

Brockley Golf Course

Supplementary Openness and Landscape Appraisal
CLPD 036 R01c

September 2021

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1 Introduction and Background

Introduction

- 1.1 This Supplementary Openness and Landscape Appraisal has been produced by Cornus Landscape Planning and Design on behalf of Sairam (Holdings) Ltd. The report provides updated technical advice to support the planning application for the redevelopment of land located at the former Stanmore and Edgware Golf Club.
- 1.2 The redevelopment will involve the removal and demolition of the clubhouse and the construction of a new banqueting facility, widening of existing vehicular access from Brockley Hill, car and cycle parking, waste/recycling storage, landscape enhancements and associated works.
- 1.3 The report assesses the impacts on openness of the Green Belt based on the current situation of the site, and provides an overview and summary of the landscape and visual effects arising as a result of the proposed development which is provided in full within the LVA found at **Appendix 1**.
- 1.4 This report has been prepared by a Chartered Member of the Landscape Institute (CMLI) who has over 13 years of experience of working as a practising Landscape Architect and who is familiar with the project and its background.
- 1.5 Prior to the involvement in this stage of the project, the author was involved in the original reporting and production of the LVA and Green Belt Assessment work through Tyler Grange Group Limited.
- 1.6 This report has also been peer reviewed by another Chartered Landscape Architect and Director of Incola Landscape Planning Limited, Robert Hughes CMLI who has over 17 years experience as a practising Landscape Planner.

Methodology and Structure

- 1.7 The report does the following:
 1. Provides an introduction and background to the project;
 2. Provides an overview of the updated Landscape and Visual situation and context (with reference to the LVA found within the **Appendix 1**);
 3. Reviews the Regional, Local and National Planning Policy relevant to the openness of the Green Belt;
 4. Provides an overview of the existing site context;

5. Provides an overview of the proposals;
6. Compares the impacts on visual openness of the Green Belt of the existing situation and the proposed development; and
7. Summarises the findings of the assessment.

Background to Project

- 1.8 The planning application for the scheme was submitted in August 2020 to Harrow Council (application reference P/3088/20), following a collaborative and iterative process throughout 2020 with Harrow Council and the Greater London Authority. This process involved the following:
 - Pre-application meetings held on the 3rd March 2020, 17th March 2020, 4th June 2020 and 6th August 2020;
 - Design Review Panel Presentation 25th June 2020; and
 - GLA Panel Presentation 29th July 2020.
- 1.9 This Supplementary Openness and Landscape Appraisal provides an updated assessment of the site and builds on the work completed in 2020 by Tyler Grange Group Limited to support the original application.
- 1.10 It has been prepared following a request by members at the Harrow Planning Committee meeting on 30th June 2021, for the applicant to provide additional information, including an updated assessment of the site in its current situation with the fire damaged building in order for members to be able to assess the potential impact of the development on the openness on the Green Belt and to compare the existing situation with the proposed development.
- 1.11 The principal concern raised within the officer's committee report refers to the potential impact of the proposals on the openness of the Green Belt, considering the revised site context and fire damage. In particular the following comments were received in the officer's committee report:

- 1.12 At paragraph 6.2.27, it states:

"Based on site observations, as much of the external walls and roof have been destroyed and no longer exist, it is considered that the remaining structure on site is much reduced in terms of its scale and volume compared to the pre existing building figures cited in the above table. As such, it is considered that the proposed building would be much greater both volumetrically and in terms of its footprint and floorspace than the figures identified above. It would therefore

have a much greater impact on the openness on the Green Belt than the existing development. Since the application was submitted, the applicant has not provided any updated information in respect of the scale of the existing fire damaged structure which remains on site. It is therefore considered that the applicant has failed to demonstrate that the proposed development not have a greater impact on the openness of the Green Belt than the existing development."

- 1.13 The appraisal will address the revised site situation and consider how the proposed development will impact on the physical and visual openness of the Green Belt, as well as how the site may contribute to the Green Belt purposes and their function. It addresses the landscape and visual elements of the site specifically, and their impact on openness as well as assessing the wider impact of the proposals on the adjoining undeveloped Green Belt land.
- 1.14 The report should be read in conjunction with the following documents:
 - Landscape and Visual Appraisal - **Appendix 1 (CLPD-036-R02)**;
 - Proposed scheme layout. 5plus architects - **Appendix 4**;
 - Landscape Strategy Plan. Tyler Grange - **Appendix 5**;
 - Tyler Grange Landscape and Visual Appraisal (13201/R02e/RP/JJ/28th January 2021); and
 - 5Plus Design and Access Statement.



2 Overview of Landscape and Visual Appraisal

Introduction

- 2.1 The information included within the LVA (**Appendix 1**), provides an update to the Landscape and Visual Appraisal. The assessment has reviewed the current situation of the site, its landscape character and visual baseline, and how the revised situation and context impacts on the proposals and development of the site.
- 2.2 The updated LVA work has found that the development of the site will not be detrimental to the landscape character or visual amenity and that the proposed scheme can be assimilated into the landscape sensitively to respect the context of its surroundings.
- 2.3 The following provides an overview of the key findings of the Landscape and Visual Appraisal:

Landscape Character Assessment Overview

- 2.4 The assessment of landscape character and the updated 2021 assessment has found that site is in a declining and poor condition, with the derelict club house building, vandalism, and fly tipping being detracting features within the landscape.
- 2.5 The landscape is of **Low value, Low susceptibility** and **Low sensitivity** to development.
- 2.6 Overall, the redevelopment of the site will be consistent with the surrounding area, and will not be seen as an incongruous feature within the landscape. The site is not a tranquil or undeveloped landscape and its redevelopment will be entirely consistent with its current land use and character.
- 2.7 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 removal of detracting and poor quality features and characteristics. Retention of characteristic boundary planting will maintain the separation from the wider undeveloped landscape to the east and the residential development to the south.
- 2.8 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.
- 2.9 The northern part of the site which does not include areas of built form will benefit from the proposals, with the additional tree planting and landscape buffer integrating the building into the wider landscape. The proposed landscaped edge will also increase characteristic vegetation and add to the wooded and well treed landscape.

2.10 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.

Visual Context Overview

- 2.11 The updated assessment of the Visual Context which took place over the summer of 2021, found that the effects on visual amenity will be **localised** and **limited** to receptors of Brockley Hill located to the east of the site, with this being the only public view available.
- 2.12 The visual context of the site is also accepted by the officer's committee report at paragraph 6.2.29.
- 2.13 It is acknowledged that views of the site have been taken in summer months when trees are in full leaf, and that during winter months the visual context may differ. However, it is likely that due to the established and large areas of woodland found within the context of the site that views will still be limited and localised.
- 2.14 The redevelopment of the site will not impact on the key views identified within the Harrow and Weald Ridge Key Views document.
- 2.15 The proposed development can be accommodated into the landscape without being detrimental to the visual amenity of users of Brockley Hill, and will provide benefits to the visual amenity of these receptors.
- 2.16 The golf clubhouse will be replaced with a new sensitively designed building, with associated tree and hedgerow planting and retained landscape framework. Detracting features will be removed and replaced, and the proposed redevelopment of the site will not be seen as an incongruous feature within the landscape, with built form already a feature and the proposals enhancing the existing visual amenity.
- 2.17 The retention of the existing framework of landscape features and boundary vegetation will also be beneficial to the scheme and will maintain the enclosed and limited visibility of the site and the separation of the proposed redevelopment from the wider landscape.
- 2.18 The openness of the wider golf course is not experienced in public views and this contained nature is maintained in views from Brockley Hill, through the redevelopment of the site, with characteristic vegetation maintained, retaining the enclosed and contained character.
- 2.19 Any change to views will be seen in the context of a site which is already developed, but one which is degraded in character and condition. The site, if left in its current condition has the potential to decline over time

and further reduce the visual amenity of receptors.

Landscape Planning Policy Overview

2.20 A review of the current baseline situation and adopted policy was completed as part of the updated work within **Appendix 2 and 3**, and the proposals respond to the landscape planning policies through the following:

- Existing trees are retained and incorporated into the proposals with additional areas of tree planting. Where two trees are removed for arboricultural reasons, these have been replaced within the scheme (Policy G7 of the London Plan and Policy DM22 of the Harrow Core Strategy);
- The proposals reflect the local character and distinctiveness of the surrounding area (Policy D3 of the London Plan and Policy CS 1 of the Harrow Core Strategy);
- The proposals maintain the special character of the Stanmore & Harrow Weald and the proposed development is maintained below the skyline (Policy CS 7 of the Harrow Core Strategy);
- The proposals are not detrimental to the key views identified in the Harrow Views Assessment (Policy DM 3 of the Harrow Core Strategy); and
- The proposals include additional areas of Green Infrastructure (Policy G1 of the London Plan).

Interim Summary

2.21 In summary, the principles which have been established in the proposed landscape scheme have responded to the opportunities and constraints identified through the updated landscape and visual baseline work and the proposed scheme will provide a much improved situation in landscape and visual terms.

2.22 Comments which were specifically received on the landscape proposals in the officer's committee report were supportive of the proposed landscape scheme and the iterative and collaborative approach taken. In particular attention is drawn to paragraph 6.336 which states that:

"The applicant has sought to respond to comments and suggestions from the Independent Design Review Panel, particularly regarding maximising landscaping opportunities both to add richness and biodiversity to an already rich landscape but also to increase the experiential value of the wedding venue itself."

2.23 At paragraph 6.3.5 it states that:

"...Setting aside the issue of Green Belt openness, it is considered



2 Overview of Landscape and Visual Appraisal

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. Nevertheless, this does not negate concerns previously raised in respect of Green Belt openness."

2.24 At paragraph 6.6.4 , the officer's report states:

"The retention of the existing trees to the south of the secret garden area is supported. It is also positive to note all existing trees are to be retained and incorporated into the proposals, with the exception of the removal of 2 trees for arboricultural reasons"

2.25 The redevelopment of the site will improve visual amenity, replacing a degraded and dilapidated building with a new and sensitively designed scheme of high quality which responds to its surrounding context and setting, and is integrated into the landscape with characteristic features responding to the wider undeveloped land beyond the site boundaries.

2.26 The proposals will integrate the building into the open and undeveloped land to the north, and will reflect the adjacent wooded characteristics of Stanmore Country Park and the wider wooded character of the surrounding landscape, with native tree planting increasing Green Infrastructure links, enhancing the landscape character, increasing biodiversity and reflecting the characteristics of the 'Barnet Plateau' LCA.



3 Planning Policy

Planning Policy - National Planning Policy

3.1 At paragraph 137, the NPPF states the role of the Green Belt is as follows: *“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.*

3.2 The five aims and purposes of the Green Belt are to:

- a. To check the unrestricted sprawl of large built-up areas;
- b. To prevent neighbouring towns merging into one another;
- c. To assist in safeguarding the countryside from encroachment;
- d. To preserve the setting and special character of historic towns; and
- e. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

3.3 Green Belt is not a landscape designation and does not provide protection to attractive and/or valued landscapes. However, it does encourage the beneficial use of Green Belt once it is designated. At paragraph 145 it states that:

“Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”

3.4 At paragraph 147 of the NPPF, the following is stated with regards to inappropriate development in the Green Belt:

“Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”.

3.5 It goes on to say at paragraph 148 that:

When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

3.6 At paragraph 149, Chapter 13 of the NPPF, the following is stated with regards to development in the Green Belt.

“A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:

– not have a greater impact on the openness of the Green Belt than the existing development;”

Previously Developed Land and Openness of the Green Belt

3.7 The site lies on Previously Developed Land (PDL) which is defined within the glossary of the NPPF:

“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.”

3.8 The site is a developed site, whose red line boundary encompasses existing areas of development and hardstanding. The club house building does not blend into the landscape and due to its derelict condition is seen as a detracting feature within the site and the wider adjoining landscape.

National Planning Policy Guidance (NPPG)

Green Belt (Updated July 2019)

3.9 At paragraph 001 of the NPPG (Reference ID: 64-001-20190722), the following is stated with regards to development within the Green Belt:

“Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. 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 proposal may be relevant, as could its volume;

-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.”

Regional Planning Policy - The London Plan (2021)

3.10 The relevant policies within the adopted London Plan relating to development on Green Belt Land are the following:

Policy G2 London’s Green Belt

3.11 Policy G2 states:

“A The Green Belt should be protected from inappropriate development:

1) development proposals that would harm the Green Belt should be refused except where very special circumstances exist,

2) subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.”

Local Planning Policy - Harrow Council Development Management Policies (July 2013)

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

3.12 Policy DM 16 states that development on Previously Developed Land will be supported providing it does not have a greater impact on openness than the existing development present on site and states the following:

“A. The redevelopment or infilling of previously developed sites in the Green Belt and Metropolitan Open Land will be supported where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to:

a. the height of existing buildings on the site;

b. the proportion of the site that is already developed;

c. the footprint, distribution and character of existing buildings on the



3 Planning Policy

site; and

d. the relationship of the proposal with any development on the site that is to be retained.

3.13 In addition, it states that the proposed development will need to consider the visual amenity and character of Green Belt land within the redevelopment of Previously Developed Land:

"B. Proposals for the redevelopment or infilling of previously-developed sites in the Green Belt and Metropolitan Open Land will also be required to have regard to the visual amenity and character of the Green Belt and Metropolitan Open Land."

Policy DM 17: Beneficial Use of the Green Belt and Metropolitan Open Land

3.14 Policy DM 17 states that beneficial uses would be supported providing the use does not impact on the openness of the Green Belt and supports the use of Green Belt land for biodiversity enhancements, enhancing public access, and improving the quality of the environment within the Green Belt:

"A. Proposals for the beneficial use of land in the Green Belt and Metropolitan Open Land will be supported where the use would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it than the existing use, having regard to:

a. the visual amenity and character of the Green Belt and Metropolitan Open Land;

b. the potential for enhancing public access within the Green Belt and Metropolitan Open Land as part of Harrow's Green Grid;...

e. the contribution that the site and its surroundings make to the biodiversity (see policies DM20 and DM21); and

f. the desirability of improving the quality of the environment within the Green Belt and Metropolitan Open Land."



4 Existing Site Context

Contribution to the purposes

Purpose 1: To check the unrestricted sprawl of large built-up areas

4.1 The site is located to the north west of Stanmore (as illustrated on the **Green Belt Context Plan - CLPD 036 P07**) and is removed and separated from the urban edge by the presence of Cleopatra Close Park, hedging and vegetation, and the wider undeveloped golf course land to the south. There is no physical connection between the site and the built edge, with the site located approximately 232 metres to the north of development at Cleopatra Close and approximately 150 metres to the west of residential development off Grantham Close. In addition to this, there is no ribbon development located along Brockley Hill between the edge of Stanmore and the boundary of the site. This Green Belt purpose is therefore not relevant to the assessment.

Purpose 2: To prevent neighbouring towns merging into one another

4.2 The scale and location of the site does not serve to prevent neighbouring towns from merging. It is located approximately 1.7km from the town of Elstree to the north, and approximately 232metres from Stanmore to the south east. Given its scale and location it does not serve to prevent neighbouring towns from merging. As well as this, the presence of the M1 to the north east, and the well wooded and established landscape framework also prevent any merging of neighbouring towns. The site does not contribute to this purpose.

Purpose 3: To assist in safeguarding the countryside from encroachment

4.3 The majority of the site is previously developed land, and built form is already established on the site. Encroachment has already taken place within the site, with the derelict clubhouse, its structure and built form, along with netting, lighting and other urbanising factors already present. The boundary vegetation at the edges of the site running along Brockley Hill limits encroachment to the wider land to the east, and this vegetation is retained and incorporated into the proposals. The mature vegetation found within Stanmore Country Park to the west also safeguards the land from encroachment and prevents any further development to the west.

4.4 The presence of existing vegetation found on the southern boundary of the site as well as along Brockley Hill, and at the boundaries to the north and east will protect the site from further encroachment both physically and visually. In addition to this, Brockley Hill itself is a linear feature running across the landscape which limits encroachment to the east. In addition to the specific assessment made as part of this report, the officers report also states at paragraph 6.2.37 that:

"It also accepted that the building would be positioned on previously



4 Existing Site Context

developed land and so would not result in any encroachment of the countryside.”

- 4.5 The site is previously developed land and makes a limited contribution to this purpose.

Purpose 4: To preserve the setting and special character of historic towns

- 4.6 There are no listed buildings within the site, it does not fall within a conservation area or its setting, nor is it in close proximity to an historic town and therefore does not make any contribution to this purpose.

Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 4.7 The site comprises previously developed land and is derelict in nature. It therefore makes a more limited contribution than the undeveloped land within the Green Belt. The wider team has completed a sequential site assessment of nearby town centres, and concludes that there are no sequentially preferable sites that are available or suitable. The site makes a limited contribution to this purpose.

Interim Summary

- 4.8 Overall, the site makes no contribution to purposes 1, 2 and 4 and a limited contribution to purposes 3 and 5.



4 Existing Site Context

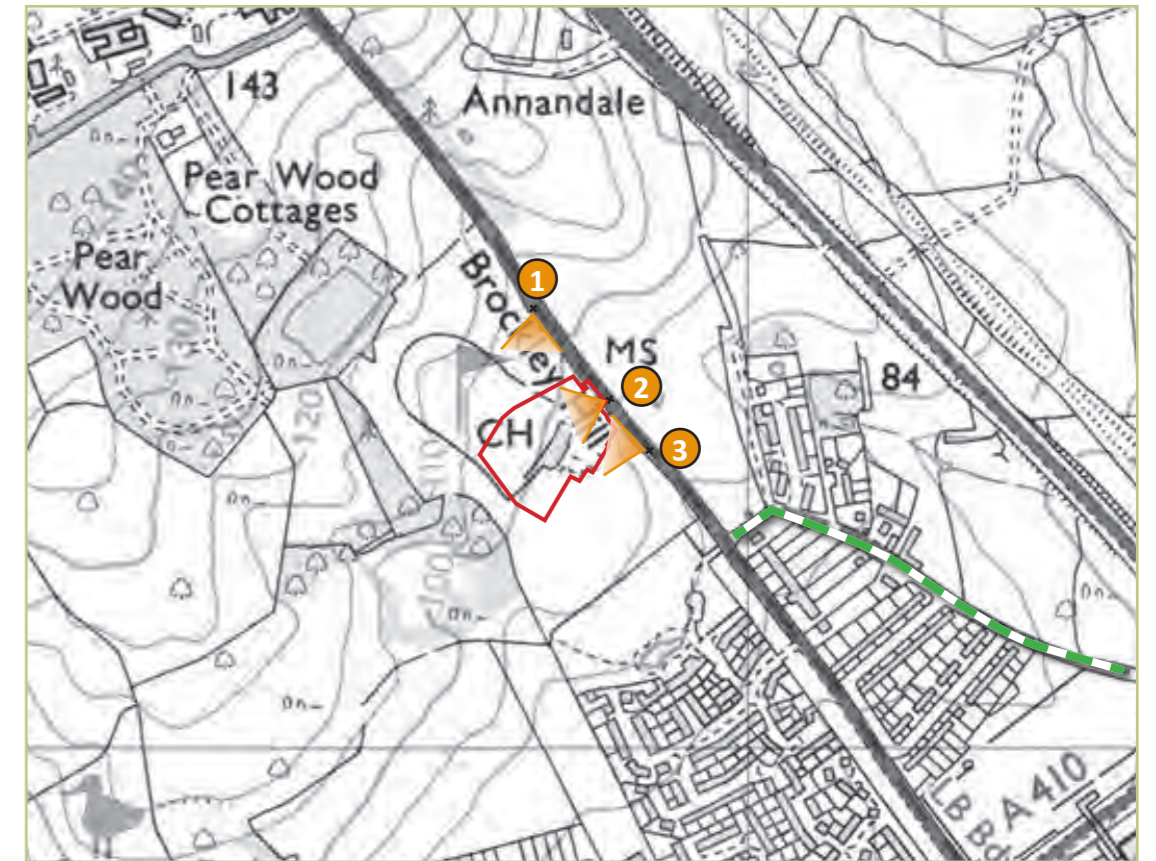
Visual Survey and Existing Context

4.9 The following **Photoviewpoints 1-3**, along with **Images G-P** and the **Green Belt Analysis Plan (CLPD 036 P08)** provide an overview of the existing site context from the updated photography gained during Summer 2021.

4.10 This visual record is used to inform the comparative assessment of the impacts on the openness of the Green Belt, between the current situation and the proposed development of the site.

4.11 This is separated out into three distinct sections:

1. Public views from Brockley Hill (**Photoviewpoints 1-3**);
2. Private long range views from the north and south outside of the application site (**Images O-P**); and
3. Immediate views within the application site (**Images G-N**).



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Description: View from Brockley Hill towards the site

Distance From Site: 70 m
Orientation: Southwest

TQ 17757 93535
Date/Time Taken: 27/07/2021 12:06

Photoviewpoint 1



4 Existing Site Context



Description: View from Brockley Hill looking towards the site entrance

Distance From Site: 0 m

TQ 17828 93433

Photoviewpoint 2

Orientation: West

Date/Time Taken: 27/07/2021 11:54



Description: View from Brockley Hill through gap in hedgerow

Distance From Site: 0 m

TQ 17841 93416

Photoviewpoint 3

Orientation: West

Date/Time Taken: 27/07/2021 12:01



4 Existing Site Context



Image G: Club house with extending, sprawling and linear 'wings'



Image H: Club house, with metal framework, brick walling, timber fencing, debris and graffiti



Image I: Areas of hardstanding adjacent to wings of club house



Image J: Areas of hardstanding in car parking



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Legend

Site Boundary A Image G-P

Plan Name	Green Belt Analysis
Plan Number	CLPD 020 P08
Revision	-
Date	31/08/2021

0m 30m 60m



4 Existing Site Context



Image K: Internal landscape features around club house and car park area



Image L: Boundary vegetation along southern edge of site



Image M: Boundary vegetation along Brockley Hill



Image N: Views from northern boundary



4 Existing Site Context



Image O: Views from higher areas in wider golf course



Image P: Views from higher areas in wider golf course

5 Proposals

Overview of Proposals

5.1 The proposals will include the following:

- Demolition of the golf clubhouse and replacement with Banqueting Hall facilities;
- Development which covers 1.63 hectares of land;
- New building located on the same location as the previous building found on site;
- Proposed building lower in height than the original building;
- Proposed increase in volume, footprint and floorspace over the club house building;
- Retention of existing car park;
- Vehicular and pedestrian access off Brockley Hill;
- Car parking and bicycle storage for guests and staff;
- Removal of 2 category C trees;
- SuDS;
- Mounding and landscaped edge; and
- Internal landscaping and integration with existing landscape features.

5.2 The proposed and existing building layout is illustrated on the attached **Figures 4, 5, 6 and 7**, and should be read in conjunction with the proposed Landscape Strategy Plan found at **Appendix 5** within the LVA. **Figures 6 and 7** are extracted from the Design and Access Statement prepared by 5plus architects.

5.3 In addition, the proposals are illustrated on the Accurate Verified Photomontage (AVR) of the view from Brockley Hill, produced by Tyler Grange in 2020 (plan reference 13201/P16c), which models the development at year 15, as found at **Appendix 6** and on **Figure 8**.



Figure 4: Location of existing club house and approximate location of proposed building



Figure 5: Approximate proposed site overlay



Figure 6: Proposed site plan overlay-Extracted from 5plus DAS Page 40



Figure 7: Proposed scheme site section - Extracted from 5plus DAS Page 49





Figure 8: Accurate Visual Representation (AVR) of view at entrance to site off Brockley Hill - Extracted from Tyler Grange (reference 13201 P/16c)

6 Comparison of Visual Openness of the Green Belt

Introduction

6.1 The assessment provides a comparison between the existing site context, and the proposed development with regards to the impacts on the openness of the Green Belt. It considers aspects of visual openness as recognised by paragraph 001 of the NPPG (Reference ID: 64-001-20190722).

6.2 This comparison is separated out into three distinct sections:

1. Public views from Brockley Hill (**Photoviewpoints 1-3**);
2. Private long range views from the north and south outside of the application site (**Images O-P**); and
3. Immediate views within the application site (**Images G-N**).

4. Reference is also made to the proposals and the information found within Figures 4-8 and the Landscape Strategy Plan (**Appendix 5**).

Public Views from Brockley Hill	
Existing (Photoviewpoints 1-3)	Proposed (Figures 4-8 and Landscape Strategy Plan found at Appendix 5)
<p>6.3 As identified within the Landscape and Visual Appraisal report, the visual impact from public views will be limited and localised, and the site is only seen in views from Brockley Hill to the east (Photoviewpoints 2 and 3).</p> <p>6.4 Where public views are possible from Brockley Hill, these are glimpsed and the structure of the club house can be seen along with the overall height, ridge and extent of the building located below the wooded skyline. The site is seen as one which is developed in its context.</p> <p>6.5 The deteriorating condition and metal framework can be seen within these views and its height and overall form has a physical presence which impacts on the visual openness of the previously developed land.</p> <p>6.6 The undeveloped open golf course is not seen from these limited public views, with the club house, car park and ancillary structures associated with previously developed land impacting on the openness of the wider undeveloped and open Green Belt within these views.</p>	<p>6.7 The proposed built form will be seen at the same location within the site in public views from Brockley Hill as the existing club house. The composition of these glimpsed views will be very similar to the existing situation (Figure 8), with its developed nature and associated elements remaining within these public views.</p> <p>6.8 The proposals will improve the public views from Brockley Hill, with detracting features such as lighting columns and netting removed, the vandalised and poor condition club house replaced with a building of high quality and of a lower height which will be retained below the tree line and seen against the existing wooded backdrop.</p> <p>6.9 Existing boundary vegetation along Brockley Hill which limits the wider views of the open and undeveloped golf course is retained, and additional characteristic planting is proposed within the site (Appendix 5).</p>
Overall Comparison of Impacts on Openness	
<p>6.10 Prior to the fire, the building which is located on the same location as the proposed development impacted on the visual openness of the Green Belt. The club house, its deteriorating condition, and views of the metal framework, associated lighting columns and ancillary structures set the existing site within a developed context and are detrimental to the visual openness of the Green Belt.</p> <p>6.11 The visual openness in public views will not significantly change as a result of the proposed development, although the condition and quality of the built form will be enhanced within these views. The proposals will be of a lower height and a more compact design, with the extents of the proposed development sited on the existing location of built form. The composition of the view will be very similar to the existing situation, and the site will be seen in a developed context.</p> <p>6.12 On balance, there will be no greater harm to the visual openness of the Green Belt as a result of the proposed development from public views from Brockley Hill.</p>	



6 Comparison of Visual Openness of the Green Belt

Private long range views from the north and south outside of the application site	
Existing (Images O and P)	Proposed (Figures 4-8 and Landscape Strategy Plan found at Appendix 5)
<p>6.13 Within the adjacent golf course and from the higher private land to north, the golf course is open and undeveloped in its nature. Within these elevated views, the club house 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 (Image O and P).</p> <p>6.14 It is still perceived as a built and developed form within the landscape, and its deteriorating condition means it is not assimilated or blended into its surroundings.</p> <p>6.15 Prior to the fire damage, the officer's committee report acknowledges this, stating the following at paragraph 6.2.31 with regards to visual openness:</p> <p><i>"The LVIA demonstrates that pre-existing building is clearly visible and prominent from more localised views within site and inside the existing mature tree line. There are clear views from both the northern former golf course area and in some views from the green space to the south, noting there is an existing line of trees to the south. 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. Moreover, the report also notes that walling and timber fencing around the former existing club house all contributed to the developed nature of the southern part of the site and reduced the sense of openness of the site."</i></p> <p>6.16 The 'wings' of the club house are still largely intact, with the metal framing and rooflines extending beyond the main body of the club house and visible from the higher slopes of the golf course. These extending 'wings' are also visible from the undeveloped land to the south between the application site boundary and Cleopatra Close Park (Image P).</p> <p>6.17 Within the adjacent land outside of the red line boundary, the wider undeveloped golf course exhibits characteristics which serve to retain the openness of the Green Belt. The wider golf course land, as it rises to the north does not contain built form, and remains an area of open green space. In addition to this, the land to the south of the site is also undeveloped, and adjoins Cleopatra Close Park. This area provides a green buffer between the built edge of Stanmore and the boundary of the site and retains the openness of the Green Belt.</p>	<p>6.18 The proposed building will be maintained at the same location as the existing central part of the club house, against the backdrop of retained trees at the southern edge of the site (Image L and N).</p> <p>6.19 Within these views, the existing visually detracting and deteriorating club house will be replaced with a more compact and high quality building. The proposals will remove the sprawling 'wings' associated with the current club house which will improve the visual openness within these wider private views (Figure 5).</p> <p>6.20 The removal of the extending 'wing' structures from the open and undeveloped areas to the west, will retain the proposed redeveloped form behind the existing areas of mature trees to the south and reduce the impacts on visual openness when seen from the longer range elevated views (Figure 4).</p> <p>6.21 The development of the site will retain the openness of the undeveloped Green Belt, and the area to the north and south outside of the red line boundary will remain open (Figure 4).</p> <p>6.22 The proposed Landscape Strategy (Appendix 5), and the illustrative section at Figure 7, illustrate that a landscaped bund is proposed along the northern boundary of the site. This planted bund will integrate the proposals into the wider landscape and provide a continuation of the vegetated backdrop seen at the southern edge of the site. It will provide a soft edge to the new building, and assimilate it into the wider undeveloped adjoining land, therefore retaining the open and undeveloped land in the wider Green Belt.</p>
<p>Overall Comparison of Impacts on Openness</p> <p>6.23 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 private 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.</p> <p>6.24 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.</p> <p>6.25 On balance, there will be no greater harm to the visual openness of the Green Belt as a result of the proposed development, from private long range views from the north and south outside of the application site.</p>	



6 Comparison of Visual Openness of the Green Belt

Immediate views within the application site	
Existing (Images G-N)	Proposed (Figures 4-8 and Landscape Strategy Plan found at Appendix 5)
<p>6.26 The built form comprises walling, timber fencing, areas of hardstanding and the metal framework of the clubhouse building, (Images G-J). The site has a developed context.</p> <p>6.27 It is acknowledged that the club house has lost areas of walling and internal structure as a result of the fire damage, in particular the areas of walling found on the higher sections of the building. However, where these elements are no longer present, the metal framework retains the height, form and structure of the building. (Image H and N). 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 prominent within the site (Image G and H). The built form is not assimilated or blended into the landscape and is derelict and deteriorating in condition.</p> <p>6.28 The varying height and extending 'wings' of the clubhouse are still visible (Image G), extending and sprawling in a linear way from the main body of the building into the east and west.</p> <p>6.29 Areas of hardstanding are present within the site which are in a poor condition with self set weeds and damage. These areas of hardstanding are mostly found to the south of the clubhouse and adjoin the existing access point off Brockley Hill to the east (Images I, J and K). These areas of hardstanding further set the site within a developed context.</p> <p>6.30 From within the site the physical presence of the buildings continues to limit the visual openness. In addition, the presence of trees and vegetation at the southern edge of the site limits the perceived visual openness of the wider land to the south (Image L).</p>	<p>6.31 The immediate views from within the site will remain of a developed context, with the new building located at the same location as the original clubhouse (Figure 5).</p> <p>6.32 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 (Figure 5 and 6).</p> <p>6.33 The proposed building will be lower in height than the existing club house as illustrated on Figure 4. The proposed building will remain below the skyline, and below the existing trees found along the southern boundary. This retained vegetation maintains the separation with the open undeveloped land to the south.</p> <p>6.34 The areas of hardstanding are retained and incorporated into the proposals within the developed nature of the site.</p> <p>6.35 The visually detracting and deteriorating condition of the club house will be replaced with a building which will be of a high design quality, with the materials reflecting the surrounding context.</p> <p>6.36 Existing vegetation within the site boundaries is incorporated into the proposals, with additional areas of landscaping proposed to separate the site from the wider undeveloped Green Belt Land to the north (Appendix 5), and its openness maintained.</p>
Overall Comparison	
<p>6.37 The existing situation illustrates that the fire damaged club house, its developed context, footprint, height and declining condition are detrimental to the visual openness of the Green Belt within the immediate views of the site. The club house is a visually prominent structure in a deteriorating condition.</p> <p>6.38 Although the proposed development will increase in volume, the scheme will result in a more compact, lower height building which will be of a higher quality and condition and placed on the same location as the existing club house.</p> <p>6.39 On balance, there will be no greater harm to the visual openness of the Green Belt as a result of the proposed development from immediate views within the application site.</p>	



7 Conclusion

7.1 This supplementary Landscape and Openness Appraisal, has considered the redevelopment of the site in relation to its impact on openness, the contribution it makes to the five purposes of the Green Belt, as set out within the NPPF, and has also provided an update to the landscape and visual baseline work.

Updated Landscape and Visual Assessment

7.2 The updated assessment work has confirmed that the proposals are acceptable in landscape and visual terms, and can be assimilated into the surrounding landscape.

7.3 The proposals will see the condition and character of the landscape improved, and a degraded previously developed piece of land enhanced to respond to the surrounding context and character, providing additional benefits to landscape character, visual amenity and biodiversity.

7.4 The proposals respond to the surrounding landscape context and character and will not affect the special character of the Harrow Weald Ridge Area of Special Character.

7.5 Public views are limited and localised to users of Brockley Hill and the proposals will improve visual amenity through the replacement of the club house building, and removal of detracting features with a well designed, quality scheme.

7.6 Putting aside the Green Belt context, it is acknowledged that the officer's comments received in 2021 broadly support the scheme in terms of its landscape and visual context and that it complies with the adopted local planning policy within the London Plan (2021) and the Harrow Council Core Strategy.

Contribution to Purpose 3

7.7 The site does not contribute to purposes 1, 2, or 4, and makes a limited contribution to purposes 3 and 5. It makes a limited contribution to purpose 3 for the following reasons, as also identified in the response from the officer's committee report:

- The redevelopment of the site is on land which is already developed;
- The proposals are retained on the existing footprints within the site and are more centralised and less sprawling;
- The retention of the boundary vegetation along Brockley Hill, along with vegetation found at the southern boundary will reduce any encroachment and maintain separation;
- The provision of a new planted bund with native and characteristic trees to the north of the building will serve to further screen the site from the undeveloped landscape to the north, limiting the potential for encroachment; and
- The location of the site also separates it from the existing built

edge of Stanmore to the south, and its development will not result in encroachment into the countryside.

7.8 The site makes a limited contribution to purpose 5 for the following reasons:

- The site comprises previously developed land and is derelict in nature, making a more limited contribution than the undeveloped land within the Green Belt; and
- A sequential site assessment completed by the wider team of nearby town centres, concluded that there are no sequentially preferable sites available or suitable.

Comparative Assessment of Openness

7.9 The comparative assessment of openness has found the following with regard to the proposed development of the site:

Views from Brockley Hill

7.10 The proposals will improve the public views from Brockley Hill, with detracting features such as lighting columns and netting removed and the vandalised and poor condition club house replaced with a building of high quality, located below the tree line against the existing wooded backdrop.

7.11 The visual openness from public views will not perceptually change as a result of the proposed development, and the composition of the view will be very similar to the existing situation. The proposals are sited on the same location as the existing club house in an already developed context, and will be of a lower height.

7.12 On balance, **there will be no greater harm to the visual openness of the Green Belt** as a result of the proposed development from public views from Brockley Hill.

Private long range views from the north and south outside of the application site.

7.13 The wider golf course is physically and visually open and the development of the site will assist in retaining these characteristics and maintaining this visual openness. The proposals will retain development within the extents of existing built form, in a more compact and less sprawling form.

7.14 When viewed from the northern and elevated parts of the wider golf course, the proposed landscaping will filter and screen views of the proposals and will retain the visual openness of the wider undeveloped land.

7.15 On balance, **there will be no greater harm to the visual openness of**

the Green Belt as a result of the proposed development, from private long range views from the north and south outside of the application site.

Immediate views within the application site

7.16 The club house is retained in the same location as the existing built form, and its condition and quality enhanced. The existing developed nature of the site, with areas of hardstanding, and the detracting and deteriorating condition of the club house which is sprawling in its form, will be replaced with a more compact building.

7.17 Having a more condensed footprint, retaining development within a central location, along with the removal of the wings, will result in a greater degree of visual openness as perceived within the site.

7.18 On balance, **there will be no greater harm to the visual openness of the Green Belt** as a result of the proposed development from immediate views within the application site.

Beneficial use of the Green Belt

7.19 The proposed development includes additional proposals to the land around the curtilage of the redeveloped site, which will provide benefits to the wider Green Belt land. As stated in the overview of planning policy, paragraph 145 of the NPPF, Policy G2 of the London Plan (2021) and Policy DM17 of the Harrow Core Strategy (2012) state that beneficial uses of the Green Belt can encompass enhancements to biodiversity, visual amenity, character and the quality of the environment.

7.20 The proposed scheme includes enhancements which will increase the biodiversity potential of the site with a net gain in biodiversity through the creation of additional areas of tree planting, native hedging, areas of wildflower meadow and SuDS and living wall. The new proposals will also improve the existing quality and situation of the current site.

7.21 As identified within the Landscape and Visual appraisal work, the redevelopment of the site will not only renew a degrading and derelict site, but will enhance the character, provide a high quality building which respects its surroundings, provide biodiversity enhancements and improve visual amenity. The wider open and undeveloped Green Belt land to the north will maintain its openness.

7.22 Overall, on balance, there will be no greater harm to the visual openness of the Green Belt as a result of the proposed development.



Appendix 4 - Site Proposals (5plus architects)



Figure 2: Extract from Proposed Site Plan - 5plus Architects. Drawing Reference MP_OC_0300 Rev 04.

Appendix 5 - Landscape Strategy Plan (Tyler Grange)



Figure 3: Tyler Grange Landscape Strategy Plan (Plan reference 13201/P01d)



Photoviewpoint 1 (proposed view at implementation - Year 15)