibit these characteristics, with the presence of boundary vegetation and developed built form limiting wider views and providing a more developed character.*

*3.36 The site is situated within the urban fringe, and its previous golf course land use. The club house, areas of hardstanding and urbanising features such as lighting columns and netting provide a developed character within the landscape. The derelict nature of the club house building, vandalism and its declining condition are detracting features within the landscape.*

*3.37 The presence of mature vegetation found along the eastern boundary along Brockley Hill separates the site from the wider landscape to the east and there is no interconnectivity between the site and the landscape beyond.*

*3.38 The site falls within close proximity to the M1 to the north and provides further urbanising influences along with the busy road of Brockley Hill the site is not set in a tranquil or unsettled context.*

*3.39 The presence of mature vegetation at the western part of the golf course separates the site from Stanmore Country Park and there is no interconnectivity between this area or the site with views filtered by mature trees and woodland.*

---

<sup>24</sup> LVA, Section 3: Landscape Context Summary, paragraphs 3.35 – 3.41, page 12

*3.40 Existing tree planting found within the site is typical of golf course landscaping, and amenity landscaping around the car parking. There are however some scattered willows found on the southern part of the site which are characteristic of the published LCA.*

*3.41 Overall the site does not share characteristics with the published Landscape Character Assessment and the characteristics of the 'Barnet Plateau' LCA. It exhibits characteristics of a developed and urban fringe landscape in comparison to the wider open and undeveloped land of the golf course which is more representative of the 'Barnet Plateau' LCA."*

- 6.25 As summarised within the LVA and illustrated by the set of site photographs included within Section 3 of the report<sup>25</sup>, the appeal site is derelict and in poor condition. The fire damaged clubhouse has been subject to vandalism and graffiti, and fly tipping and lack of management have contributed to the degraded nature of the landscape.
- 6.26 There are opportunities to improve the character and condition of the site and landscape through the redevelopment of the site, incorporating high quality and sympathetic buildings and an appropriate landscape scheme.
- 6.27 I note that the Council's Statement of Case also recognises the developed context of the appeal site, amenity landscape of the former golf course and the urban fringe context within which the site and golf course are situated on the edges of the urban area of Harrow. When describing the appeal site at Section 2.0, the Council's SoC states:

*2.9 A wire fence of approximately 5 metres in height has been erected around the former driving range. This is secured by a number of metal pylons running around the perimeter of the range at a distance of approximately 15 to 20 metres apart. There is also a substantial earth bund around the driving range covered by grass.*

*2.10 The area of land surrounding the driving range comprises the golf course and appears as a managed landscape with man-made features including green, bunkers and tee boxes.*

*2.12 The site is screened by mature trees and hedges to the entire perimeter of the site.*

*2.18 The immediate locality of the wider application site comprises a mix of residential and leisure uses.*

---

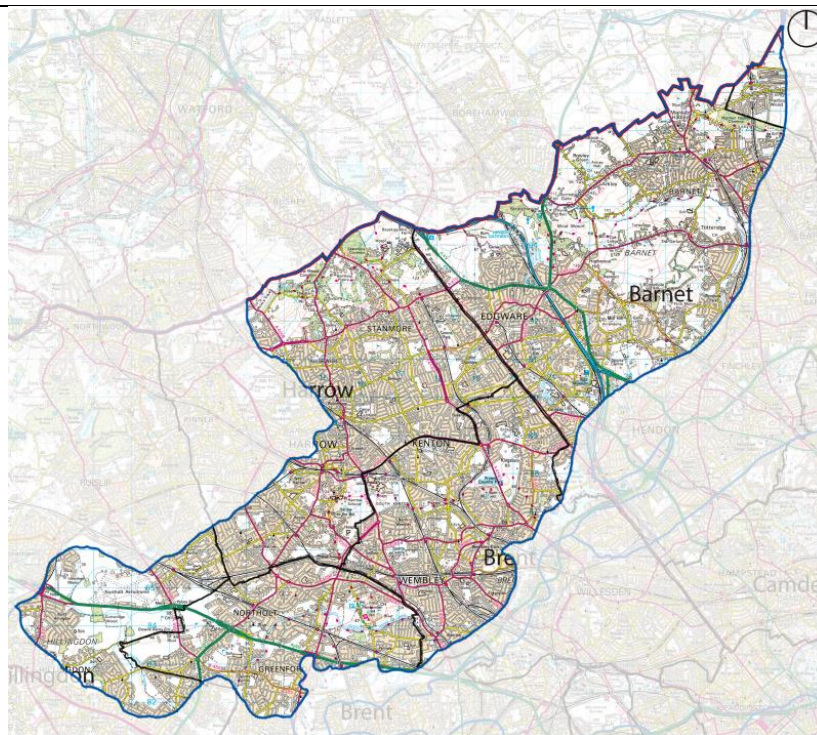
<sup>25</sup> LVA, Section 3 – Landscape Context: Images A – F, pages 8 - 10

## PUBLISHED LANDSCAPE CHARACTER ASSESSMENTS

### *LONDON'S NATURAL SIGNATURES: THE LONDON LANDSCAPE FRAMEWORK, 2011*

#### *Barnet Plateau Natural Landscape Area*

- 6.28 The appeal site is situated within the Barnet Plateau Natural Landscape Area (NLA). As illustrated on the extract below, the NLA covers an extensive area. The description and characteristics of the area are therefore generalised and do not relate specifically to the site or its local context.
- 6.29 However, the key influences of the area give an indication of those characteristics and features that are typical of the wider plateau and those which may be of relevance to the appeal site and proposals.
- 6.30 These include long views from remnant heathy commons, coppice woodland, secondary birch woodland, lines of willow marking meandering alignment of streams, veteran trees and ancient hedgerows and traditional 'patchwork' of pastures and meadows.



*Figure 13: Barnet Plateau Natural Landscape Area*



6.31 The appeal site is situated on lower-lying ground set below the elevated land of the golf course and does not share the long range views identified for the Barnet Plateau. Whilst the boundaries of the appeal site share some of the characteristics including native trees and hedges, the site is developed and situated within an urban fringe context.

6.32 When summarising the landscape context<sup>26</sup> the LVA concludes that:

*"Overall the site does not share characteristics with the published Landscape Character Assessment and the characteristics of the 'Barnet Plateau' LCA. It exhibits characteristics of a developed and urban fringe landscape in comparison to the wider open and undeveloped land of the golf course which is more representative of the 'Barnet Plateau' LCA."*

6.33 I agree with the observations of the LVA. As examined in further detail below, the appeal site is developed and situated on lower lying ground and does not contribute to the distinctive character of the elevated wooded slopes and plateau with long views that characterise the Harrow Weald Ridge.

## HARROW WEALD RIDGE AREA OF SPECIAL CHARACTER

6.34 The following evidence base documents support the development plan and provide some background to the criteria used when designating the Area of Special Character and the characteristics and features of strategic importance and value.

### CHARACTER ASSESSMENT OF HARROW'S RESIDENTIAL AREAS

6.35 The assessment focuses on residential development, including that within the Harrow Weald Ridge Area of Special Character. Mr Thornton refers to examples of development within the area when considering the character and design of the proposals.

6.36 At paragraph 4.14, the assessment provides some background to original designation of the Harrow Weald Ridge as an Area of Special Character, reflecting its strategic importance. The criteria used were:

*"having regard to the significant backdrop it provides to the generally lower suburban development to the south, inclusion of high ground with extensive tree cover and major open areas".*

---

<sup>26</sup> LVA Section 3: Landscape Context – Summary, paragraph 3.14, page 12

## *HARROW WEALD CONSERVATION AREAS SUPPLEMENTARY PLANNING DOCUMENT*

- 6.37 The Conservation Areas SPD focusses upon the areas designated as conservation areas within the High Weald area. There are no conservation areas in proximity to the appeal site.
- 6.38 However, the SPD provides more generalised guidance in relation to Issues and Opportunities for Enhancement, stating at paragraph 4.1.19 that parts of the Harrow Weald Ridge provide substantial tree cover and extensive tracts of open and natural land which give rise to environmental consequences that make a positive contribution to their special character. These include significant areas of low light, air and noise pollution and places for undisturbed habitat formation and wildlife movement.
- 6.39 Given the location of the appeal site next to the A5 (Brockley Hill) and urban edge, there is light, air and noise pollution, as well as impacts on tranquillity.
- 6.40 The appeal site and golf course are of limited ecological and wildlife value, comprising derelict PDL and an amenity landscape.
- 6.41 The proposals offer opportunities to improve the character and condition of the site and provide enhancements for biodiversity.

## *HARROW KEY VIEWS ASSESSMENT*

- 6.42 Policy DM6 identifies the protected views to and from Areas of Special Character.
- 6.43 The Harrow Key Views Assessment identifies views from the Wood Farm Viewpoint as a protected view looking out across Harrow and Greater London skyline from the Harrow Weald.
- 6.44 The viewpoint is illustrated on **Figure 4: Policy Context** (Volume 2 of my evidence) . As shown on the extract of LVA Photoviewpoint 10 on Figure 4, the appeal site is not visible from the vantage point, being situated beyond intervening woodland at Pear Wood.
- 6.45 I note that Policy DM 3 'Protected Views and Vista' is not cited within the reasons for refusal or the Councils SoC. This recognises that the appeal site and proposals will not be visible in any protected views.

## LANDSCAPE SENSITIVITY

- 6.46 The LVA assesses the appeal site as being of a low sensitivity to the proposed development. This reflects an assessment of the value and susceptibility of the landscape to the proposals.

## LANDSCAPE SUSCEPTIBILITY

- 6.47 Susceptibility to change is defined by the guidelines for Landscape and Visual Impact Assessment (GLVIA) as:

*"... the ability of the landscape receptor ... to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and / or the achievement of landscape planning policies and strategies"<sup>27</sup>*

- 6.48 The LVA assess the susceptibility of the landscape to the appeal proposals as Low. This reflects the fact that the redevelopment of the site would be consistent with the character of the area, with built form already present on the site and the new building being in the same location as the existing clubhouse, enhancing the currently dilapidated and detracting features after the fire damage. The LVA also recognises that the retention of the existing boundary hedgerow separates the site from the open undeveloped land of the wider golf course.
- 6.49 I agree that the landscape is of a low susceptibility to the appeal proposals. In addition to reflecting the existing baseline and offering improvements to the currently poor condition and damaged, derelict buildings and structures on the appeal site, the proposals will not affect those special qualities and values of the Area of Special Character that are protected by local planning policies. I examine matters relating to the locally designated landscape and value further below.

## LANDSCAPE VALUE

- 6.50 The appeal site has been assessed by the LVA being localised and low value.
- 6.51 The LVA also assess the Harrow Weald Ridge Area of Special Character as not being a valued landscape under the provision of NPPF paragraph 174(a), being a non-statutory local landscape designation.
- 6.52 I agree with the findings of the LVA inasmuch as the appeal site itself is not a valued landscape and is of a low value.

## CONTRIBUTION OF THE APPEAL SITE TO THE CHARACTER AND STRATEGIC VALUE OF THE AREA OF SPECIAL CHARACTER

- 6.53 As illustrated by the aerial image on **Figure 3**, the Area of Special Character covers a large area and contains a wide variety of different development and land uses, including residential areas, hospital and leisure development, as well as roads and infrastructure. There are also a variety of different amenity and leisure uses across the area, ranging from formal sports pitches and golf courses to country parks and open spaces and nature reserves.
- 6.54 As **Figure 4** shows, in the locality of the appeal site there is substantial development at the Royal National Orthopaedic Hospital, as well as modern residential development beyond Cleopatra Close Park / Brockley Park south of the golf course, as well as the busy A5 road at Brockley Hill that passes the site, introducing movement, noise and lighting along the route of the road and within residential area to the south and north.
- 6.55 It is therefore apparent that the Area of Special Character does not serve to restrict development, but rather to ensure that development is sensitive to those qualities that are identified as being distinctive and of strategic value. This is reflected in the wording of Policy DM6 which states that proposals affecting an area of special character will be considered having regard to:

*A - The impact of the proposal upon the strategic value of the area of special character;*

*B - The desirability of preserving or enhancing the environmental, architectural, historic and landscape features that contribute to the area of special character; and*

*C - The protected views to and from areas of special character.*

- 6.56 The policy states that proposals that would substantially harm an area of special character, or its setting, will be refused.
- 6.57 The supporting text to policy DM6 states at paragraph 2.37 that:

*"The strategic value of the Harrow Weald Ridge and Pinner Hill area of special character is as a significant landscape backdrop that comprises extensive tree cover, including the cumulative contribution of small groups and individual trees, and major open areas."*

- 6.58 The text continues at paragraph 2.42:

*"In landscape terms, the skyline of Harrow Weald Ridge and Pinner Hill on the horizon, and the distinctive profile of Harrow on the Hill, are closely related to the strategic value of these areas of special character. However, other features such as ponds, meadows, hedges, ancient field patterns, dykes and ditches may also be important to the special character of these areas."*

- 6.59 The appeal site comprises PDL, with the former clubhouse, driving range, car parking and areas of hardstanding and associated structures. The proposals do not introduce development and built form into the undeveloped countryside or landscape.
- 6.60 As the above analysis has demonstrated, the appeal site does not share the special characteristics and qualities of the wider, undeveloped landscape of the Area of Special Character that are recognised as being of particular strategic value and importance and are specifically mentioned in policy for their protection.
- 6.61 The appeal site does not extend to the upper slopes and skylines and does not contribute to the wooded skyline and attributes of strategic value. Whilst there are mature trees to the southern and eastern boundaries of the site, there are few natural landscape features within the site or adjacent amenity landscape for the former golf course that contribute positively to the character of the local landscape or wider Area of Special Character.
- 6.62 Whilst the Harrow Weald Ridge Area of Special Character is identified as being of “Strategic Value” this is in recognition of the “significant landscape backdrop” comprising extensive tree cover and major open areas. Areas of development are not identified as contributing to these qualities.
- 6.63 The detailed site-specific analysis of the landscape value indicators contained within the LVA has found that the appeal site is ordinary and of a low, localised value. This is by virtue of the development on the site and poor condition with deteriorating condition. The assessment is supported by an analysis of a factors as set out within published guidance<sup>28</sup>, including condition, scenic quality, recreation value and function.

### SUMMARY OF EFFECTS

- 6.64 Given the physical and visual containment of the appeal site within the extents of the former golf course and limited nature of the redevelopment of existing PDL and buildings, the impacts upon the character and appearance of the landscape are limited and localised.
- 6.65 The appeal site does not share the key characteristics and features of the wider Area of Special Character, and the former golf course comprises an amenity landscape with associated earthworks, bunkers, greens and tees, the open character of the golf course provides a setting to the woodland at Stanmore Country Park and edge of Pear Wood that sits on the elevated land to the north.
- 6.66 As examined in relation to the openness of the Green Belt at Section 5 of this Proof of Evidence, the proposals retain the visual openness of the area, with the replacement building being of a more compact form, with a reduced ridge height, allowing for views from within and across the site towards the wooded and treed backdrop to be retained.

---

<sup>28</sup> GLVIA Box 5.1 – Range of factors that can help in the identification of valued landscape, page 84, and Landscape Institute Technical Guidance Note on Assessing Landscape Value Outside National Designations (TGN 02/21)

- 6.67 The proposals would not impact upon the open slopes across the former driving range that extend towards Pear Wood to the north, which contribute to the wider backdrop and elevated horizon of tree cover and open countryside that is identified as being of strategic value.
- 6.68 Whilst there are no public views from within the appeal site, as illustrated by **Photoviewpoint 4 (Volume 2 - Figure 2)** taken from the upper slopes north of the driving range, there are private views from this elevated location across Harrow and the wider urban area.
- 6.69 **Wireframe Photomontage 4 (Appendix 3)** demonstrates that the proposed building would sit below the existing backdrop of trees that bound the site to the south, being contained within the site and retaining these elevated views.
- 6.70 These factors are also recognised by the assessment contained within the LVA which summarises in relation to Landscape Effects and the Harrow Weald Ridge Area of Special Character<sup>29</sup>

*6.52 The development will enhance and improve the existing situation, with the new building, associated characteristic landscaping and integration with the wider landscape improving the existing situation and poor quality, detracting features removed.*

*6.53 The redevelopment of the site will not impact on the character of the Barnet Plateau LCA, nor will it be detrimental to the characteristics of the Harrow and Weald Ridge Area of Special Character, with the more undeveloped land to the north within the former golf course retaining the more characteristic features associated with the 'Barnet Plateau' LCA and Harrow Weald Ridge Area of Special Character.*

*6.54 Within the open and undeveloped area of the site at its northern edges, the scheme proposes a landscaped buffer which will increase the characteristic wooded landscape. This landscaped edge will assimilate the new building into the surrounding area and will create a vegetated edge to the site which will separate the site from the open and undeveloped land to the north.*

*6.55 In turn, the proposals will maintain development on the existing location of built form in a more consolidated and compact way, with the proposed built form located centrally to minimise extending into the open and undeveloped parts of the site. Its redevelopment will enhance and improve the character of a site which is in a declining condition.*

- 6.71 I agree with the findings of the LVA that the appeal proposals would not impact upon the woodland, skylines or views identified as the characteristics and qualities of strategic importance within the Area of Special Character which Policy DM6 seeks to preserve.

---

<sup>29</sup> LVA, Section 6: Implications of Development – Landscape Effects Summary, paragraphs 6.50 – 6.55, page 33

- 6.72 I also agree with the findings of the LVA that the redevelopment of the appeal site will not impact on the character of the Barnet Plateau Natural Landscape Area (NLA).
- 6.73 The Landscape Strategy incorporates existing trees to the site boundaries and provides additional native structural tree planting to strengthen the landscape structure, reinforce the containment of the appeal site and distinction between the site and open, undeveloped land, whilst tying-in with the wooded backdrop and context provided by the woodland that bounds the former golf club.
- 6.74 The proposals also incorporate hedgerows, wildflower meadows and SuDS incorporating swales and a pond with marginal vegetation managed for biodiversity and wildlife. These features will add to the overall character, biodiversity and functionality of the local landscape.
- 6.75 The landscape proposals therefore offer benefit and enhancements to the local landscape, reflecting the guidelines and design cues for the Barnet Plateau Natural Landscape Area including blocks of silver birch, hedgerows defining wildflower meadows within open space, wet ditches and shallow attenuation basins with wet grassland habitat, meandering lines of willow and planting of hornbeam and oak.
- 6.76 These improvements associated with the Landscape Strategy are recognised within the June 2021 Officer's Report.
- 6.77 I therefore consider the appeal proposals to conform with Development Management Plan Policy DM1, Part B point e through the retention and enhancement of existing landscape, trees, and biodiversity.
- 6.78 The NPPF at paragraph 130c and Core Strategy Policy CS1.B require proposals to respond positively to the local context and reinforce the positive attributes of local distinctiveness. This has been achieved by the appeal scheme through the retention of existing woodland, trees and hedgerows and provision of new planting, landscape areas and habitats in line with guidance for the Barnet Plateau Natural Landscape Area, as set-out in the Natural Signatures: The London Landscape Framework.
- 6.79 I also consider the proposed development to accord with the requirements of Harrow Core Strategy Policy CS7A and Development Management Plan Policy DM6. The proposals have been demonstrated to respect and preserve the characteristics of the wider Area of Special Character identified as being of strategic value and their setting. The proposals also offer opportunities to retain and enhance characteristic woodland planting and features for biodiversity, including wildflower meadows and water features managed for wildlife.

6.80 The proposals would not adversely impact on the ridge and wooded backdrop or identified key views to or from the Harrow Weald Ridge Area of Special Character. As I have demonstrated within this proof of evidence, the appeal proposals preserve private views across the appeal site and golf course to the wooded backdrop and skyline at Stanmore Park and Pear Wood, whilst retaining and improving private views from the elevated land north of the driving range across the wider landscape and skyline of Harrow and Greater London to the south.



## 7 SUMMARY AND CONCLUSIONS

- 7.1 My name is Robert Hughes, I am a Director at Incola Landscape Planning and specialise in landscape and visual planning issues associated with development and change. I hold a BSc (Hons) degree in Rural Resources Management from the University of Wales Aberystwyth and a Post Graduate diploma in Landscape Architecture from the University of Central England. I am a Chartered Member of the Landscape Institute (LI).
- 7.2 I have over 19 years of professional experience or providing professional landscape and visual planning advice on a wide variety of projects throughout the United Kingdom. I have extensive experience of working on projects within the Green Belt, including undertaking Green Belt Reviews, promoting land for release from Green Belt within development plans and providing expert witness services in relation to planning appeals for the redevelopment of previously developed land in the Metropolitan Green Belt.
- 7.3 The majority of my career has been involved in the assessment of landscape and visual effects of residential development on greenfield land and associated landscape design inputs. Over the past ten years I have given evidence at Planning Inquiries, Appeal Hearings and Examinations in Public.

### MAIN ISSUES AND SCOPE OF EVIDENCE

- 7.4 I was appointed in May 2022 to prepare evidence and appear as an expert witness on behalf of Sairam (Holdings) Ltd in respect of the refusal of planning application reference P/3088/20 by Harrow Council (the Council).
- 7.5 The planning application was accompanied by a Supplementary Openness and Landscape Appraisal prepared by Cornus Landscape Planning and Design. The appraisal includes an updated Landscape and Visual Appraisal I (LVA) at Appendix 1 [CD 78] that was prepared to reflect the site conditions in September 2021 after the fire damaged the golf club building.
- 7.6 I assisted in the preparation of both the Supplementary Openness and Landscape Appraisal and LVA.
- 7.7 The Supplementary Openness and Landscape Appraisal and LVA comprise the most up-to-date consideration of the appeal site and its capacity to absorb change. The Council have raised no technical concerns with the approach or findings of the LVA of the Openness and Landscape Appraisal at either application stage, within the Officer's Report or within their Statement of Case.
- 7.8 The Council's Landscape Officer raised no objection within the November 2021 Officer's Report to the findings of the updated reports with reference to the fire damaged building.
- 7.9 As confirmed by the Inspector at the Case Management Conference (CMC) held on 22nd August 2022, the main issues for the appeal that relate to Reasons for Refusal 1 and 2 are:

- The effect of the development upon the openness of the Green Belt; and
- The effect of the development on the character and appearance of the area.

7.10 Both the appellant and the Council are in agreement that the proposal constitutes inappropriate development in the Green Belt.

7.11 My evidence has dealt with matters relating to the spatial and visual openness of the Green Belt, and the effects of the proposed development upon the landscape character of the area.

## SITE CONTEXT

7.12 The appeal site covers an area of 1.63 hectares and lies to the west of and adjacent to Brockley Hill (the A5) upon the site of a former 9 hole golf course and driving range. The site contains the remains of the former golf centre clubhouse building that was damaged by a fire in June 2020, as well as a storage building, car park and other areas of hard standing associated with the former golf centre.

7.13 The site is situated within the Metropolitan Green Belt. The site comprises Previously Developed Land (PDL) within the Green Belt and is situated within the Harrow Weald Ridge Area of Special Character, a local, non-statutory designation within the Harrow development plan.

7.14 The driving range extends to the north of the appeal site on land which rises towards Pear Wood. The former golf course wraps around the driving range, which is defined by bunding, ditches and netting and associated supports.

7.15 The appeal site and wider site comprising the golf course and driving range are contained by woodland at Stanmore Country Park to the west, Pear Wood to the north and mature belts of trees along Brockley Hill to the east.

7.16 To the south, the golf course is bound by mature hedgerows and trees to the north of properties on Cleopatra Close and Augustus Close that are situated approximately 285m south of the clubhouse, and 125m south of the wider site area of the golf course.

7.17 Mature trees to the south of the car park and clubhouse and hedgerows bounding the car park separate the appeal site from the golf course to the south.

7.18 There is no public access to the appeal site or grounds of the driving range and former golf course.

7.19 The appeal site comprises PDL, with the former clubhouse, driving range, car parking and areas hardstanding and associated structures. The proposals do not introduce development and built form into the undeveloped countryside or landscape.

## PROPOSED DEVELOPMENT

- 7.20 The siting and layout of the proposed building has been designed to minimise the impacts on the surrounding area. The location of the proposed building reflects that of the existing building, located on previously developed land, and is of a more compact form.
- 7.21 The containment by and setting in relation to the existing trees will screen and soften views of the proposed building, reducing the visual impacts and those upon the openness of the surrounding land within the former golf course outside the appeal site.

## LANDSCAPE STRATEGY

- 7.22 The landscape proposals were developed as part of the iterative design process for the redevelopment of the clubhouse and included consultation with the design team at the Council. They form an integral part of the overall scheme, ensuring that the proposals provide a contextual fit, minimising visual impacts, respecting the landscape character and retaining the openness of the Green Belt.
- 7.23 The landscape strategy incorporates the existing trees, hedgerows and boundary vegetation, with additional tree planting and hedgerows increasing characteristic features, integrating the building into its setting.
- 7.24 The new planting to site boundaries and landscaped edge maintains the undeveloped land of the adjacent former golf course, tying-in with and reinforcing existing trees and hedgerows to assimilate the proposals into the landscape.
- 7.25 The more formal, managed areas within the appeal site reflect the former character of the clubhouse, car park and driving range and use of the adjacent land as a golf course, an amenity landscape set-out with fairways, bunkers and greens. The proposed landscaped mound to the northern edge of the appeal site reflects the land modelling across the former golf course associated with fairways, greens and bunkers.
- 7.26 The Landscape Officer confirmed in the June 2021 Officer's Report that the proposals are acceptable in terms of trees, landscaping and biodiversity, subject to planning conditions.

## CONTRIBUTION TO THE PURPOSES OF THE GREEN BELT

- 7.27 The appeal site does not contribute to any of the five Green Belt purposes as set-out at paragraph 138 a-e of the NPPF. This is a position with which the Council agree. The site is previously developed land, contained within the site of the golf course which is separated from the settlement edge at Stanmore by mature trees and woodland. Robust sequential testing undertaken by the Appellant has demonstrated that there is no alternative suitable site available for the proposed redevelopment as a banqueting facility. and use.
- 7.28 Both national and local policy seeks to enhance the beneficial use of land within the Green Belt, retaining and enhancing landscapes, visual amenity and biodiversity and quality of the environment. As set out at NPPF paragraph 145, this may also include the improvement of damaged and derelict land.
- 7.29 The redevelopment of the appeal site will renew a degraded and derelict site, providing a high quality new building and landscape scheme that will respect the surroundings, improve the character and provide a Biodiversity Net Gain of 20% and 49.95% hedgerow units<sup>30</sup>.
- 7.30 This accords with the provision of both the NPPF and Policy G2 of the London Plan.

## EFFECTS ON THE OPENNESS OF THE GREEN BELT

- 7.31 Given the containment of the appeal site within the surrounding landscape and on previously developed land, any impacts on the Green Belt associated with the appeal proposals will be limited and highly localised.

## SPATIAL IMPACTS ON OPENNESS OF THE GREEN BELT

- 7.32 Although the fire has damaged the clubhouse building, with the upper floor and ridge defined by the framework formed by the steels, the volume of the building is still appreciable. The openness within the steel framework is contained within a substantial structure which limits the perceived openness when moving around the appeal site and golf course. The extent of the hardstanding associated with the car park, access road and surrounding the clubhouse remain unaffected by the fire.
- 7.33 Whilst the redevelopment will result in an increase in the overall footprint and volume of development on the appeal site, the proposals are of a lower height than the existing structure of the clubhouse and are of a condensed form, situated towards the centre of the site on area of previously developed land.

---

<sup>30</sup> Statement of Common ground, paragraph 7.49, page 27

- 7.34 The proposals retain the wooded backdrop and setting on the skyline formed by woodland at Stanmore Country Park and Pear Wood on the elevated land to the north. The existing and proposed trees and hedgerows to the site boundaries add further containment to the appeal site within the golf course.
- 7.35 The above factors ensure that any impacts on the spatial openness of the Green Belt are highly localised within an area of PDL, retaining the openness of surrounding land within the driving range and golf course.

## *VISUAL IMPACTS ON OPENNESS OF THE GREEN BELT*

- 7.36 My assessment of the visual impacts of the proposals, informed by wireframe photomontages from within the golf course and rendered montages from the site entrance has found that there would be no overall greater visual harm to the openness of the golf course arising from the proposed redevelopment than the current situation.
- 7.37 The location of the proposed building and more compact nature of development will retain the internal views across the appeal site, including those across the car park and to the driving range to the north.
- 7.38 In views from the site entrance at Brockley Hill, the proposals will be set beyond existing and proposed tree and hedgerow planting. The ridgeline of the proposed buildings is set below the wooded skyline, with the building located centrally within the site and on the same location as the existing clubhouse.
- 7.39 In private views across the former golf course to the south of the appeal site, the building is set beyond trees to the southern boundary. The compact form of the proposals reduces the development visible beyond the trees associated with the wings of the clubhouse. Views towards the wooded skyline and open undeveloped slopes of the driving range and golf course are retained.
- 7.40 From the north, in private views from the elevated land north of the driving range, the reduced height and compact form of the proposed building is set in front of and below the tops of the existing trees that bound the site. Views across the golf course towards the Harrow skyline and towards Greater London are retained.
- 7.41 The structural planting proposed by the Landscape Strategy will introduce characteristic native tree planting to the north of the buildings, softening development and tying-in with the surrounding wooded backdrop.

## IMPACTS OF ACTIVITY GENERATED BY THE PROPOSALS ON OPENNESS OF THE GREEN BELT

- 7.42 The Council have not raised any concerns at either the application stage, nor within the reasons for refusal or Statement of Case in relation to any the impacts on openness associated with activity generated by the proposals.
- 7.43 Compared with the long established previous use of the site as a golf centre, the proposed use for a Banqueting Facility will give rise to significantly fewer vehicle movements. Parking on the site will be temporary, when events are being held. Previous uses resulted in a more constant presence, with larger numbers of vehicles parking on the site and visitors using the clubhouse, driving range and golf course. Use of the facility will be confined to the building and outdoor spaces within the appeal site and will not encroach onto the wider golf course or driving range areas.

## EFFECTS ON THE CHARACTER AND APPEARANCE OF THE AREA

- 7.44 Given the physical and visual containment of the appeal site within the extents of the former golf course and limited nature of the redevelopment of existing PDL and buildings, the impacts upon the character and appearance of the landscape are limited and localised.
- 7.45 The appeal site comprises Previously Developed Land, with the former clubhouse, driving range, car parking and areas of hardstanding and associated structures. The proposals do not introduce development and built form into the undeveloped countryside or landscape.
- 7.46 The former golf course comprises an amenity landscape with associated earthworks, bunkers, greens and tees. The open character of the golf course provides a setting to the woodland at Stanmore Country Park and edge of Pear Wood that sits on the elevated land to the north. The appeal site does not share the key characteristics and features of the wider Area of Special Character.
- 7.47 The proposals retain the visual openness of the area, with the replacement building being of a more compact form, with a reduced ridge height, allowing for views from within and across the site towards the wooded and treed backdrop to be retained.
- 7.48 The proposals would not impact upon the open slopes across the former driving range that extend towards Pear Wood to the north, which contributes to the wider backdrop and elevated horizon of tree cover and open countryside that is identified as being of strategic value.
- 7.49 In private views from the elevated land north of the driving range, there are views across Harrow and the wider urban area. In these views the proposed building would sit below the existing backdrop of trees that bound the site to the south, being contained within the site and retaining these elevated views.

- 7.50 The appeal proposals would not impact upon the woodland, skylines or views identified as the characteristics and qualities of strategic importance within the Area of Special Character which Policy CM6 seeks to preserve.
- 7.51 The Landscape Strategy incorporates existing trees to the site boundaries and provides additional native structural tree planting to strengthen the landscape structure, reinforce the containment of the appeal site and distinction between the site and open, undeveloped land, whilst tying-in with the wooded backdrop and context provided by the woodland that bounds the former golf club.
- 7.52 The proposals also incorporate hedgerows, wildflower meadows and SuDS incorporating swales and a pond with marginal vegetation managed for biodiversity and wildlife. These features will add to the overall character, biodiversity and functionality of the local landscape.
- 7.53 The landscape proposals therefore offer benefit and enhancements to the local landscape, reflecting the guidelines and design cues for the Barnet Plateau Natural Landscape Area, including blocks of silver birch, hedgerows defining wildflower meadows within open space, wet ditches and shallow attenuation basins with wet grassland habitat, meandering lines of willow and planting of hornbeam and oak.
- 7.54 Given the above factors, I consider the appeal proposals to conform with Development Management Plan Policy DM1, Part B point e through the retention and enhancement of existing landscape, trees, and biodiversity.
- 7.55 The NPPF at paragraph 130c and Core Strategy Policy CS1.B require proposals to respond positively to the local context and reinforce the positive attributes of local distinctiveness. This has been achieved by the appeal scheme through the retention of existing woodland, trees and hedgerows and provision of new planting, landscape areas and habitats in line with guidance for the Barnet Plateau Natural Landscape Area, as set-out in the Natural Signatures: The London Landscape Framework.
- 7.56 I also consider the proposed development to accord with the requirements of Harrow Core Strategy Policy CS7A and Development Management Plan Policy DM6. The proposals have been demonstrated to respect and preserve the characteristics of the wider Area of Special Character identified as being of strategic value and their setting. The proposals also offer opportunities to retain and enhance characteristic woodland planting and features for biodiversity, including wildflower meadows and water features managed for wildlife.
- 7.57 The proposals would not adversely impact on the ridge and wooded backdrop or identified key views to or from the Harrow Weald Ridge Area of Special Character. As I have demonstrated within this proof of evidence, the appeal proposals preserve private views across the appeal site and golf course to the wooded backdrop and skyline at Stanmore Park and Pear Wood, whilst retaining and improving private views from the elevated land north of the driving range across the wider landscape and skyline of Harrow and Greater London to the south.

