

## Stanmore and Edgware Golf Centre

Summary of Proof of Evidence

Proof of Evidence of Ms Nicola Rankin

Appeal reference APP/M5450/W/22/3299650

September 2022

## **Qualifications and Experience**

My name is Nicola Rankin and I am a town planner, with over 15 years' experience in the public sector planning. I hold a Masters in Spatial Planning from the University of Oxford Brookes. I am an affiliate member of the Royal Town Planning Institute. The evidence that I provide is my true professional opinion.

## **Scope of my Proof of Evidence**

The scope of my evidence relates to the impact of the proposal on the openness of the Green Belt and consideration of the Very Special Circumstances case put forward by the appellant. My evidence also considers the residential amenity impact identified in reason for refusal 3 in relation to disturbance caused by vehicles on the roads surrounding the appeal site. I then provide evidence on other material considerations relevant to the appeal scheme and the 'planning balance'.

## **Application Site**

The appeal site relates to a former golf centre and driving range located on the west side of Brockley Hill.

The site relates to an irregular shaped plot of land located towards the centre of the wider site and contains the remains of the former golf building, a hard surfaced car park and an area of soft landscape directly in front of the former golf building which was previously used as a driving range. The overall site area is 1.63 hectares

The former golf club building on the application site has been subject to an extensive fire at the end of June 2020 which has destroyed much of the original building, leaving only part of the original frame and area of hardstanding in place.

The application site is situated within the Green Belt and is within the Harrow Weald Ridge Area of Special Character.

## **Green Belt Openness**

Reason for refusal one relates to the impact on the openness of the Green Belt. The appeal scheme would have a greater impact on the openness of the Green Belt compared to the existing site circumstances. As such, the development would

constitute inappropriate development in the Green Belt. Both the appellant and the Council agree that the development would constitute inappropriate development.

#### Proposed Development Compared to Existing Site

The appeal site itself comprises, tranquil Green Belt land which is comprised of open fields, surrounded by woodlands and mature vegetation. The predominant character of the area around the immediate site is green and open with the strong presence of mature trees and vegetation. These characteristics contribute positively to the visual amenity of the area.

It is accepted that the visual effects on openness would be limited to localised public vantage points along the eastern side of Brockley Hill, however the effects would be significant.

The impact on more localised views within the site would also have significant impacts on the visual openness of the Green Belt. The open nature of the existing structure on site blends into the landscape much more readily and is visually recessive. The visual impacts of the proposed building have not been provided as evidence (in a photomontage) to demonstrate the contrast that would arise from the proposal. Nonetheless, I am of the opinion that the solid scale and massing of the building would be highly visually apparent, and the proposal would constitute a visual encroachment on the Green Belt.

The proposal would also incorporate substantial areas of formal landscaping in front of the proposed building would increase the urban nature of the development as it would not reflect the natural qualities of the surrounding land. This element would further contribute to the reduction of the visual openness of the Green Belt.

#### Proposed Development compared to former building

The Council consider the correct approach is to consider the proposed development in relation to the existing site circumstances. Nevertheless, the impacts of the proposal in relation to the former building on site is also considered for completeness.

Both the former golf building and proposed building would be sited on previously developed land. However, the proposed building would have a greater footprint, floorspace and volume compared to the former building.

Although the proposed building will be laterally more compact as a result of the loss of the existing driving range bays, the appellant will introduce a large scale banqueting hall which will sprawl to a much greater extent further northward where currently there is no built development. I consider that the proposed building would be much more visually prominent than the former building, particularly as a result of the bulky banqueting hall, compared to the form of the previous building. Overall, in my view, it is clear that as a result of the overall increase in the footprint and volume of the building, which would introduce a bulkier element of built development in an area where currently there is none, combined with the formal landscaped area and staff car park, would result in greater spatial and visual impacts to the openness of the Green Belt when compared against the former building.

### Conclusion

There would be a substantial decrease in the spatial aspect of Green Belt openness compared to the remains of the open steel frame structure as well as a notable reduction to the visual openness of the Green Belt in localised views from Brockley Hill and from within the site. When these factors are taken together, the harm to the openness of the Green Belt would be substantial. Any harm to the Green Belt should be given substantial weight (NPPF Paragraph 148) and this include definitional harm from inappropriate development (NPPF Paragraph 147). The appellant has not demonstrated that there are 'Very Special Circumstances' where the harm to the openness of the Green Belt and any other harm would be outweighed by other material considerations.

### Very Special Circumstances

#### Need

There are in my view additional venues in Harrow and nearby areas to those which have been identified by the appellant that are currently not operating at capacity. I

consider the appellant has underplayed the significance of the wider area. I cannot conclude on the evidence that I have seen that existing venues are at saturation point. In my opinion, the proposal would increase choice in the market, but it is not meeting a need which cannot be currently met. Moreover, unmet need in my opinion does not clearly outweigh the harm that would be caused to the openness of the Green Belt and any other harm.

### Untidy Land

It is acknowledged that the site is currently in a derelict and dilapidated condition as a result of the fire and fly tipping on the land and graffiti on the buildings which occurred post fire. However, the Council could consider the use Section 215 of the Town and Country Planning Act to tidy up the site. Section 215 (s215) of the Town & Country Planning Act 1990 provides a local planning authority (LPA) with the power, in certain circumstances, to take steps requiring land to be cleaned up when its conditions adversely affects the amenity of the area. Given there are other mechanisms by which to remedy the situation on site, this element is given a limited amount of weight in the planning balance.

### Biodiversity

It is accepted that that the biodiversity proposals would be acceptable in relation to national, regional and local, policy (DM20 and DM21 of the Harrow Development Management Policies Local Plan), subject to securing appropriate planning conditions. The biodiversity benefits are considered to be positive but are given limited weight.

### Economic and Social Benefits

It is acknowledged that there will be some direct and indirect economic and social benefits from the supply chain, local expenditure and employment opportunities to which I attach moderate weight.

### Conclusion

In my professional opinion, the weight of other considerations in this instance would not be sufficient to clearly outweigh the substantial weight in relation to the harm to the

Green Belt in addition to any other harm that would arise. Consequently, the very special circumstances necessary to justify the development do not exist.

### **Residential Amenity**

Parking surveys undertaken by the Council demonstrate how little parking there is currently on the surrounding streets to the south east of the site. A substantial number of vehicles would still be looking to park in a limited number of residential streets. It is likely that people attending events would look to park as close to the venue as possible. However, when large events are held, there will be significant parking overspill which is likely to transform comings and goings and associated noise and disturbance in these very quiet suburban roads. In my view this will have an unacceptable impact on the residential amenities of the surrounding neighbouring occupiers. Residents would be highly sensitive to any degree of noise activity taking place, particularly during the evening and at night, given the quiet and calm nature of the existing streets.

### **Planning Balance**

It is recognised that the proposal would increase choice in social spaces for events for Asian and other ethnic communities to which I attach a moderate amount of weight. The overall proposed improvements to biodiversity will not be large and can therefore only be attributed a limited amount of weight.

There would be direct, indirect, more permanent economic benefits brought forward by the appeal scheme, to which I attach further moderate positive weight. I give limited weight to the short-term economic benefits that would arise during the build process

I have had due regard to the Public Sector Equality Duty contained in section 149 of the Equality Act 2010 which specifies the need to advance equality of opportunity and foster good relations between people who share a protected characteristic and people who do not share it. I have also had regard to the rights conveyed within the Human Rights Act 1998, which requires consideration to Human Rights and any protected characteristics.

## **Conclusion**

In my view, when the above considerations are taken together, the benefits do not outweigh the conflicts with the development plan arising from harm to the Green Belt, harm to the character and appearance of the locality, to the highway safety on Brockley Hill and also in relation to the harm to residential amenity on nearby residents.

In my professional opinion, the appeal development is in conflict with the National Planning Policy Framework (2021) (Paragraphs 110 (d) 111, 126, 130 (a), (b) and (c) 134, 149 (g), 150 (e), policies G2, D3 (1) (11) and (12) and T4 of the London Plan (2021), Policies CS1 F, CS1 B and CS 7A of the Harrow Core Strategy (2012) and policies DM 1 B (f) (c) and D(h), DM6, DM16 DM 42 E and F, and DM 43 B and C of the Harrow Development Management Policies Local Plan.

There are no material considerations of sufficient weight to indicate that planning permission should be granted. Accordingly, my evidence is that this appeal should be dismissed, and planning permission refused.