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1 Executive Summary

This report has been prepared by Tyler Grange on behalf of Sairam (Holdings) Ltd to appraise the landscape and visual effects associated with the proposed demolition of existing golf club buildings (Use Class D2) and construction of a new banqueting facility (Use Class D2), widening of existing vehicular access, car and cycle parking, waste / recycling storage, landscape enhancements and associated works at the Stanmore and Edgware Golf Centre.

The proposals comprise the redevelopment of the existing club house and area of hardstanding and will result in development being almost entirely on the same footprint of the existing building. Existing car parking and the access into the site is retained and incorporated into the proposals and the scheme proposes to locate the new banqueting facility on the lower slopes in the same location as the existing built form.

Ongoing consultation and pre application advice has been sought through the development of the proposals, and an iterative approach has been taken to the development of the scheme.

The site is located on the northern outskirts of Stanmore. The presence of an existing golf club house, areas of hardstanding, car parking, netting, fencing and lighting associated with the golf course are detracting features within the landscape, and give the site peri-urban characteristics, and a settled context.

The site is located within the Green Belt and is within the 'Barnet Plateau' Natural Landscape Area as identified in the London's Natural Signatures: The London Landscape Framework.

The wider golf course north of the site shares some characteristics with the published landscape character assessment, with mature tree planting a common feature along the boundaries and long ranging views across to the south from the upper slopes of the golf course.

The extent of views into the site is limited and localised, with the only available views from Brockley Hill to the east of the site. The presence of built form located in the wider landscape limits visibility and the presence of mature tree planting found across the boundaries of the wider golf course reduces visibility and provides the site with a well contained and enclosed character, separating it from the wider landscape.

The development proposals have responded to the landscape character and visual amenity through the following:

- Retention of boundary planting along Brockley Hill to ensure views from the wider land to the east are filtered;
- -Proposed additional tree planting across the southern boundary of the site, to provide additional green infrastructure links and provide additional tree planting characteristic of the published LCA;
- -Existing lighting and netting removed and existing bunkers filled in and utilised for ecological enhancements;
- -Proposed SuDS pond along the southern boundary of the site, utilising the existing drainage ditch;
- -Tree planting avoided along eastern part of the site where constraints associated with Roman road are present;
- -Retention of existing internal tree planting found within car park to soften the building and filter views;
- -Proposed footpath link off Brockley Hill, utilising existing gap in tree planting to increase pedestrrian access into the site;
- -Proposed mounding to the north west of the development will integrate the building into the landscape and improve the existing situation. Proposed tree planting will not only increse characteristic landscape features but will limit the impacts on the openness of the Green Belt;
- -Retention of the building on the existing footprint and hardstanding;
- -Proposed ecological enhancements including management of retained hedgerows, the establishment of new meadow flower grassland, tree, hedgerow and scrub planting on-site, wetland habitat creation, bat and bird box implementation and associated sensitive lighting with opportunities for creating new hibernacular piles for reptiles.

The proposals comply with the following policies of the adopted Harrow Core Strategy:

- -Policy CS 1: Overarching Policy
- -Policy CS 7: Stanmore & Harrow Weald
- -Policy DM1: Achieving a High Standard of Development
- -Policy DM2: Achieving Lifetime Neighbourhoods
- -Policy DM3: Protected Views and Vistas
- -Policy DM6: Areas of Special Character
- -Policy DM12: Sustainable Design and Layout
- -Policy DM16: Maintaining the Openness of the Green Belt; and Metropolitan Open Land
- -Policy DM17: Beneficial Use of the Green Belt and Metropolitan Open Land
- -Policy DM22: Trees and Landscaping

Effects on the landscape character are negligible, with all existing landscape features retained and the proposed building retained on the existing footprint within proposals to include additional tree planting, ecological enhancements, SuDS, wildflower meadow planting and proposed landscaping to soften the building and provide benefits to biodiversity and amenity.

It has been established that whilst the site is within the Green Belt, that the impacts on openness are negligible, with no more impact than the existing situation already occurring on the site. In addition the proposals provide additional benefits for land within the Green Belt, with enhancements to ecology and amenity, and additional characteristic landscape features as well as a more sensitive proposals and design response for the proposed building.

Overall the development of the land at Brockley Hill will not cause undue harm to the landscape character and visual amenity, and will not be detrimental to the openness of the Green Belt.





1 Introduction and Site Context

Background

- 1.1 Tyler Grange have been appointed by HGH Consulting on behalf of Sairam (Holdings) Ltd to provide supporting technical landscape advice for the development of land at Brockley Hill Golf Club, Stanmore.
- 1.2 The proposed development is for the demolition of existing golf club buildings (Use Class D2) and construction of a new banqueting facility (Use Class D2), widening of existing vehicular access from Brockley Hill, car and cycle parking, waste / recycling storage, landscape enhancements and associated works
- 1.3 The scheme has developed through a iterative process and ongoing consultation with the Harrow Borough Council and the Greater London Authority and the following has taken place:
 - 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.

Site Context

- 1.4 The site is located on the disused Brockley Golf Course on Green Belt land which is within the London Borough of Harrow.
- 1.5 To the north is Pear Wood and beyond this the Royal National Orthopedic Hospital and the M1 motorway. To the east of the site is open land sandwiched between Brockley Hill (A5) and the Edgware Road (A41). Beyond this is open land near Edgware Bury and the northern residential edge of Edgware. To the west is Stanmore Country Park Nature Reserve, a well wooded landscape with recreational footpaths and the western edge of the residential edge of Stanmore. To the south is Cleopatra Close Park, and beyond this the existing residential edge of Stanmore.
- 1.6 Brockley Golf Course itself which contains the site slopes gradually from north to south from approximately 115m AOD to 100m AOD.
- 1.7 At the time of writing this report the site comprised an existing club house building, which has subsequently been subject to a serious fire and the majority of the building has been destroyed. For the purposes of this report the initial; baseline assessment is based on the site with the inclusion of the building, however the majority of the building now no longer exists.

Plan 1: Site Location (13201/P02a)





1 Introduction and Site Context

Methodology

- 1.8 This report has been undertaken in accordance with the following guidance (with further details found in **Appendix 1**):
 - An Approach to Landscape Character Assessment, Natural England, 2014; and
 - Guidelines for Landscape and Visual Impact Assessment (GLVIA), Third Edition, Landscape Institute and IEMA, 2013.
- 1.9 This is a standalone report and does not constitute a landscape chapter in the context of an Environmental Statement (ES) required by an Environmental Impact Assessment (EIA).
- 1.10 Table 3.1 of the GLVIA3 outlines what is required in this type of appraisal report, as a project outside of an EIA. This includes the following:
 - Establish the existing nature of the landscape and visual environment in the study area;
 - Provides a description of the proposed development, identifying the main features of the proposals and the changes that will occur; and
 - Systematically identifies and describes the effects that are likely to occur, including whether they are adverse or beneficial.
- 1.11 The approach taken in the preparation of this report is considered to be appropriate and proportional in the context of the professional guidance published by the Landscape Institute.
- 1.12 Professional judgement plays an important role in the landscape and visual analysis process where the analysis of landscape character and visual amenity is both a subjective and objective process. However, the analysis process seeks to provide a narrative to explain the judgement reached.
- 1.13 The study area for this LVA has been defined through fieldwork, GIS analysis and ZTV mapping, and includes those viewpoints from which the site and the development proposed would be visible.
- 1.14 Further explanation of the methodology applied to the Green Belt Assessment is detailed in **Section 7** to the rear of this report.



2 Policy Context

National Planning Policy Framework 2019 (NPPF)

- 2.1 Full details of the National Planning Policy can be found in **Appendix 2** at the rear of this report.
- 2.2 At the heart of the NPPF is a presumption in favour of sustainable development. For plan making the presumption requires plans to positively seek opportunities to meet the development needs of an area and be sufficiently flexible to adapt to rapid change. Footnote 6 identifies protected areas or assets of particular importance. Of relevance, the site is located within the Green Belt.
- 2.3 Of particular relevance to matters relating to Green Belt, Paragraph 145 states that exceptions to new building within the Green Belt include:
 - "c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
 - d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;"
- 2.4 It goes on to state that:
 - "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; or
 - not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority."
- **2.5 Section 7** of this report will provide further details of the development and it's impact on openness within the Green Belt.

National Planning Practice Guidance (July 2019 Update)

2.6 Of particular relevance, the July 2019 update to the Planning Practice Guidance (PPG) provides additional information on the role of the Green Belt in the planning system to supplement Section 13 of the NPPF. It identifies three changes;

Change 1: What factors can be taken into account when considering the potential impact of development on the openness of the Green Belt?

2.7 The revised PPG provides clarity with regard to the type of factors that need to be considered when a judgement is made with the impact of a proposal on the openness of Green Belt. The factors have been identified through case law and comprise the spatial and visual aspects of openness, the duration and the remediability of the development and the impacts of any associated activity such as traffic generation. (Paragraph: 001 Reference ID: 64-001-20190722).

Local Planning Policy Context

- 2.8 The site lies within the administrative area of Harrow District Council. The Harrow Core Strategy (February 2012) and Development Management Policies DPD are the key Local Development Framework (LDF) document providing the vision and spatial strategy for the borough.
- 2.9 The planning policies of relevance to landscape and visual issues are as follows together with details of additional, relevant documents comprising the LDF.

Harrow Core Strategy (February 2012)

2.10 The document provides all except one of the Core Policies as a suite of spatial policies relating to sub-areas of the borough. The site is located within policy sub area 'Stanmore and Harrow Weald'.

Core Policy CS 1: Overarching Policy

2.11 This policy provides overarching principles to manage development and these include local character, open space, responding to climate change and sustainable flood risk management applicable across the sub-areas.

Core Policy CS 7: Stanmore & Harrow Weald

2.12 Of particular relevance, this policy notes that development will be required to maintain the special character and identified views of Harrow Weald Ridge.

Development Management Policies (July 2013)

2.13 The policies within this document support proposals that contribute to sustainable development. Policies relevant to landscape and visual issues are detailed below.

Policy DM1: Achieving a High Standard of Development

2.14 A high standard of design and layout is expected from proposals that are not detrimental to local character and appearance. Consideration should include massing, bulk, scale and height of proposed buildings in relation to the location and surroundings. In addition landscaping proposals retain and enhance existing habitats wherever possible and be appropriate.

Policy DM2: Achieving Lifetime Neighbourhoods

2.15 Of relevance, this policy notes that proposals should improve the public realm by strengthening green infrastructure and facilitating pedestrian and cyclist permeability.

Policy DM3: Protected Views and Vistas

2.16 The site is not identified as containing a protected view of forming part of a protected view.

Policy DM6: Areas of Special Character

- 2.17 The site is located in the Harrow Weald Ridge 'Area of Special Character. This area of higher ground contributes to creating an elevated horizon of tree cover and open countryside important as 'a visual reminder that Harrow is an outer-London borough, a transition between the highly urbanised characteristics of central & inner London and the more rural character of the counties beyond.' The strategic importance of Harrow Weald Ridge is reflected in its designation as an Area of Special Character. This designation 'originates in the Greater London Development Plan of the 1970/80s the Plan's identified policy objectives were to 'safeguard scale, character and tradition' and 'protection of skyline'. For Totteridge/Harrow Weald, the objectives (shared with other areas) were to 'safeguard the individual quality and character of each of these extensive areas of open land and their architectural and historic features; protection of skylines and views; appreciation of recreational opportunities'.
- 2.18 The Harrow Weald Ridge 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'.

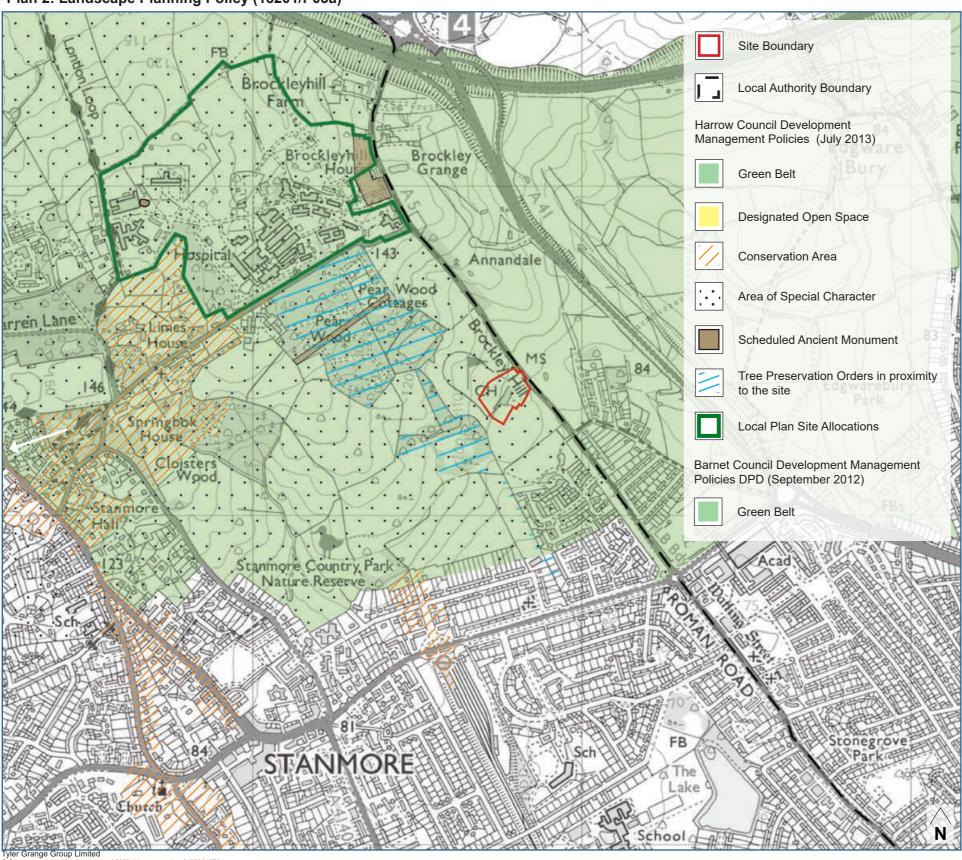
Policy DM12: Sustainable Design and Layout

2.19 The design and layout will be required to take into consideration landscaping to address a range of sustainability issues including nature, drainage and urban heating. A landscape-led design is



2 Policy Context

Plan 2: Landscape Planning Policy (13201/P03a)



recommended for the development of the proposals.

Policy DM16: Maintaining the Openness of the Green Belt and Metropolitan Open Land

- 2.20 The site falls within the Green Belt, and the proposal will be required to 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.
- 2.21 Considerations should include height, footprint and character of the existing buildings. The proposal will also need to consider visual amenity and character of the Green Belt and Metropolitan Open Land.

Policy DM17: Beneficial Use of the Green Belt and Metropolitan Open Land

- 2.22 The proposal will be required to 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.
- 2.23 Considerations should include visual amenity and character, the potential for enhancing public access and the desirability of improving the environment.
- 2.24 The scheme is seeking to retain the site within the Green Belt but will enhance the Green Belt Land by new planting and biodiversity benefitc.

Policy DM22: Trees and Landscaping

2.25 Development proposals will be required to include hard and soft landscaping that is appropriate to the character of the area, and will be required to achieve a suitable visual setting for the building(s) and provides sufficient space for growing trees. The loss of trees is discouraged in any development.

Harrow Views Assessment (July, 2012)

- 2.26 This document reviews views, landmarks and vistas identified in the now superseded UDP (2004) and provided robust justification for the removal/retention of these and the inclusion of new views and vistas. The development of the site will retain all existing trees.
- 2.27 The site is not covered by any of the identified views although it is worth noting that views of Harrow Weald Ridge comprise



2 Policy Context

- at least 6 of the identified views to be protected and that views towards Harrow Weald Ridge are therefore a key consideration. The identified view from Wood Farm to the north west of the site has been assessed as part of the visual study within this report.
- 2.28 It states that 'no new structures should be permitted which would breach the current skyline formed by St Mary's and Harrow on the Hill'.
- 2.29 The proposals do not result in any skyline punctuation which would impact on this view.

The London Plan (March 2016)

2.30 The London Plan forms part of the statutory development plan for Harrow. The London Plan includes development management provisions which will be applied by the Council in its consideration of development proposals in the Borough. Policies of particular relevance to landscape and visual issues are detailed below.

Policy 7.4: Local Character

2.31 Proposals will be required to have regard to the character of the area around the development and should improve an areas visual or physical connection with its natural features amongst other aims.

Policy 7.16: Green Belt

2.32 This proposal encourages the protection of the Green Belt from inappropriate development.

Policy 7.21: Trees and Woodland

2.33 This policy encourages the protection, retention and enhancement of trees and woodland in accordance with the guidance of the London Tree and Woodland Framework.

Tree Preservation Orders (TPOs)

- 2.34 There are no TPOs within the site boundary however there are two TPO Groups located immediately adjacent to the ownership boundary. These are:
 - TPO Group W3 located to the west of the ownership boundary within Stanmore Country Park
 - TPO Group W2 which covers Pear Wood located to the

north-west of the ownership boundary.

2.35 All trees within the site are being retained and therefore the existing TPO trees will not be impacted by the development of the site.

Public Rights of Way

2.36 There are no Public Rights of Way that pass through the site or that connect with the either site boundary or wider ownership boundary. A Regional Walking Route passes through Stanmore Country Park to the west of the site.

Designations

- 2.37 The site is covered by the following designations of landscape relevance:
 - 'Area of Special Character' within the Local Plan.
 - Green Belt
- 2.38 Stanmore Country Park is located 0.1km to the west of the site boundary, and much of this is identified as an ancient woodland. Stanmore Common is located 1.16km to the west of the site and this is Open Access Land.

Planning Policy Conclusion

Development should meet the following adopted policies found within the Harrow Local Plan.

- The proposals should retain all existing tree planting and incorporate this into the scheme (Policy DM22);
- Proposals should not be detrimental to the openness of the Green Belt and should provide additional benefits (Policy DM16 and DM17);
- Proposals should respect the qualities of the Area of Special Character, through retention of tree planting, retention of development below the skyline and protection of key views (Policy DM6); and
- The proposals should not be detrimental to the key views identified within the Harrow Key Views Assessment.

Development should also meet the following adopted policies found within the adopted London Plan (2016)

- Development should respect the local character and published character assessment (Policy 7.4);
- Should protect the Green Belt from inappropriate development (Policy 7.16); and
- Should protect, retain and enhance existing tree cover with areas of new tree planting proposed. (Policy 7.21).



Purpose of the Landscape and Visual Baseline

- 3.1 The landscape and visual baseline describes the site specific landscape character and sets this in the context of the published landscape character assessments and the landscape planning context
- 3.2 This forms the baseline against which the proposals and their potential impacts, in both landscape and visual terms are considered. Further consideration to PDL of Green Belt land is considered at **Section 7** of this report, and the review found within this section is purely from a landscape character and visual amenity point of view.

Landscape Character

- 3.3 The characterisation process is a non-value judgement process; therefore, classifying landscapes into distinct areas does not suggest that one character area is more sensitive than another or valued by people more or less.
- 3.4 The landscape character appraisal process explores detailed character features and site specific characteristics identified through fieldwork completed by Tyler Grange in May 2020, and reviews the published Landscape Character Assessment at a regional level that informs local distinctiveness and sense of place.
- 3.5 It should be noted that the assessment of the site was carried out prior to the fire which impacted on the club house.
- 3.6 This baseline information will enable the identification of the relevant characteristics, site features worthy of retention and will also identify detracting features which will need to be addressed within the proposals.
- 3.7 The adjacent **Plan 3** and corresponding images provide an overview of the site specific character across the site.

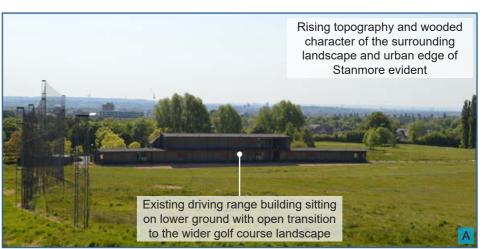
Site Specific Character

- 3.8 In order to gain an understanding of how the site fits within the local landscape, Tyler Grange has undertaken a site specific assessment which considers features, landscape structures, land use, enclosure, condition and characteristics of the site and the surrounding Golf Course in which it is contained. This should be read in conjunction with **Plan 3** and with internal views **A-I.**
- 3.9 This should also be read in conjunction with the assessment in **Section 7** and the review of the site in development in PDL Green Belt and Openness.

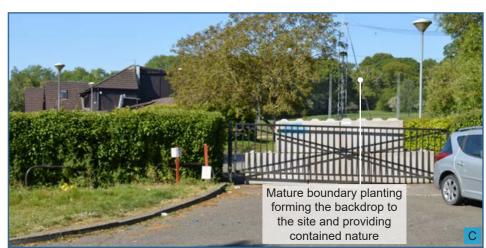
Plan 3: Site Specific Character









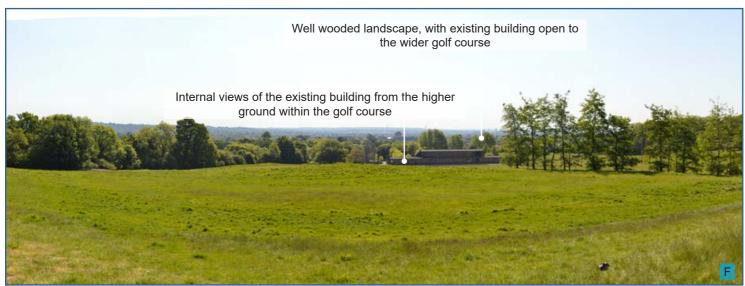


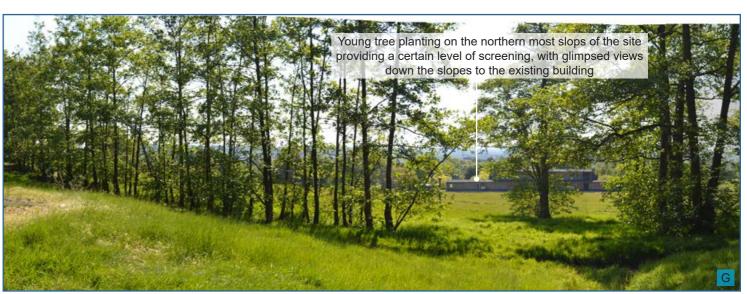


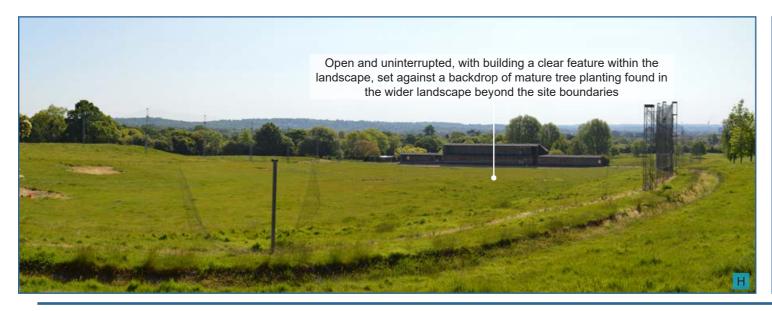


















Context

- 3.10 The site is located on the northern edge of the suburb of Stanmore. Forming part of the larger golf course, the site sits on land within the centre of the golf course at the existing location of the golf club house and associated area of car parking.
- 3.11 As seen on **Plan 3**, the site is located within a well wooded landscape with mature woodland planting forming an established landscape framework.
- 3.12 The presence of mature tree planting provides a contained and secluded character to much of the site, and the presence of this established landscaping found along much of the length of Brockley Road separates the site from the wider landscape to the east as seen on **Plan 3**.

Topography

3.13 The wider golf course rises to the north with a high point of approximately 115 AOD at the north western corner and a low point of approximately 100 AOD at the south eastern corner as illustrated on Images A,F and H. The building and area of existing car parking lies on a low lying and flat part of the site and the existing building sits below the tree line seen to the south of the site as illustrated on Image H.

Access

3.14 The access into the site is gained off Brockley Hill at the eastern boundary as illustrated on **Image C**. This access point comprises a metal gate, with associated hedgerow planting and mature tree planting flanking the eastern boundary of the site. It provides a developed character.

Existing Buildings

- 3.15 The existing club house building on the site is located on the bottom slopes of the golf course. This building as seen on Images A-I is a long building cutting across the site, with two 'wing' structures emerging from the central hub of the building to the east and west.
- 3.16 Within the wider landscape the building is a pronounced feature when viewed from the northern part of the golf course, with no landscape transition or planting to soften the built form.
- 3.17 Brick work and timber fencing associated with the building, storage and golf course land use form a feature within the site

and add to the developed nature.

<u>Hardstanding</u>

- 3.18 The existing car parking and area of hardstanding is located to the south of the existing building. This car parking area includes existing established tree and hedge planting which softens the appearance of the building and assists in integrating it into the existing golf course landscaping to the south. Image D and E.
- 3.19 To the north of the building is an area of sand associated with the driving range.

Internal Landscape Features

- 3.20 Existing tree planting, hedgerows and shrubs are present within the car parking area to the south of the building. This existing landscaping is established and assists with softening the building to integrate it into the wider landscape when seen from the south.
- 3.21 The presence of netting, lighting and signage associated with the existing golf course land use reaffirm the site's settled context and formal recreational land use as seen on **Image A, C and H**

Boundaries

North

3.22 The northern boundary of the site is open to the wider golf course.

South

3.23 The boundary at the south of the site comprises mature tree planting and low level hedging as illustrated on **Image I**. Much of this planting provides a contained character to the area around the building and the car park.

East

3.24 The eastern boundary of the site adjoins Brockley Hill, where the existing access into the site can be found (as illustrated on **Image C**). Low level hedge planting found directly at the entrance adjoins more mature tree and scrub planting found along Brockley Hill, and this planting provides a contained character for much of the eastern part of the site. In places gaps in the planting found along Brockley Hill are present.

West

3.25 The boundary to the west of the site is open to the golf course. Beyond this boundary, an established belt of mature tree planting found to Stanmore Country Park. This mature planting provides a dense and established landscape framework within which the site is set, as illustrated on **Plan 3**.

Site Specific Conclusion

- 3.26 The surrounding tree cover of the wider landscape beyond the site boundaries sets the site within a well wooded landscape. The existing building sits on the lower lying bottom slopes of the site and is contained from the south by existing tree planting found to the southern boundary.
- 3.27 The topography of the golf course which rises to the north of the site is more open in character, although the wider landscape is separated from the site due to the established boundary planting, meaning that the site is not related to the wider landscape beyond.
- 3.28 Planting found to the southern boundary adds to this contained and secluded nature with the existing building sitting below the skyline.



Published Landscape Character

- 3.29 The landscape character of the land within the study area has been considered by a hierarchy of landscape character assessments at national, district and local level. At a national level the characteristics of the site are localised and not relevant to the overall published landscape character.
- 3.30 For the purpose of assessing the effects of development, National Character Areas are relevant for understanding the broad landscape context, and although the site and its surroundings share some of the key characteristics associated with these character areas, the mapping is not of a level of detail sufficient to provide an appreciation of the specific local level landscape character and context issues pertaining to the site itself which need to be taken into account in the development process.

County Landscape Character Assessment

<u>London's Natural Signatures: The London Landscape</u> <u>Framework</u>

- 3.31 The site is located within the 'Barnet Plateau' Natural Landscape Area. The 'Natural Signature' of this area is 'Long views from remnant heathy common'. The key characteristics are:
 - The early settlement cores (Stanmore, Harrow, Hadley and Horsenden) are linked by the extensive urban areas of Barnet, Edgware, Kenton, Wembley and Greenford.
 - To the north, there are traditional patches of farmland with rectangular fields enclosed by hedgerows. Blocks of native woodland are interspersed throughout and there are often golf courses towards the outer fringes of the farmland.
 - To the north, there are commons and several high open spaces.
 - The area retains a field and farmland character to its natural spaces;
 - Pockets of natural countryside remain within the urban fabric of London:
 - Ancient woodland is retained, as well as remnant heathland communities with heather, bracken, transitional, secondary birch woodland.

- Coppice woodland on both wet and dry land;
- Common land has traditional cultural links;
- There are spectacular views from many high points along the plateau;
- There is a network of streams with floodplain meadows and ponds throughout the area;
- · Lines of willow mark the meandering alignment of streams;
- · Veteran trees and ancient hedgerows;
- 3.32 The site is located to the immediate 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 document details that Stanmore Common is at 134m AOD and is an area of former heathland now dominated by birch woodland.
- 3.33 The adjoining golf course shares some of the characteristics of the published LCA, with mature woodland to the golf course boundaries and long ranging views from the top slopes of the wider site. These views are not public.
- 3.34 However, the site is very much influenced by the peri-urban environment, and its golf course land use. The presence of netting, the existing club house, and lighting associated with the golf course provide urbanising features within the landscape and set the site in a more settled and sub-urban context.
- 3.35 The established mature tree planting found to the eastern boundary along Brockley Hill separates the site from the wider and more open landscape to the east and the site is therefore not related to this wider landscape beyond.
- 3.36 The commons of Stanmore Country Park and Wood Farm located to the north west of the site are key characteristics of the LCA, however, the presence of extensive tree cover at the site boundaries and within Stanmore Country Park itself means the site does not share these characteristics.
- 3.37 Although not immediately adjacent to the settlement edge, Brockley Hill forms the eastern boundary of the site and the close proximity of the M1 motorway to the north provide further urbanising influences, and the site is not set in a tranquil or unsettled context.
- 3.38 Existing tree planting found to the edges of the site and

beyond within the wider golf course is typical of the land use and character or golf course landscaping, however there are some scattered willows found to the south of the site which are characteristic of the published LCA.

Landscape Character Conclusion

Key characteristics to retain:

- Internal tree planting within the car park should be retained and incorporated into the proposals;
- Retention of tree planting along Brockley Hill to retain separation from wider landscape to the east; and
- Development retained on existing footprint and location of existing built form.

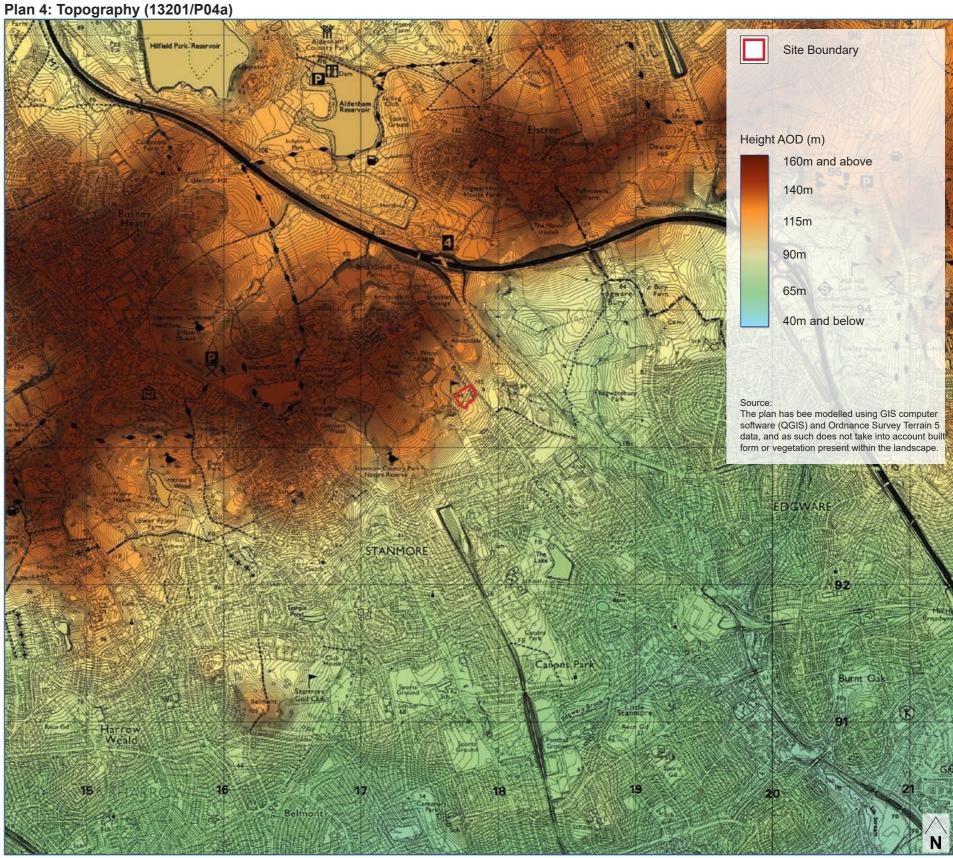
Features informing development:

- Access point retained at current location to avoid any tree loss;
- Recommendation to remove uncharacteristic and detracting landscape features including netting, fencing and lighting associated with the golf course and driving range;
- The location and placement of the existing building and areas of built form and hardstanding should be used to inform the location of the proposed development;
- Ensuring proposed development is retained and sits below the skyline and existing tree cover found to the south;
- Opportunities to provide additional hedgerow planting within the site:
- Opportunities to increase biodiversity on site through the implementation of new SUDS / ponds, enhancement to the grassland habitats with new meadow and wild flower planting, with habitat creation in the form of new bat and bird boxes in conjunction with new planting; and
- Additional tree planting along the southern boundary to increase east-west landscape corridor and ecological links across the site.



Visual Context and Visual Receptors

- 3.39 In order to establish the degree of any change that may arise from future development on site and the extent to which such changes will affect identified local receptors, it is important to understand the existing situation in terms of visual amenity alongside the availability and context of views associated with the local area. Chapter 6 of the GLVIA3 sets out how the visual baseline is established. The baseline should establish the area in which the proposed development may be visible, those people who may experience views of the development, the key viewpoints representative of affected views and the nature of the views at the viewpoints.
- 3.40 The visibility of the site considers representative views towards it from the surrounding area. This is based on the findings of topographical mapping (Plan 4: Topography) and Geographic Information System (GIS) first sieve analysis mapping (Plan 6, 7 and 8: Zone of Theoretical Visibility (ZTV)) and has been refined and verified through field assessment.
- 3.41 As illustrated on **Plan 5**, the site is located in a sloping landscape with varying topography.
- 3.42 Located on the slopes of the Harrow Wealds the site has localised topography with the highest point located at the north at approximately 115 AOD at the north western corner and a low point of approximately 100 AOD at the south eastern corner.

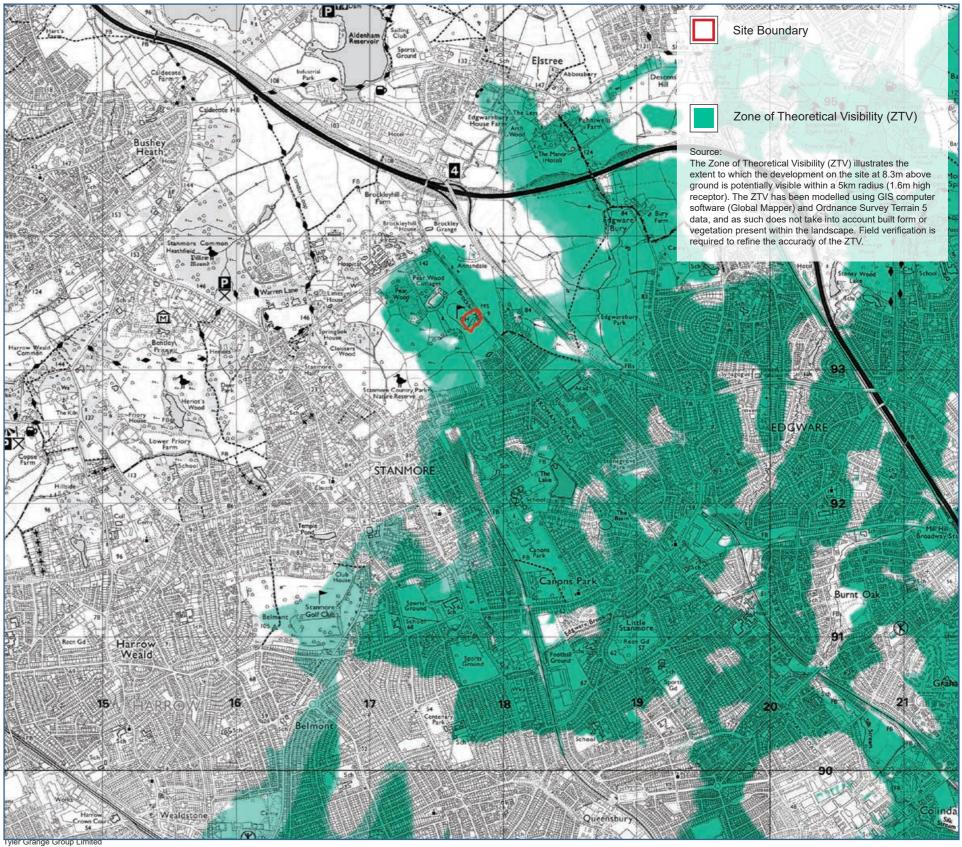






- 3.43 Two Zone of Theoretical Visibility Plans have been produced to identify the potential visibility of the site.
- 3.44 The first (**Plan 5**: Zone of Theoretical Visibility Bare Earth) is based on Ordnance Survey Terrain 5 data only, and does not take into account built form or vegetation present within the landscape.
- 3.45 The software generated image illustrates the extent to which development of up to 8.5m high on the site would be potentially visible within a 5km radius to a 1.6m high receptor.
- 3.46 The bare earth ZTV therefore clearly identifies the influence of the topography in limiting views, but does not identify the influence of built form and the well wooded nature of the landscape in limiting visibility.
- 3.47 Given the local landform and the dense woodland vegetation in the areas surrounding the site, the bare earth ZTV indicates a considerably greater area than in reality.
- 3.48 To further inform the potential visibility of the development of the site a second ZTV Plan was produced. The second (Plan 6: Zone of Theoretical Visibility Lidar Data) is based on LIDAR First Return Digital Surface Model (FZ DSM). Combined with the Terrain 5 data, the LIDAR ZTV image illustrates the extent to which development of the site up to 8.5m on the site would potentially be visible within a 5 m radius to a 1.6m high receptor and takes into account the presence of buildings, man-made objects, as well as vegetation and other massing which may influence the potential visibility of the development.
- 3.49 As illustrated on **Plan 6**, the Lidar ZTV identifies a significantly lower potential for visibility. This is due to the presence of extensive areas of woodland, intervening vegetation found at field boundaries in the wider landscape and the extensive areas of built form found to the west, south and east of the site.
- 3.50 The two ZTV Plans and the first sieve exercise have assisted in informing the field visit and visibility has been verified in the field.
- 3.51 A number of representative viewpoints have been included that illustrate the approximate extent of areas from which the site is visible. These are illustrated further on in **Section 3** of this report.
- 3.52 In accordance with GLVIA3, the visual analysis is based on views from external spaces within the public domain excluding barely discernible views and not from inside buildings or private spaces. However, where notable views from private properties are possible, these have been considered where relevant.

Plan 5: GIS Zone of Theoretical Visibility - Bare Earth (13201/P06a)







11

- 3.53 Photographs were taken in May 2020 from selected viewpoints with a digital camera with an equivalent 50mm focal length lens at eye level (approximately 1600mm above ground). A total of 10 representative viewpoints have been chosen from locations surrounding the site to enable the effects of the development to be assessed from all directions (see **Photoviewpoints 1-10**).
- 3.54 Whilst the views are chosen to be representative of the area, they cannot provide continuous coverage of all potential locations within the vicinity of the development. Often, views will occur as a sequence within the surrounding environment, with the most significant views assessed further within this report.
- 3.55 Likewise, where transient or fleeting views are possible, these will also be assessed as part of the report.

Site Boundary Zone of Theoretical Visibility (ZTV) The Zone of Theoretical Visibility (ZTV) illustrates the extent to which the proposed development on the site at 8.5m above ground is potentially visible within a 5km radius 1.6m high receptor). The ZTV has been modelled using GIS computer software (Global Mapper) and LIDAR data (National LIDAR Programme 2018, 1m resolution), and as such takes into account built form or vegetation present within the landscape. Field verification is required to refine

Plan 6: GIS Zone of Theoretical Visibility - Lidar Data (13201/P07a)





Public Rights of Way

- 4.1 Public rights of way are limited in the surrounding landscape and no public footpaths are present within the site itself (as illustrated on **Plan 7**).
- 4.2 To the south east a PRoW is located off Pipers Green Lane.
- 4.3 There are a number of publicly accessible routes found within Stanmore Country Park and Pear Wood, and although these are not PRoW these are well used footpaths and located on accessible common land.
- 4.4 To the east of the site the presence of the M1 motorway somewhat limits accessible footpath routes in the locality. However, a bridleway and PRoW can be found off Edgware Road to the east.

Extent of Visibility

- 4.5 The adjacent **Plan 7** illustrates the representative Photoviewpoint locations and should be read in conjunction with **Photoviewpoints 1-10**.
- 4.6 Views of the site are limited and localised, to views within 0.5km. There are no middle or long distance views. These limited views are due to the presence of tree planting and the undulating topography in the wider landscape.

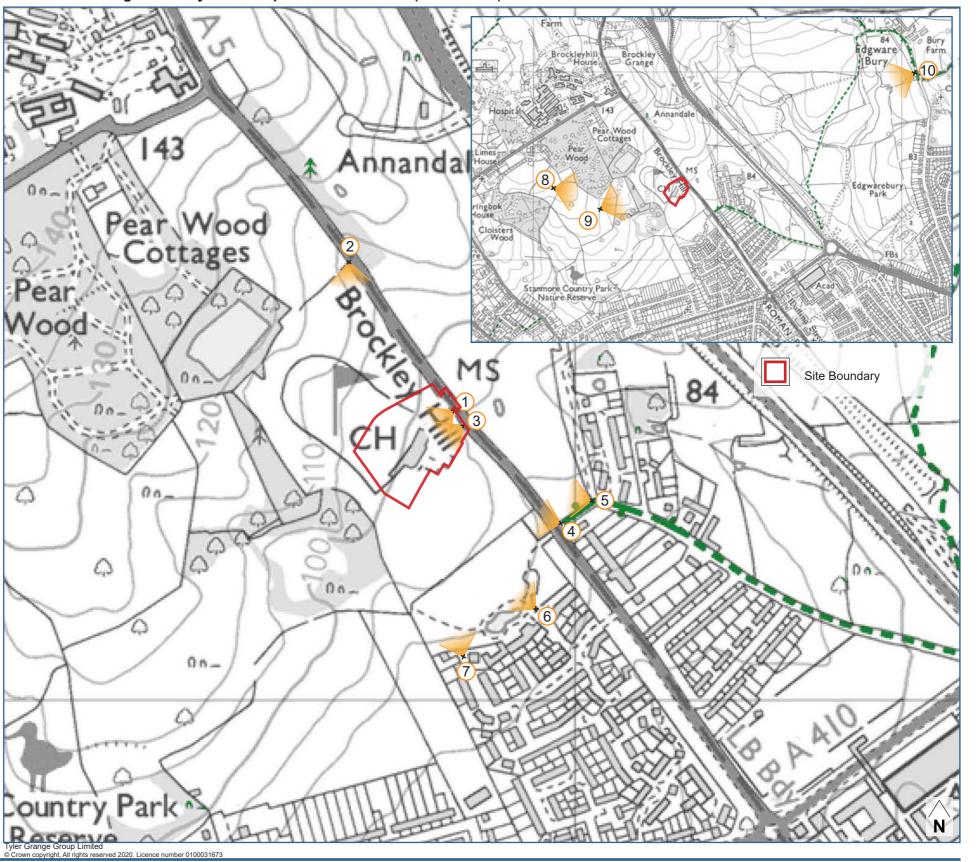
Views from the North

4.7 From the north views of the site are obstructed due to the presence of tree planting found around Pear Wood and along Brockley Hill as illustrated on representative **Photoviewpoint 2**.

Views from the East

- 4.8 From the east, direct views can be seen at the entrance off Brockley Hill as illustrated on representative Photoviewpoint
 1. Glimpsed views can also be seen through gaps in existing planting found along Brockley Hill as illustrated on representative Photoviewpoint 3 although most of these views are filtered by the presence of existing vegetation.
- 4.9 The presence of tree planting found along Brockley Hill and planting in the wider landscape further limits visibility in views to the east, as seen in representative **Photoviewpoint 5**, with tree and hedgerow planting found along the PRoW at Pipers Lane limiting visibility.

Plan 7: Public Rights of Way and Viewpoint Location Plan (13201/P08a)





4.10 Further east, middle and long distance views are not possible due to the well wooded and mature tree planting as illustrated on representative **Photoviewpoint 10**.

Views from the South

- 4.11 From the south, views of the site are filtered by the presence of tree and hedgerow planting found along the southern boundary of the golf course.
- 4.12 Planting associated with Cleopatra Close Park which is located between the golf course and the northern edge of Stanmore also filters views of the site as seen on representative **Photoviewpoint** 6 and 7.
- 4.13 Representative **Photoviewpoint 4**, also illustrates the mature planting in the wider landscape with views of the site filtered from this location.

Views from the West

- 4.14 From the west, short, middle and long distant views of the site are not possible due to the presence of woodland planting at Pear Wood and Stanmore Country Park as illustrated on representative **Photoviewpoints 8 and 9**.
- 4.15 The following representative **Photoviewpoints 1-10** illustrate the potential visibility of the site in more detail.

Photoviewpoint 1:

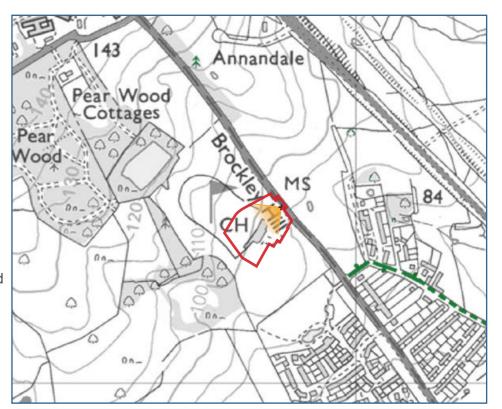
- 4.16 Taken from the entrance into the site at Brockley Hill, the site is seen sitting within a well treed landscape, with mature tree planting at Brockley Hill framing the building.
- 4.17 Lighting and netting associated with the golf course and driving range can also be seen from this location.
- 4.18 The existing building is seen against the backdrop of existing mature tree planting found along the western boundary of the golf course.
- 4.19 Existing tree planting found along the access road into the site provides some filtering of the existing building and the existing hedgerow found to the boundary of the site is seen in the foreground of the view.

Receptors

- Transient users of Brockley Hill; and
- · Recreational users of Brockley Hill.

Design Recommendations

- · Retention of boundary planting at Brockley Hill (allowing for necessary visibility splays);
- Retention of internal planting around car park;
- Consideration of treatment of entrance into the site;
- · Opportunity to remove lighting, netting and signage associated with driving range; and
- Additional internal tree planting to soften views from the east and improve existing situation.





Photoviewpoint 1: Taken from Brockley Hill at the existing entrance into the site.

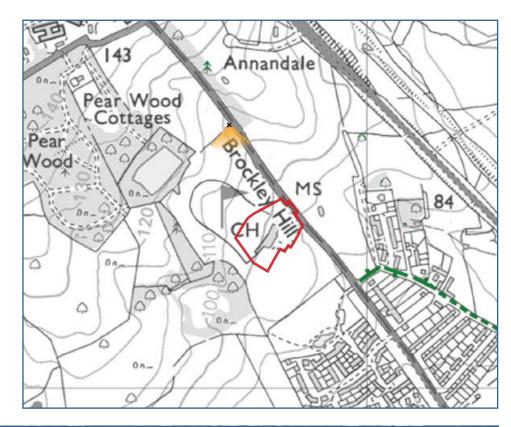


Photoviewpoint 2:

- 4.20 Taken from Brockley Hill to the north east of the site, this view at the north east corner of the existing golf course illustrates the heavily treed route along Brockley Hill and the rising topography of the landscape.
- 4.21 This established mature tree planting limits visibility of the site.

Receptors

- Transient users of Brockley Hill; and
- · Recreational users of Brockley Hill.



South

Orientation:



Photoviewpoint 2: Taken from Brockley Hill at the north eastern corner of the land ownership boundary and edge of the golf course.

Photoviewpoint 3:

- 4.22 Taken from Brockley Hill at the sites eastern boundary, glimpsed views of the site are possible.
- 4.23 Gaps in the existing boundary planting found along Brockley Hill mean that glimpsed views of the existing building can be seen within this view, and these views are seen within the context of the surrounding internal car park planting found within the site boundary.
- 4.24 The existing building can be seen against the backdrop of the tree planting found to the western boundary of the golf course and gives the site a secluded character and nature.
- 4.25 Lighting and signage associated with the wider golf course can also be seen within this view near to the existing entrance into the site.

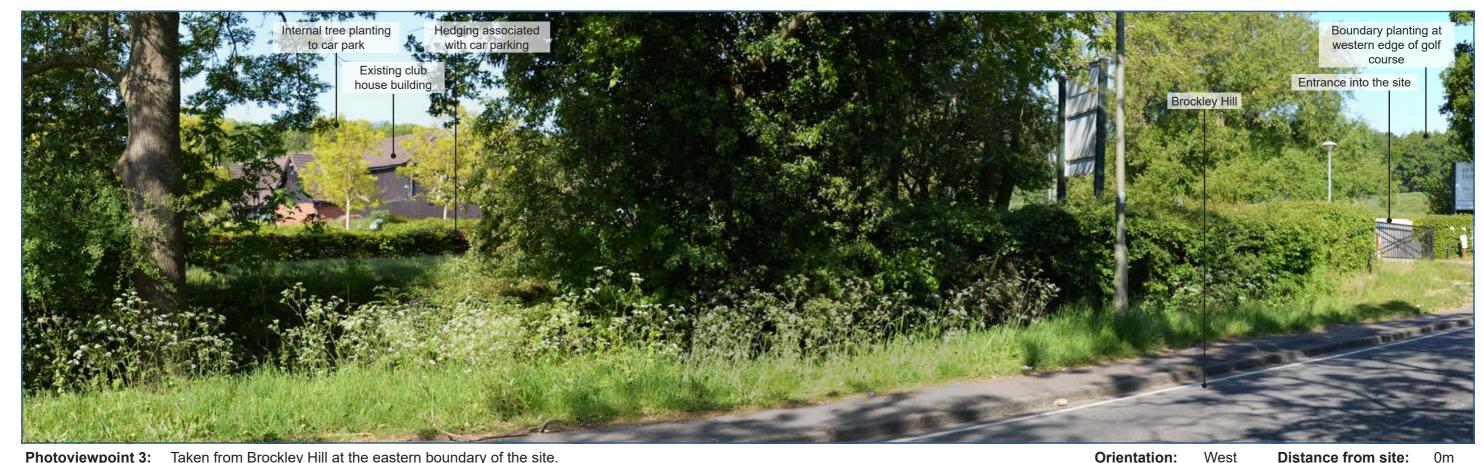
Receptors

- Transient users of Brockley Hill; and
- · Recreational users of Brockley Hill.

Design Recommendations

- · Retention of boundary planting at Brockley Hill;
- Retention of internal planting around car park;
- Consideration of treatment of entrance into the site;
- Opportunity to remove lighting, netting and signage associated with driving range; and
- Additional internal tree planting to soften views from the east and improve existing situation.





Photoviewpoint 3: Taken from Brockley Hill at the eastern boundary of the site.

Photoviewpoint 4:

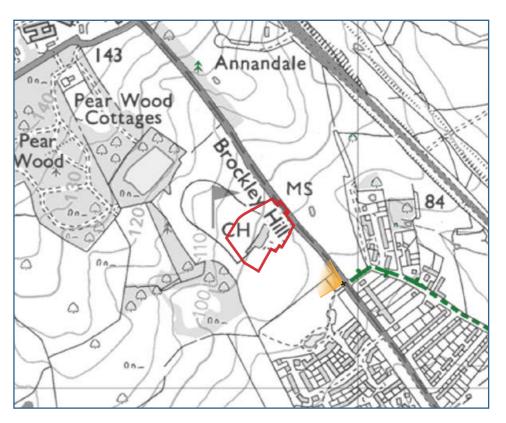
- 4.26 Taken from the junction of Pipers Green and Brockley Hill, the site is not visible from this location.
- 4.27 Mature tree planting which flanks both sides of Brockley Hill forms much of the view. Mature tree and shrub planting is also seen at the southern boundary of the golf course.
- 4.28 This characteristic tree planting filters views of the site, and this combined with the placement of the site within the wider golf course limits visibility.

Receptors

- · Transient users of Pipers Green Lane;
- Transient users of Brockley Hill
- · Recreational users of PRoW off Pipers Green Lane;

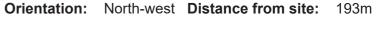
Design Recommendations

· Retention of boundary planting at Brockley Hill;





Photoviewpoint 4: Taken from the start of PRoW off Pipers Green Lane which adjoins Brockley Hill.



Photoviewpoint 5:

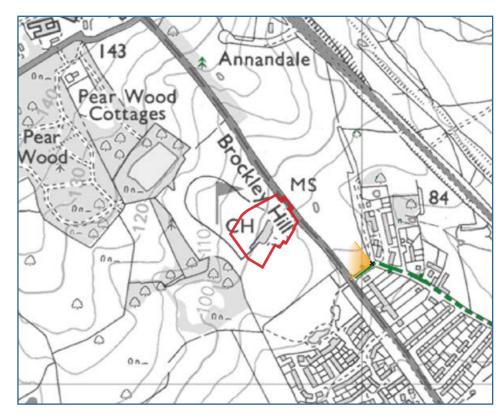
- 4.29 Taken from Pipers Lane and the Bridleway to the south east of the site. The presence of mature tree planting found along Brockley Hill can be seen through gaps in the hedgerow. This combined with hedgerow planting found along Pipers Lane filters views of the site.
- 4.30 The gradually rising land along Brockley Hill can also be seen from this location, further limiting visibility.
- 4.31 Receptors will not experience a change in their view from this location.

Receptors

- · Transient users of Pipers Green Lane; and
- Recreational users of PRoW off Pipers Green Lane.

Design Recommendations

· Retention of boundary planting at Brockley Hill;





Photoviewpoint 5: Taken from PRoW located along Pipers Green Lane.

West **Distance from site**: 207m

Orientation:

Photoviewpoint 6:

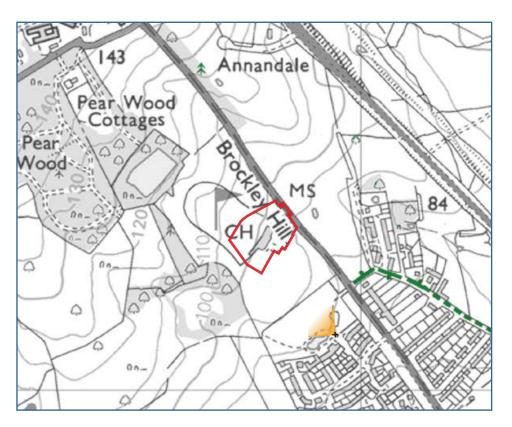
- 4.32 Taken from the entrance to Cleopatra Park and Stanmore Country Park, the site is seen sitting at the backdrop of the view behind existing boundary planting along the southern edge of the golf course.
- 4.33 The existing building within the site cannot be seen by residential receptors to the south due to the presence of existing boundary tree planting.
- 4.34 The location of the existing building and set back from the existing golf course boundary further prevent available views of the site,
- 4.35 Scattered tree planting within the park also assists in filtering view of the site.

Receptors

- Recreational users of Cleopatra Close Park and Stanmore Country Park; and
- · Residents of Cleopatra Close Park.

Design Recommendations

• Retention of planting along southern boundary of golf course.



Orientation:

North



Photoviewpoint 6: Taken from the entrance into Cleopatra Park and Stanmore Country Park off Cleopatra Close

Distance from site: 230m

Photoviewpoint 7:

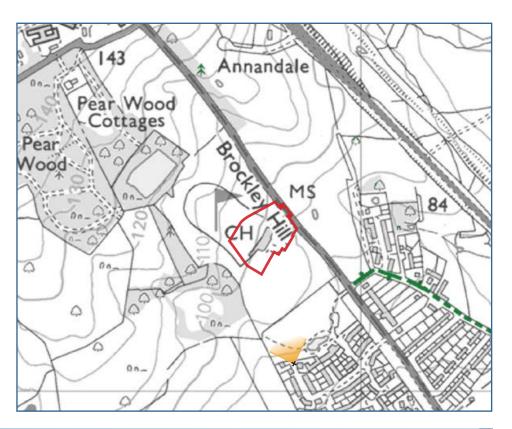
- 4.36 Taken from Augustus Close to the south of the site, the site is located behind existing boundary planting along the southern edge of the golf course.
- 4.37 The existing building within the site cannot be seen by residential receptors to the south due to the presence of existing boundary tree planting.
- 4.38 The existing infrastructure, fencing and lighting associated with the golf course is also not visible from this location.
- 4.39 The location of the existing building and set back from the existing golf course boundary further prevent available views of the site.

Receptors

- Recreational users of Cleopatra Close Park and Stanmore Country Park; and
- · Residents of Augustus Close.

Design Recommendations

• Retention of planting along southern boundary of golf course.





Photoviewpoint 7: Taken from residential edge of Augustus Close.



Orientation:

North

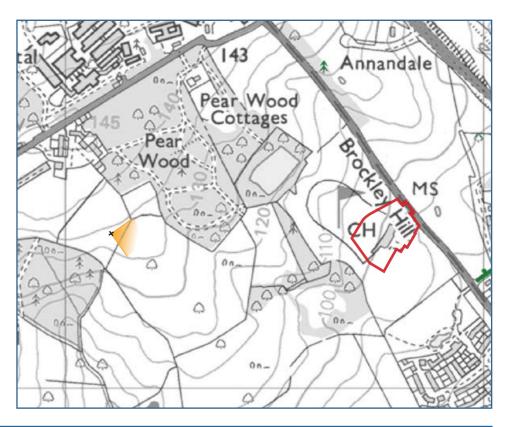
Photoviewpoint 8:

- 4.40 Taken from the viewpoint at Wood Farm, views of the site are filtered by the presence of mature woodland planting found within Pear Wood and to the boundaries of the golf course.
- 4.41 Panoramic views of the site can be seen from this location, and this view is identified within the Harrow Views Assessment.
- 4.42 However, as identified the development of the site will not impact on this key view, with the skyline of the wider northern edge of Harrow and London seen to the right of the view.

Receptors

Recreational users of the footpaths within Stanmore Country

Park





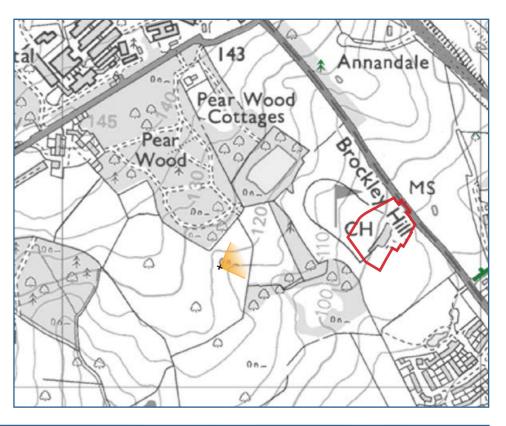
Photoviewpoint 8: Taken from Wood Farm Viewpoint.

Photoviewpoint 9:

- 4.43 Taken from a permissive footpath within Stanmore Country Park, views of the site are screened due to the presence of mature tree planting sitting along the western boundary of the golf course.
- 4.44 This established planting filters views and receptors using this network of footpath are unlikely to experience any change in their view as a result in the development on the site.
- 4.45 The characteristic planting seen within the wider landscape sets the site within a well wooded and secluded landscape.

Receptors

• Recreational users of the footpaths within Stanmore Country





Photoviewpoint 9: Taken from permissive footpath within Wood Farm Country Park.

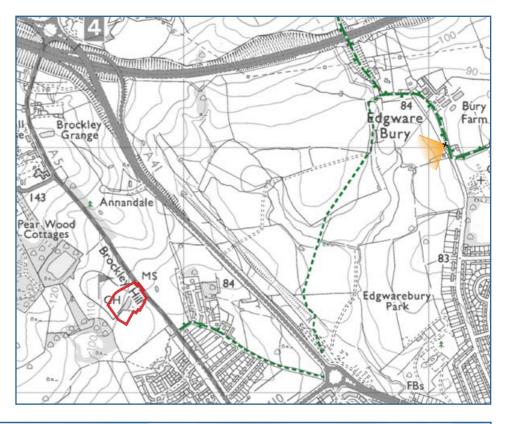
Orientation:

Photoviewpoint 10:

- 4.46 Views from Bridleway off Edgwarebury Lane to the east of the site illustrate the heavily wooded nature of the surrounding landscape and mature tree planting is a common feature in the wider landscape to the east of the site.
- 4.47 From the network of public footpaths to the east of the site views are filtered by the presence of mature tree planting surrounding the site and within its vicinity.
- 4.48 It is likely as well that the small scale of the site, the topography and planting will reduce the potential visibility for receptors using these footpaths.

Receptors

- · Recreational users of Bridleway off Edgwarebury Lane; and
- Transient users of Edgwarebury Lane.





Photoviewpoint 10: Taken from Bridleway off Edgwarebury Lane.

- 4.49 The appraisal of the visual context within this section has included a review of the extent of visibility, the nature of views and receptors likely to experience a change in their view as a result of the development of the site.
- 4.50 The Harrow Key Views Assessment which identifies a key protected view from the Country Park at Wood Farm was assessed as part of the proposals, as identified at representative **Photoviewpoint 8**. From this representative photoviewpoint views of the site are not possible and will not impact on the key sensitivities or panorama of the London skyline or the wider landscape which are identified within the Harrow Key Views Assessment.
- 4.51 Reference has been made to the representative **Photoviewpoints 1-10** and a summary of the findings are detailed below:

Extent of views

- 4.52 Views of the site are localised and limited. No middle or long distance views of the site are possible due to the heavily wooded surrounding landscape and rising topography to the north of the site.
- 4.53 The development of the site will not impact on the key views identified within the Harrow Views Assessment as identified earlier within this section of the report.

Nature of Views

- 4.54 The established mature tree planting found in the surrounding landscape as well as the rising topography to the north of the site limits visibility with the site located within a contained and well-treed landscape.
- 4.55 Where views of the site are possible along Brockley Hill to the east, these views are limited and framed by existing tree planting which flanks Brockley Hill.
- 4.56 Glimpsed views can be seen through gaps in the boundary planting at the eastern boundary along Brockley Hill close to the entrance into the site. Where views are possible, the existing club house building can be seen, and is viewed amongst internal tree planting and against a backdrop of planting found to the western boundary of the wider landscape.
- 4.57 Where direct views are possible, features associated with the existing landuse of the golf course are visible, with fencing, netting, lighting and signage seen within the view.

4.58 Views from the wider landscape are filtered by the presence of existing mature tree planting. The higher land found to the north of the site is heavily wooded with Pear Tree Wood and Stanmore Country Park sitting above the site and the golf course, and this prevents visibility.

Receptors

4.59 Receptors likely to experience a change in their view as a result of any proposed development are limited to transient users of Brockley Hill as illustrated on representative **Photoviewpoints 1** and 3.

Conclusions on Views/Visibility

- The site sits within a well wooded landscape and views are limited and localised;
- Glimpsed views of the site are possible off Brockley Hill at its entrance to the east, and in these views the building is seen sitting below the skyline against the backdrop of the existing western boundary tree planting of the golf course. Receptors experiencing these short distance localised views also see lighting, netting and signage associated with the driving range;
- Long distance views of the site are not possible due to the intervening vegetation, topography and extensive areas of built form in the wider landscape;
- Views of the site from the key viewpoint identified within the Harrow View Assessment at Wood Farm are filtered by existing tree planting and woodland belts, and this panoramic important view will not be impacted by the development of the site; and
- Receptors likely to experience a change in their view will be transitional users of Brockley Hill, who will see passing views of the site and are likely to be travelling at speed.

Features which drive opportunities and constraints

- Retention of tree planting found along Brockley Hill to ensure views are filtered:
- Removal of lighting and netting associated with golf course;
- Retention of building at the same or lower height of the existing building on site to ensure it does not break the skyline above the trees within views;
- Retention of existing tree planting at the car park and around the building to filter views of the proposed building;
- Retention of the internal planting found along the southern part of the site to provide additional filtering of views from the residential edge to the south of the site; and
- Opportunities to provide additional internal tree planting to further filter views of the building.

Proposals

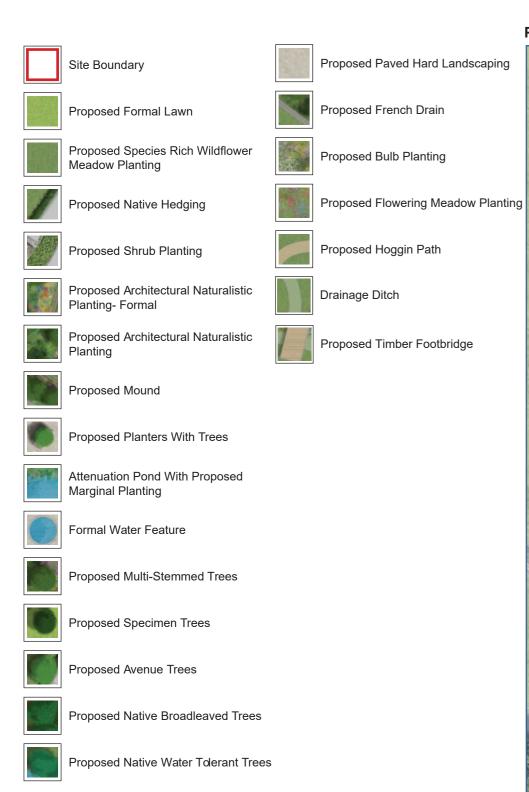
- 5.1 In response to the landscape and visual baseline analysis, a series of landscape objectives, and opportunities and constraints have been identified to ensure that the development response reflects the local circumstances and addresses opportunities for landscape enhancement. The design response has also been informed by the various pre application meetings, design review panel input and GLA Panel input.
- 5.2 The following sets out aspects of the existing situation of the site to inform its development and should be read in conjunction with Plan 8: Landscape Opportunities and Constraints Plan on the following page:
 - Development should be retained on existing building footprint and area of hardstanding and on low lying land to retain contained and secluded character;
 - Development on PDL within the Green Belt will need to assess mass, layout, footprint and impacts on the openness of the Green Belt (this will be explored further within **Section** 7 of this report);
 - Retain the existing internal tree planting around the car park and existing building to integrate the proposed building into the landscape and soften the built form;
 - Potential to improve and integrate building into the landscape to the north through additional characteristic tree planting to soften the built form and provide additional ecological and landscape benefits;
 - Opportunity for additional tree planting, characteristic of the Barnet Plateau LCA with the planting of specimen oak, birch and hornbeam. Additional planting will assist with integrating the building into the wider landscape and will be an improvement on the existing situation within the site in terms of canopy coverage, habitat creation and species diversity.
 - Retain and enhance existing tree planting along the to southern boundary to filter views; and
 - Removal of existing bunkers within red line boundary to enhance setting of building and provide additional opportunities for ecological enhancements.



Plan 8: Landscape Opportunities and Constraints (13201/P08)

Development retained on existing building footprint and area of hardstanding and on low lying land to retain contained and secluded character from the south, and respect openness of the Green Belt Potential to provide formal landscape setting adjacent to proposed building to enhance wider landscape and transition to retained landscape of golf course to the north





Plan 9: Landscape Strategy Plan (13201/P11d)



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- 5.3 The broad themes that have emerged through the Opportunities and Constraints Plan have been utilised to inform a Landscape Strategy Plan for the site (see Plan 9: Landscape Strategy Plan) to accompany the development proposals. The Landscape Strategy Plan demonstrates the following:
 - Retention of boundary planting along Brockley Hill to ensure views from the wider land to the east are filtered;
 - Proposed additional tree planting across the southern boundary of the site, to provide additional green infrastructure links and provide additional tree planting characteristic of the published LCA;
 - Existing lighting and netting removed and existing bunkers filled in and utilised for ecological enhancements; and
 - Proposed SuDS pond along the southern boundary of the site, utilising the existing drainage ditch with the provision of a new timber bridge as a means of connecting the secret garden area into the wider meadow planting whilst creating a formal vantage point; and
 - Tree planting avoided along eastern part of the site where constraints associated with Roman road are present;
 - Retention of existing internal tree planting found within car park to soften the building and filter views;
 - Proposed mounding to the north west of the building to provide a soft edge to the site whilst accommodating the proposed French Drain feature. Additional tree planiting will provide increased characteristic planting and will also integrate the building into the proposed landscape, with a much more sensitive approach and improvement on the existing situation. Proposed tree planting will be beneficial in retaining the openness of the Green Belt;
 - Retention of the building on the existing footprint and hardstanding (explored further in Section 7); and
 - Proposed formal hoggin footpath creating accessible pedestrian connection towards the western corner of the the site with informal seating and pergola.



6 Implications of Development

Landscape Sensitivity

6.1 As set-out within GLVIA3 the sensitivity of the development is a combination of the value and susceptibility of the receiving landscape to the proposed development. Each of these is examined below:

Landscape Value

- 6.2 GLVIA3 defines the value of the landscape as: "The relative value that is attached to different landscapes by society. A landscape may be valued by different stakeholders for a whole variety of reasons" (GLVIA3, Glossary, page 157).
- 6.3 GLVIA3 recognises that land that is not designated can still have local value and sets-out a range of factors that may provide an indication of landscape value at Box 5.1 (GLVIA3 page 84). These can be used to determine those aspects of an area or landscape that may be valued at a local level, these include the following:
 - "Landscape Quality (condition): A measure of the physical state of the landscape. It may include the extent to which typical character is represented in individual areas, the intactness of the landscape and the condition of individual elements:
 - Scenic Quality: The term used to describe landscapes which appeal primarily to the senses (primarily but not wholly the visual senses);
 - Rarity: The presence of rare features and elements in the landscape or the presence of a rare Landscape Character Type;
 - Representativeness: Whether the landscape contains a particular character, and/or features and elements, which are considered particularly important examples;
 - Conservation interests: The presence of features of wildlife, earth science or archaeological or historical and cultural interest can add to the value of a landscape as well as having value in their own right;
 - Recreation value: Evidence that the landscape is valued for recreational activity where experience of the landscape is important;
 - Perceptual aspects: A landscape may be valued for its perceptual qualities and/or tranquillity; and

- Associations: Some landscapes are associated with particular people, such as artists or writers, or event in history that contribute to perceptions of natural beauty of the area."
- 6.4 For each of these indicators, this assessment has adopted a range from 'good' through 'ordinary' to 'poor'. The descriptions below explains the judgement for each of these factors.
- 6.5 Judgements are made with reference to the observable landscape features, which can include components such as landform, vegetation, housing, roads, boundary treatments etc.

Landscape and Scenic Quality

- 6.6 The site comprises an existing club house building, areas of car parking and forms part of the wider golf course setting.
- 6.7 The site is surrounded by mature tree planting, and the wider golf course landscape sets it in a peri-urban environment, with the presence of the busy Brockley Hill road to the east influencing the site. There are representative landscape features found at the boundaries of the site with the mature tree planting found along Brockley Hill and to Stanmore Country Park beyond the site to the west being representative of the wider landscape.
- 6.8 Lighting, netting and fencing are detracting features within the vicinity of the site and although there are established belts of planting which are characteristic of the wider landscape, the golf course use and its peri-urban context means that the site is no more than 'Ordinary' in its landscape scenic value.

Rarity and Representativeness

6.9 The site is peri-urban in its nature and although there are representative landscape features found at the boundaries of the site, overall the site is not representative of the wider landscape and displays a more developed and peri-urban character. The site therefore is 'Ordinary' with regard to Rarity and Representativeness.

Conservation Interests

6.10 There are no TPO trees within the site itself, although there are group TPO's found within Stanmore Country Park to the west and to the north of the site. There are no listed buildings within the site, although there are remnants of a Roman road found alongside Brockley Hill on the eastern part of the site. The site is therefore classed as 'Ordinary' with regards to Conservation Interests.

Recreational Value

6.11 There are recreational footpath routes running through Stanmore Country Park to the north and west of the site and found within Cleopatra Close Park to the south of the site, however, there are no publicly accessible routes within the site itself. The value is considered as being 'Poor' for the site in this respect.

Perceptual Aspects

- 6.12 Visibility of the site is limited due to the presence of mature tree planting found to the boundaries of the site. Glimpsed views of the site can be seen at places along Brockley Hill, although these views are limited and experienced by transient users.
- 6.13 The enclosed and contained nature of the site reduces visibility from the wider landscape and to the north and west, mature tree planting found within Stanmore Country Park reduces visibility.
- 6.14 Considering the local context, therefore, the site is *'Poor'* in terms of perceptual aspects.

Associations

6.15 There are remnants of a Roman Road running alongside Brockley Hill on the western part of the site, however the presence of this is not visible on the site as it stands and therefore there are no associations between the site and its remains. The site is therefore considered to be 'Poor' for its associations.

Summary

6.16 The assessment of value above has identified that the site is of an 'Ordinary' landscape value and has therefore been assessed as being of **Low, local value**.

Landscape Susceptibility

- 6.17 GLVIA3 defines susceptibility to change as: "... the ability of the landscape to 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." (GLVIA3, paragraph 5.40, pages 88 and 89).
- 6.18 The susceptibility of the landscape needs to be determined for the specific proposals. This is important, as it allows the assessment to take account of the local context and how the



6 Implications of Development

proposed development fits within it.

- 6.19 In relation to the susceptibility, based on experience and professional opinion, including that derived from various workshops coordinated by the LI on GLVIA3, the levels of susceptibility for the proposed development have been described as being:
 - **High Susceptibility** The landscape is such that changes in terms of the development proposed would be entirely at odds with the character of the local area, related to matters including pattern, grain, use, scale and mass.
 - Medium Susceptibility The proposed development has a degree of consistency with the existing scale, pattern, grain, land use of the prevailing character, although mitigation may be appropriate to enhance assimilation.
 - Low Susceptibility The development proposed is entirely consistent with the character of the local area, related to matters including pattern, grain, use, scale and mass.
- 6.20 In the case of the proposals, the site is situated within the Green Belt to the north of the settlement edge of Stanmore. The presence of an existing building within the site and existing areas of hardstanding means that the site is already influenced by the presence of built form. The existing mature tree planting found within the site and at its boundaries provides a secluded and contained nature and separates the site from the wider landscape beyond. This tree planting along Brockley Hill also provides a sense of separation from the landscape to the east.
- 6.21 The proposals comprise the redevelopment of the existing club house and area of hardstanding and will result in development being almost entirely on the same footprint of the existing building. Existing car parking and the access into the site is retained and incorporated into the proposals and the scheme proposes to locate the new banqueting facility on the lower slopes in the same location as the existing built form.
- 6.22 Considering the above factors, the receiving landscape is of a Low Susceptibility to the proposed development; coinciding with the published London's Natural Signatures: The London Landscape Framework LCA. The proposals are consistent with the existing development already found on the site, with enhancements to design, material use, layout and landscape features.
- 6.23 Given the limited, low localised value and low susceptibility

of the site and its existing golf course landuse, the receiving landscape has been assessed as being of an overall **Low** sensitivity.

Nature of Change

- 6.24 The effects of any new development need to be considered in light of the existing context and baseline scenario, which in this instance includes the presence of existing areas of built form and areas of hardstanding, as well as the presence of fencing and lighting associated with the golf course and the overall golf course landscape.
- 6.25 The redevelopment of the site will not introduce new built form, and the proposed building will be located on the existing location of the club house building already found on site, with the car parking retained and incorporated into the proposals. The existing access off Brockley Hill is retained and all existing tree planting found at the boundaries and within the site will be retained and incorporated into the proposals.
- 6.26 The introduction of additional characteristic tree planting within the site will assist in increasing characteristic features and softening the new building to assist with integrating it into the wider landscape of the golf course. This proposed tree planting will also assist in softening and filtering glimpsed views from Brockley Hill to the east.
- 6.27 The existing land use of the site, and the current peri-urban characteristics will mean that the development will not be seen as incongruous nor out of context, with the nature of the proposed building, the choice of materials and the design of the scheme improving the visual amenity and appearance of the built form (as detailed in the Design and Access Statement prepared by 5Plus Architects), and integration of the building into the landscape.
- 6.28 Additional tree planting, including oak, birch and hornbeam which is characteristic of the wider landscape can be included within the on-site species mix, along with additional native hedge planting and areas of wildflower meadow planting.

Visual Context

- 6.29 As set out in **Section 4** of this report and illustrated by the representative **Photoviewpoints 1-10**, publicly accessible views are limited and localised. The visual envelope is contained by views from Brockley Hill to the east of the site.
- 6.30 Medium and long distance views are not possible due to the

- presence of mature tree planting and undulating topography found in the wider landscape.
- 6.31 Whilst the proposed development would be visible to users of Brockley Hill, these views are not valued or identified as important views in any way (representative **Photoviewpoint 1** and 3).
- 6.32 There are no views of the site from the important identified view within the Harrow Views Assessment from Wood Farm to the north west of the site (representative **Photoviewpoint 8**). due to the sloping nature of the site and the presence of mature tree planting found within Stanmore Country Park and to the site boundaries.

Visual Receptors

- 6.33 The limited publicly accessible viewpoints are confined to Brockley Hill and the following receptors have been identified:
 - Transient users of Brockley Hill (representative Photoviewpoints 1 and 3);

Sensitivity of Transient users of Brockley Hill

- 6.34 Development of the site will be visible to transient users of Brockley Hill, who already experience glimpsed views of the existing building found within the site through gaps in existing tree planting found along Brockley Hill (representative **Photoviewpoint 1 and 3)**.
- 6.35 The presence of the existing club house building found within the site will mean that perceived changes to the view will be limited (as seen on representative **Photoviewpoint 3 and 4**), with the sight of similarly scaled built form being an established component of the current visual experience. The internal planting on-site will also seek to integrate the building into the landscape and the implementation of new hedgerow planting at the site access will further soften views into the site for passing receptors, whilst the removal of exiting signage at the site boundary will seek to improve the existing visual situation and minimise visual impacts.
- 6.36 The development will have a beneficial effect on the visual amenity of these receptors.



7 Green Belt

Introduction

- 7.1 This assessment has been completed to take account of how the site contributes to the openness, function and purposes of the Green Belt.
- 7.2 The site is Previously Developed Land within the Green Belt, and this assessment therefore identifies opportunities and constraints based on an understanding of the site and how it contributes to the function and purposes of the Green Belt in addition to its role in preserving openness.

National Planning Policy

National Planning Policy Framework

7.3 At paragraph 133, the NPPF sets-out the role of the Green Belt, stating that: "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". The NPPF goes on to define five specific purposes which the Green Belt serves in order to achieve this aim. These are defined at paragraph 134 of the Framework as being:

Aims and Purposes

- 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 and other urban land.
- 7.4 It should be noted that Green Belt is not a landscape designation, and are not defined to provide protection to attractive and / or valued landscapes. However, the NPPF encourages the beneficial use of the Green Belt once designated, stating at paragraph 141 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."

7.5 It is important to understand the distinction between the aims and purposes of the Green Belt as a spatial planning tool that seeks to prevent urban sprawl, and the potential for the beneficial use and enhancement of the Green Belt once designated. The function of the Green Belt is not to protect areas of valued landscape or habitat, nor to facilitate access to and recreational use of land.

Exceptions to Inappropriate Development in the Green Belt

- 7.6 Construction of new buildings within the Green Belt is considered as inappropriate development, which will only be approved in 'Very Special Circumstances'. However, Paragraph 145 states exceptions in which the construction of buildings within the Green Belt may be considered appropriate:
 - "(a) buildings for agriculture and forestry;
 - (c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
 - (d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
 - (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; or
 - -not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority."

Previously Developed Land and Openness of the Green Belt

7.7 The redevelopment of Previously Developed Land, as defined in Green Belt terms is defined by the NPPF as:

"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. When considering the redevelopment of the Green Belt at Paragraph 89 of the NPPF, proposals should not have greater impact on the openness of the Green Belt."
- 7.8 The fundamental aim of the Green Belt is to prevent urban sprawl, by keeping land permanently open. In this term this relates to a lack of development as opposed to the perception of openness accorded to character or visual appearance of an area.

Interim conclusions

- 7.9 In summary, having considered both the national and local policy, the following factors need to be taken into account when drawing-up proposals for the redevelopment of the site. This will ensure that the proposals do not adversely impact upon the openness of the Green Belt or the contribution that the site makes to the purposes:
 - Extent and location of existing buildings and hardstanding (footprint);
 - Volume, mass, heights and scale of existing buildings;
 - Visual openness, including areas containing existing built development, hardstanding and car parking areas, which may contribute to this attribute (this relates to the potential visual impact of development); and
 - Contribution to the five Green Belt purposes.

Green Belt Methodology

- 7.10 There is no published methodology for Green Belt review for development of PDL which is to remain within the Green Belt.
- 7.11 Given that there is no recognised published methodology, this assessment has identified those aspects that are of particular relevance when assessing openness and the location of PDL on the urban edge within the Green Belt.
- 7.12 The extent, volume, massing and heights of buildings needs to be considered when assessing the acceptability of the proposals in Green Belt terms, and this includes the following:
 - Visual openness, including areas containing existing development but which may contribute to this attribute; and



 Contribution to the five Green Belt purposes and the function of the Green Belt.

Scoping of the Green Belt Purposes for the Assessment

- 7.13 In order to inform the assessment of the contribution that the land within the site may make to the purposes of the Green Belt, the role and function of the site area and its context is considered in relation to each of the five Green Belt purposes.
- 7.14 This will enable those purposes which are not relevant (i.e. land which does not contribute to the purposes) to be scoped out.

<u>Purpose 1. To check the unrestricted sprawl of large built-up areas:</u>

7.15 The site is located on land to the north of Stanmore and is separated from the residential edge by the presence of Cleopatra Close Park and areas of planting to the south. There is no physical connection with the site and any built up areas and therefore this purpose is not relevant and has been scoped out of the study.

<u>Purpose 2. To prevent neighbouring towns merging into one</u> another

7.16 The site does not serve to prevent neighbouring towns from merging, with the nearest town of Elstree to the north located some 1.7km away. The well wooded landscape and the presence of the M1, also prevents any merging of neighbouring towns. Due to its scale and location, this purpose is not relevant and has been scoped out.

<u>Purpose 3. To assist in safeguarding the countryside from</u> encroachment

- 7.17 Whilst part of the site falls within Previously Developed Land, this may still play a role in the transition between the undeveloped land of the wider Green Belt.
- 7.18 Other factors that may influence the contribution that the land makes to safeguarding the countryside from encroachment includes the physical and visual separation afforded by boundary vegetation. When considering the contribution that the site makes to this purpose, the following will be considered:
 - The presence of boundaries providing physical and visual separation from the wider countryside and open Green Belt;

- The prominence of existing development on the site and its' relationship with the adjacent undeveloped Green Belt; and
- The prevailing character of the surrounding landscape.
- 7.19 This purpose will be will be relevant to the site and further consideration will be made when assessing its development. It should be noted that some encroachment is already established within the site due to the presence of the existing golf club house, the driving range, fencing, netting and lighting.

<u>Purpose 4. To preserve the setting and special character of historic towns</u>

7.20 The site does not contain any listed buildings, is not classed as an historic town centre and does not make any contribution to this purpose and has therefore been scoped out of this study.

<u>Purpose 5. To assist in urban regeneration, by encouraging the recycling and other urban land.</u>

- 7.21 The site is in D2 use and the proposed scheme would not prevent the recycling of any other derelict or other urban land and therefore this purpose is not relevant and has been scoped out of this study.
- 7.22 Overall, purposes 1,2 4 and 5 have been scoped out of this study and further consideration will be made to purpose 3 and the sites contribution to this purpose.

Assessment of Openness of the Green Belt

7.23 Having considered the policy, context and methodology, this section assesses the contribution that the site makes to the function of the openness of the Green Belt and assesses the various elements and features found within the site and the contribution they make to the openness of the Green Belt.

Hardstanding

7.24 Areas of hard-standing exist which are associated with the car park, access road and driving range (as illustrated on Image 1). These areas of hardstanding are located on the southern part of the site and are limited to the area around the existing building. Glimpsed views of these areas of hardstanding can be seen from the entrance into the site, and reduce the sense of openness.



Image 1: Areas of hardstanding associated with the existing building

7.25 The club house has two 'wing' structures which extend to the east and west away from the main hub of the golf course club house (as illustrated on **Image 2** below).



Image 2: Existing building as viewed from the upper slopes of the site
7.26 The open nature of the site and the exposed edge of the existing building when viewed from the upper slopes within the site itself impacts on the openness of the Green Belt as well as the presence of fencing, netting and lighting seen in the wider golf course. Walling and timber fencing found around the existing club house building all add top the developed nature of the southern part of the site as illustrated on Image 3 below and reduce the openness of the site.



Image 3: Brick walls and timber fencing associated with the building



Internal Landscape Features

- 7.27 To the south of the existing building and car parking are a belt of trees which provide a level of containment and somewhat separate the site and the building from the rest of the golf course to the south.
- 7.28 Internal tree planting also exists within the car park, and this assists in reducing the openness and reducing the visual impact of the building when viewed from the south and east as illustrated on **Image 4** below.



Image 4: Internal planting to car park

7.29 Hedge planting found to the edge of the car park also assists in separating the site from the land to the south. The wider land to the north of the existing building within the golf course contains some areas of tree planting and these are found predominantly to the northern and western edges, with most of the golf course open and devoid of landscape features.

Boundary Planting

- 7.30 Mature tree planting is found to the eastern, northern and western boundaries of the site. Planting to the north and east found at Stanmore Country Park and Pear Wood reduces openness and separates the site from the wider land to the north and east and the wider Green Belt.
- 7.31 The linear mature tree planting found along Brockley Hill at the eastern boundary (**Image 5**) also provides a level of containment and separates the site from the wider landscape, reducing the transition and relationship with the more rural land to the east.



Image 5: Planting found along Brockley Hill

Visual Openness, including areas containing existing development

- 7.32 The presence of the existing club house on the site, along with the presence of netting and lighting associated with the golf course serves to limit the sense of openness within the Green Belt.
- 7.33 Internally the existing built form and its mass, combined with the presence of tree planting provides a confined and enclosed character from the south, and from the east.
- 7.34 From the north the site is more open, although the presence of mature tree planting reduces openness and limits views from the wider landscape to the north and east. From the higher ground within the site, the built form is evident and the building is a clear structure within the landscape.
- 7.35 Visually, the existing built form on the site reduces the sense of openness and provides a developed character.

Assessment of Contribution to Green Belt Purposes

7.36 As already identified, the site does not contribute to Purpose 1, 2, 4 and 5 of the Green Belt. The contribution that the site makes to Purpose 3 is further explored below:

<u>Purpose 3 - To assist in safeguarding the countryside from encroachment</u>

7.37 Retention of the built form at the existing location and on the majority of the existing footprints will ensure that encroachment into the countryside is reduced. The presence of existing planting 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. Internally the

additional planting and a bund to the north of the building will limit further encroachment within the site itself, and contained development on the existing footprints will prevent additional countryside encroachment. For these reasons the site makes a limited contribution to this purpose.

Recommendations for development in Green Belt Terms

7.38 Having undertaken an appraisal of the openness of the site and the contribution that it makes to the Green Belt purposes, this section identifies how the redevelopment of the site may be implemented in order to maintain the openness and, where possible provide enhancements to the existing baseline conditions.

Extent and location of existing buildings and hardstanding (footprint)

7.39 Existing buildings within the site are contained to the southern part of the site, with areas of hardstanding and car parking surrounding the existing built form. The access into the site off Brockley Road should be retained and the overall development contained on the existing footprint, with the existing hardstanding incorporated into the scheme

Volume, mass, heights and scale of the proposed buildings

- 7.40 The removal of the 'wings' of the building and replacement with a more compact building will reduce the impacts on openness. Ensuring that the proposed building is no higher than the existing building and sitting below the existing skyline and underneath the tree line will also reduce the potential impacts.
- 7.41 In reducing the sprawling form and massing across the site, the built form will be contained on a more compact footprint and will reduce the perception of the physical mass of built form within the site.

Visual Openness, including areas containing existing development

- 7.42 There are opportunities to increase areas of tree planting along the southern boundary of the site and this will provide additional soft edges and a transition to the wider landscape.
- 7.43 The additional tree planting and bund to the north of the site will also improve the existing situation and provide a better transition and integration of the scheme to the wider undeveloped land.



Contribution to Green Belt Purposes

- 7.44 As identified, the site makes a limited contribution to the Green Belt purposes. In order to preserve the contribution that the existing landscape features make to the character and to respect the openness of the Green Belt, the redevelopment of the site should respond to the existing context through the following measures:
 - Development should be contained to the existing building footprints;
 - Removal of netting and fencing associated with the golf course;
 - Retention of existing landscape structures and features along all boundaries;
 - Retention of internal evergreen tree planting and hedging to car park;
 - Additional planting to the north of the proposed building to soften its appearance when viewed from the higher slopes of the site; and
 - Retention of undeveloped areas within the site with opportunities for additional characteristic planting, new areas of tree planting and additional ecological habitats.

Assessment of Proposals

- 7.45 The layout of the proposed development has evolved to respond to the context of the site and its location within the Green Belt. This has taken into account the opportunities, constraints and identified recommendations.
- 7.46 The details of the design rationale and development are included within the Design and Access Statement prepared by 5Plus and have been informed by an iterative process working with Harrow Borough Council, the design team and the client. Agreement was gained with Harrow Council to a compact scheme with no more than a 30% increase in footprint. Further details on the massing, footprint, height and floorspace are found within the Design and Access Statement prepared by 5Plus Architects.
- 7.47 The Proposed Landscape Strategy Plan (Plan 9) found within Section 5 of this report shows the layout of the proposals, as well as the retained boundary planting found to the north, east and west, and illustrates how the proposed landscaping and additional tree planting assimilates the proposed building into the

- landscape to improve the existing situation and limit impacts on the openness of the Green Belt.
- 7.48 Building on this assessment, and the contribution that the site makes to the Green Belt, the development and design of the proposals have responded in the following ways with regard to reducing the impact on openness:

Location of development

7.49 The proposals limit development to within the southern part of the site and reflects the areas containing the existing buildings and hardstanding, allowing for the retention of the existing undeveloped wider golf course and boundary planting. The existing access point off Brockley Hill has been retained and incorporated into the proposals.

Extent and location of buildings and hardstanding (footprint)

7.50 The proposals have retained development on the existing building footprints where possible. The existing 'wings' of the building have been replaced with a more compact and centralised proposed building, as illustrated on the attached extract from 5Plus:



Image 6: Proposed and existing building as seen from the upper slopes

Building Volume

7.51 The proposals represent an overall increase in building volumes in agreement with Harrow Borough Council, and this volume increase will form part of a more compact scheme.

Mass, height and scale of buildings

7.52 The development of the site will see the existing building removed and replaced with lower overall building height. The

proposed building will remain below the tree line skyline, and will not extend above the skyline.

Visual openness

- 7.53 The proposals have responded to the openness of the Green Belt in several ways. As already set-out above, when considering the layout, location, massing and extent of development, the proposed redevelopment of the site will be retained almost entirely on the existing footprint of the site.
- 7.54 The proposals incorporate additional native tree planting which soften the appearance of the building, reducing the impact on openness and assisting with integrating the building into the landscape.
- 7.55 Retention of existing tree planting along Brockley Hill will ensure that the proposals remain separate from the wider more open Green Belt land to the east and this boundary planting will reduce the visual impact of the proposed development.
- 7.56 It is accepted that there will be a change to the built form within the site, but that the design of the scheme and proposed landscaping will be beneficial and reduce the impact on the openness of the Green Belt.

Contribution to Green Belt Purpose 3

- 7.57 All of the above measures combine to limit any potential impacts of the proposals upon the third Green Belt purpose 'to assist in safeguarding the countryside from encroachment'.
- 7.58 The layout, scale, massing and height of the proposed development limits any visual impacts and potential for the new development to encroach upon land within the wider Green Belt.
- 7.59 The proposals retain development at the existing building footprint, and although slightly larger the proposals result in a more compact and centralised scheme and layout.
- 7.60 The provision of a new planted bund to the north of the on-site building will serve to further screen the site from the undeveloped landscape north of the site to provide an improved integration of built form into the surrounding elevated landscape beyond the site to the north. The additional landscape framework across the site will reduce the potential potential for encroachment to the countryside.



Summary

- 7.61 This Green Belt Assessment has considered the site in relation to the contribution to the openness and the five purposes of the Green belt as set out within the NPPF, and has provided recommendations that have informed its redevelopment.
- 7.62 The site makes a limited contribution to the Green Belt purposes. In particular it makes a limited contribution to Purpose 3, with the proposed development located within the extents of existing development and the presence of existing boundary planting separating the site from the wider Green Belt land to the east.
- 7.63 The location of the site also separates it from the existing built edge of Stanmore to the south. As considered earlier, the remaining four Green Belt purposes are not applicable to the site and its location.
- 7.64 The development of the site is concentrated on and around the location of the existing building, and on almost the entirety of the existing footprints of built form and areas of hardstanding.
- 7.65 It is accepted that there will be an increase in the volume of the proposed building, which is in agreement with Harrow Borough Council, and the proposals will see a decrease in overall height of the building.
- 7.66 As indicated, although an increase in volume the scheme proposes a more compact approach to the design of the building and locates it on the existing footprints and location of the existing built form, with the existing extending 'wings' of the building removed.
- 7.67 This assessment demonstrates that the proposed redevelopment at Brockley Golf Course the demolition of existing golf club buildings (Use Class D2) and construction of a new banqueting facility (Use Class D2), widening of existing vehicular access from Brockley Hill, car and cycle parking, waste / recycling storage, landscape enhancements and associated works does not result in a greater impact on the openness of the Green Belt than the existing situation.

8 Summary

Summary and Conclusion

- 8.1 The proposals have considered both national and local policy, and the local policy accords with the following planning policies found within the adopted Harrow Core Strategy.
 - Core Policy CS 7 Stanmore & Harrow Weald -as identified the development of the site will not impact on the identified views within the Harrow Views Assessment, or impact on its spacial characteristics.
 - Policy DM1 Achieving a High Standard of Development the ongoing iterative pre application process has provided a scheme proposal which is of a high standard of development, and improves the existing condition and current built form within the site.
 - Policy DM6 Areas of Special Character The Harrow Weald Ridge Area of Special Character has been considered in he proposals, and the scheme incorporates the characteristic well treed backdrop of this key special area into the scheme. The location of the proposed development on the lower slopes respects the higher slopes and sensitivities associated with the area of special character.
 - Policy DM12 Sustainable Design & Layout the proposed building has been carefully designed and considered to be integrated with the wider landscape through its use of materials, and proposed landscape treatments. The retention of the existing car parking will be sustainable and this has been integrated into the layout, with retained trees, boundary planting and proposed additional tree planting and associated landscaping assisting with a sustainable approach to the scheme.
 - Policy DM16 Maintaining the Openness of the Green Belt and Metropolitan Open Land. The proposed building is to be retained on the footprint of the existing building and the retention of boundary planting as well as proposed additional internal tree planting will be beneficial and will reduce the impact on openness within the Green Belt. The impacts on openness will be no greater than the existing situation, and proposed landscaping will provide additional benefits as discussed below.
 - Policy DM17 Beneficial Use of the Green Belt and Metropolitan Open Land. The wider retained undeveloped land on-site has been improved through the removal of detracting features such as lighting and netting, and

- proposed additional enhancements to pedestrian connections and landscape features provide additional benefits in terms of enhancements to the Green Belt. This will include ecological enhancements within the site.
- Policy DM22 Trees and Landscaping. All existing trees within the development have been retained and incorporated into the proposals. With additional characteristic tree planting proposed and integrated into the scheme.
- 8.2 The proposals will redevelop the site within the existing landscape framework with an approach which will not cause undue harm to the openness and context of the Green Belt and the wider landscape. The development location, design and footprints have been considered in relation to the landscape and visual opportunities and constraints to development and there will not be undue harm to the openness of the Green Belt any more than the existing condition and development found within the site.
- 8.3 All landscape features found on the site will be retained and enhanced, with boundary planting retained and additional characteristic landscape features proposed to increase habitats and the overall landscape framework.
- 8.4 The proposals will improve with the appearance and amenity of the previously developed land, with a more sensitive approach to the use of materials and a removal of some elements of built form, such as netting and lighting associated with the golf driving range.
- 8.5 The visual implications of development will impact on short distance views only, and will be localised, and additional internal tree planting will filter these views and soften views of the building with no undue harm to visual amenity.
- 8.6 Overall, it is concluded that only local effects will arise and that whilst transient users of Brockley Hill will experience a change in views and amenity at close proximity; the indicative masterplan demonstrates that the redevelopment of the site on the same footprint will result in beneficial changes to views with additional characteristic planting further softening the proposed building.
- 8.7 The scheme has responded in a sensitive way to the surrounding context and landscape character and visual amenity and can be integrated successfully into the landscape without undue harm on the openness of the Green Belt.



Appendix 7.1 Landscape and Visual Impact Assessment Methodology summary of Approach and Criteria Tables

The key terms used within assessments are:

- Susceptibility and Value Which contribute to Sensitivity;
- Scale, Geographical Extent, Duration and Reversibility which contribute to the Magnitude of change; and
- Significance of Effect a judgement of the level of significance of effect when Sensitivity and Magnitude are combined.

Sensitivity

Overall sensitivity lies along a continuum of low to high. The Value and Susceptibility of a receptor are both considered understanding its overall sensitivity.

Susceptibility is assessed for both landscape receptors including, landscape character areas, and for visual receptors (people). It indicates the ability of a defined landscape or visual 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." (GLVIA, 3rd version, para 5.40). An example of how Susceptibility can be described at each end of the continuum of low to high is provided in the following tables 8.A and 8.B for both landscape and visual receptors.

Landscape **Value** is "the relative value that is attached to different landscapes by society" (GLVIA, 3rd version, page 157). Box 5.1 (GLVIA 3rd version, page 84) sets out factors to be considered in the identification of valued landscapes. These can be broadly described as: Landscapes recognised and valued for their quality and and/or cultural associations; key characteristics and features as recognised in published landscape character assessments; Landscape constriction and the degree to which the landscape is intact and legible. An example of how Value can be described at each end of the continuum of low to high is provided in the following table 8.A for landscape receptors. In visual terms, Value relates to that attached to views experienced by receptors (people). An example of how Value can be described at each end of the continuum of low to high is provided below for visual receptors in the following table 8.B

Magnitude of Change

Overall magnitude of change lies along a continuum of low to high. Together the Scale, Geographical Extent, and Duration and Reversibility of effect are all considered in understanding the overall Magnitude of change.

Scale of effect is assessed for both landscape and visual receptors and identifies the degree of change which would arise from the development. An example of how Scale of effect can be described at each end of the continuum of low to high is provided in the following tables 8.C and 8.D for both landscape and visual receptors.

Geographical Extent of effect of is assessed for both landscape and visual receptors and indicates the geographic area over which the effects will be felt. An example of how Geographical Extent can be described at each end of the continuum of low to high is provided in the following tables 8.C and 8.D for both landscape and visual receptors.

Duration and Reversibility of effect is assessed for all landscape and visual receptors and identifies the time period over which the change to the receptor would arise as a result of the development. An example of how Duration and Reversibility can be described at each end of the continuum of low to high is provided in the following tables 8.C and 8.D for both landscape and visual receptors.

Significance of Effect

Best practice guidelines stipulate that the significance of any landscape related impact should be evaluated, both during the construction works and following completion of the development. The significance of any landscape and visual effect is a function of the sensitivity of the affected landscape resources and visual receptors against the magnitude of change that they would experience. As such, the assessment of potential and residual effects can be described as: negligible, minor, moderate, moderate-major and major. A description of these are described in the following table 8.E

The following terms will be used to define residual landscape/townscape effects:

Adverse: the proposed development may result in direct loss of physical landscape/townscape resources, weaken key characteristics or negatively affect the integrity of a landscape/townscape designation; and

Beneficial: the proposed development may replace poor quality elements of the existing landscape/townscape or strengthen existing landscape/townscape characteristics.

The following terms have been used to define residual visual effects:

Adverse: the proposed development reduces visual amenity; and

Beneficial: the visual amenity is improved by the proposed development.

Table 7.A Sensitivity of Receptors: Landscape/Townscape Receptors

As set out below, the Sensitivity lies along a continuum of low to high. The Value and Susceptibility of a receptor are both considered in understanding its overall Sensitivity.

		Landscape Value		Landscape Susceptibility	
	Designations and Conservation Interests/Associations Landscapes recognised and valued for their quality and / or cultural associations / recreational value	Key Characteristics and Features As recognised in published Landscape Character Assessments or policy	Landscape Condition Degree to which the landscape is intact and legible & its scenic quality	The ability of a defined landscape to accommodate the specific proposed development without undue negative consequences	
High	National / Regional Importance (e.g. AONB, National Park, Registered Parks and Gardens)	Features which are dominant within the landscape and are fundamental to defining the distinct landscape character of an area. Important characteristics and features recognised as forming intrinsic part of nationally and regionally designated landscapes. Distinctive individual or rare features.	Distinct landscape structure with strong pattern and intact features. Few detractors or uncharacteristic features or elements present.	The landscape is such that changes in terms of the proposed development would be entirely at odds with the character of the local area, related to matters including pattern, grain, use, scale and mass.	
	Local importance (e.g. Conservation Areas, Special Landscape Areas / Features)	Locally important and notable features that contribute to the overall character of an area. Features and elements protected by local policy.		The proposed development has a degree of consistency with the existing scale, pattern, grain, land use of the prevailing character.	
Low	No Designation	Features or elements that are uncharacteristic and detract from the landscape character of an area.	Degraded landscape structure with fragmented pattern and poor legibility of character. Detracting features notable within the landscape.	The proposed development is entirely consistent with the character of the local area, related to matters including pattern, grain, use, scale and mass.	

e.g. Medium - Landscape Character Area does not include a designation but includes important characteristics and features that create a distinct landscape structure with strong pattern and intact features. The proposed development has a degree of consistency with the existing scale, pattern, grain, land use of the prevailing character, although mitigation may be appropriate to enhance assimilation.

Table 7.B Sensitivity of Receptors: Visual Receptors

As set out below, the Sensitivity lies along a continuum of low to high. The Value and Susceptibility of a receptor are both considered understanding its overall Sensitivity.

8	Value (attached to views)	Visual Susceptibility (Occupation and activity of users)
High	Recognised national / Important Viewpoints, including those identified within and protected by policy.	Residential properties - views from rooms occupied during daylight / waking hours (predominantly ground floor rooms).
	These viewpoints may be tourist destinations and marked on maps. Designed views, including from within historic landscapes. Users of nationally recognized routes e.g. National Cycle Network, National Trails. Land with public access (i.e. Open Access Land and National Trust Land).	Users of Public Rights of Way, cycle routes and Recreational Trails where the views are focused on the landscape Observers whose attention or interest may be focused on the landscape and recognised or protected views in particular.
	Locally important view/views. Views from within locally designated landscapes e.g. Conservation	Residential properties - views from rooms unoccupied during daylight / waking hours (1st floor rooms). Temporary Residential Properties such as Hotels, Hospitals, Prisons - with views of the
	Areas and local planning policy. Views from local routes identified on maps	development Users of Public Rights of Way, cycle routes and Recreational Trails where the views are not focused solely on the landscape (i.e routes passing along pavements of roads).
		Those playing or spectating at outdoor sports or undertaking formal outdoor recreation. Users of local roads where there are clear / open views across the landscape and low levels of traffic.
1	No designations present	Views of the landscape are part of, but not the sole purpose of the receptors' activities.
	Permissive routes, not recognised by policy or identified on maps.	Users of main roads travelling at speed, or local roads where the focus is upon the road ahead owing to traffic conditions and the context / composition of views.
Low		Places of work where attention is not focused on the landscape. Attention is focused upon the activity of the receptor and not upon the wider views.

e.g. Medium - views of the landscape are part of, but not the sole purpose of the receptors activities along local routes.

Table 7.C Magnitude of Change: Landscape/Townscape Receptors

As set out below, magnitude of change lies along a continuum of low to high. Together the Scale, Geographical extent, and Duration and Reversibility of effect are all considered in understanding the overall magnitude of change.

	Scale	Geographical Extent	Duration and Reversibility	
	identifies the degree of change which would arise from the development	of effect indicates the geographic area over which the effects will be felt	of effect identifies the time period over which the change to the receptor would arise as a result of the development.	
High				
	Highly noticeable change, affecting most key characteristics and dominating the experience of the Landscape/Townscape; introduction of highly conspicuous new development; and the baseline situation will be fundamentally changed.	Extensive affecting the majority or all the Landscape/Townscape Character Area.	Long-term or permanent, the change is expected to be in place for 10+ years and there may be no intention for it to be reversed or only partially reversed.	
	Partial alteration to key elements, features, qualities or characteristics, such that post development the baseline situation will be largely unchanged but noticeable despite discernible differences.	Localised, affecting the site and a proportion of the wider Landscape/Townscape Character Area.	Medium-term, the change is expected to be in place for 5-10 years and the effects may be reversed or partially reversed.	
Low	Minor alteration to few elements, features qualities or characteristics resulting in a barely perceptible change.	Affecting the site and immediate setting only.	Short-term, the change is expected to be in place for 0-5 years and the effects are likely to be reversed.	

e.g. Medium - Highly noticeable change with introduction of highly conspicuous development which will affect the site and a proportion of the character area for a short-term during construction. The effects are likely to be reversed.

Table 7.D Magnitude of Change: Visual Receptors

As set out below, magnitude of change lies along a continuum of low to high. Together the Scale, Geographical extent, and Duration and Reversibility of effect are all considered in understanding the overall magnitude of change.

	Scale	Geographical Extent	Duration and Reversibility	
	identifies the degree of change which would arise from the development	Wide, and/or within close proximity, and/or open views.	identifies the time period over which the change to the receptor would arise as a result of the development.	
High	Intensive/dominant or major alteration to key elements of the baseline view.	Extensive, open and/or close proximity, and/or direct and/or affecting unscreened views.	Long-term or permanent, the change is expected to be in place for 10+ years and/ or there may be no intention for it to be reversed or only partially reversed.	
	Partial/noticeable or minor alteration to key elements of the baseline view.	Framed, and/or contained, and/or medium distance, and/or partially screened views.	Medium-term, the change is expected to be in place for 5-10 years and/ or the effects may be reversed or partially reversed.	
Low	Minor alteration to few elements of the baseline view.	Narrow, and/or fragmented, and/or long distance, and/or heavily screened views.	Short-term, the change is expected to be in place for 0-5 years and/ or the effects are likely to be reversed.	

e.g. Medium – Intensive and major alteration to key elements of the framed baseline view over a medium distance for a short period of time during construction. The effects are likely to be reversible.

Table 7.E Level of Significance Effect

	Major beneficial:	The development would fit well with the scale, landform and pattern of the landscape and bring substantial enhancements. The development would create a major improvement in views;
	Moderate-Major beneficial:	The development would fit well with the scale, landform and pattern of the landscape, and enhance the existing landscape character. The development would create a highly improved change in the view;
	Moderate beneficial:	The development would fit well with the scale, landform and pattern of the landscape, maintain and/or enhance the existing landscape character. The development would create a noticeable but improved change in the view;
	Minor beneficial:	The development would complement the scale, landform and pattern of the landscape, whilst maintaining the existing character. The development would result in minor improvements to the existing views;
	Negligible:	The development would cause very limited changes to the landscape and/or views but creates no significant effects; the development would create neither a adverse or beneficial change to the landscape or visual receptor;
	Minor adverse:	The development would cause minor permanent and/or temporary loss or alteration to one or more key elements or features of the landscape, to include the introduction of elements that may not be uncharacteristic of the surrounding landscape. The development would cause limited visual change;
	Moderate adverse:	The development would cause substantial permanent loss or alteration to one or more key elements of the landscape, to include the introduction of elements that are prominent but may not be substantially uncharacteristic with the surrounding landscape. The development would be clearly visible and would result in adverse effects;
	Moderate-Major adverse:	The development would cause total permanent loss or major alteration to key elements and features of the landscape, to include the introduction of elements totally uncharacteristic of the surrounding landscape. The development would be visually intrusive and would disrupt views both into and across the area; and
	Major adverse:	The development would damage, degrade or badly diminish landscape character features, elements and their setting. The development would be visually intrusive and would disrupt fine and valued views both into and across the area.

Landscape/Townscape or visual effects above moderate (i.e. Major or Moderate- Major) are considered to be significant; all other effects are considered not significant.

Appendix 2 - National Planning Policy

National Planning Policy Framework

The National Planning Policy Framework (NPPF) outlines the Government's planning policies for England, setting out how these are expected to be applied. The NPPF is a material consideration in planning decisions and any development would need to accord with the following planning provisions.

At the heart of the NPPF is a presumption in favour of sustainable development. The NPPF sets out three dimensions to sustainable development: economic, social and environmental. For plan making, this means that local planning authorities "should positively seek opportunities to meet the development needs for their area", with sufficient flexibility to adapt to rapid change unless any adverse impact of doing so would significantly and demonstrably outweigh the benefits when assessed against NPPF policies.

For decision making, development that accords with a current development plan should be approved without delay; and the NPPF states at paragraph 11 that:

"where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

At footnote 6 of paragraph 11, examples of the types of designated areas and assets referred to at paragraph 11, i). are listed as:

- Sites of Special Scientific Interest (SSSI);
- Green Belt:
- Local Green Space;
- Areas of Outstanding Natural Beauty (AONB);
- Heritage Coasts;
- Irreplaceable Habitats
- National Parks;

- Designated Heritage Assets; and
- · Areas at Risk of Flooding or Coastal Erosion.

The site as identified falls within the Green Belt.

Strategic Policies (Para. 20)

The revised NPPF continues to promote the provision of new development in line with a positive presumption in favour of 'sustainable development'. Against that baseline, strategic policy criterion 'd' refers to the "conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation".

The application scheme should address that strategic aim through a sensitive development response with the following in mind; conservation and enhancement of landscape features, removal of incongruent elements and the long-term management of the boundary Green Infrastructure.

Achieving Well-Designed Places (Para. 127)

Whilst design standards are ultimately controlled in detail through the discharge of planning conditions (and scheme elements are not diminished at that stage, which is now enforced at para. 130 of the NPPF), criterion 'b' requires developments to be "visually attractive as a result of good architecture, layout and appropriate and effective landscaping".

The current character and condition of the site is influenced by its previous use as a golf course, and its enclosure within a residential urban area. The proposals should offer opportunities to deliver the sustainable use of development land, alongside the retention, protection and management of as much of the onsite vegetation as possible. It is worth bearing in mind that the existing vegetation is not characteristic of the wider landscape beyond the residential area with the site being a golf course, but nevertheless that it can provide a level of maturity and filtering of views where it can be retained. In conjunction with retaining some internal planting where feasible, the key landscaping recommendations for a site such as this (notwithstanding advice on ecological and arboricultural matters) are to retain existing boundary vegetation primarily and to focus on a new scheme of soft landscaping across the site in association with new development.

Criterion 'c' also sets out to ensure that developments "are

sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)". The proposals should respect the existing character of the site, and this will be explored later in this chapter.

Conserving and enhancing the Natural Environment (Paras. 170, 171-172)

The site and its immediate surroundings do not represent a 'valued landscape' in the context of paragraph 170 of the NPPF – more detailed analysis of how this judgement has been made is set out later in this chapter. Furthermore, in terms of the recognised hierarchy of international to locally designated Sites (Para. 171) and the greater weight to be applied to conserving and enhancing the top tier of protected landscapes (Para. 172), the site falls outside of such classifications – it is subject to a Green Belt designation currently but the Council has already confirmed its intention to extend development into the site area through the draft safeguarded land policy for the site which is currently under consultation. Despite the sites current usage by members of the public for recreational use, in landscape and visual terms, it remains at the lower end of any hierarchy and represents no more than an ordinary manmade landscape within heavily urbanised surroundings.

National Planning Practice Guidance

Reference to relevant NPPG is provided below.

Natural Environment PPG, July 2019

Landscape

The PPG makes reference to the National Planning Policy Framework, stating: "it is clear that plans should recognise the intrinsic character and beauty of the countryside, and that strategic policies should provide for the conservation and enhancement of landscapes". The PPG also goes on to state, "the cumulative impacts of development on the landscape need to be considered carefully" (Paragraph: 036 Reference ID: 8-036-20190721, Revision date: 21 July 2019).

Green Infrastructure

The PPG highlights the multifaceted benefits provided through the provision of Green Infrastructure, including but not limited to: "enhanced well-being, outdoor recreation and access,

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enhanced biodiversity and landscapes, urban cooling, and the management of flood risk" (Paragraph: 005 Reference ID: 8-005-20190721, Revision date: 21 July 2019).

Moreover, the NPPG recognises how green infrastructure exists within a wider landscape context and can thus be used to reinforce and enhance local landscape character and contribute to a sense of place.

Design PPG, October 2019

The PPG confirms well-designed places can be achieved by taking a proactive and collaborative approach at all stages of the planning process, from policy and plan formulation through to the determination of planning applications and the post approval stage. Good design is set out in the National Design Guide as comprising of 10 characteristic including context, identity, nature and public spaces (Paragraph: 001 Reference ID: 26-001-20191001, revision date 01 10 2019).

In confirming the role of parameter plans in achieving well designed places, the guidance confirms parameter plans can include information on the proposed land use, building heights, areas of potential built development, structure of landscape and green infrastructure, access and movement and other key structuring and place-making components (Paragraph: 011 Reference ID: 26-011-20191001, revision date 01 10 2019).

National Design Guide, October 2019

The introduction of the National Design Guide confirms that a place is more complex and multi-faceted than a building as it comprises of a number of components including being made up of buildings, landscape and infrastructure which are likely to ensure longer than buildings themselves. In addition, the beauty of a place may range from a long view down to the details of a building or a landscape.

The National Design Guide addresses how to recognise well designed places by outlining the Governments priorities for well-designed places in the form of ten characteristics. It is based on national planning policy, practice guidance and objectives for good design set out in the NPPF 2019.

Hard and soft landscape are identified as key components of good design. Paragraph 21 clarifies that a well design place is unlikely to be achieved by focusing only on the appearance, materials and detailing of buildings and includes making right choices at all levels on a number of components including the

layout, form and scale of buildings and landscape.

Paragraph 28 defines landscape as:

"Landscape is the treatment of land (other than buildings) for the purpose of enhancing or protecting the amenities of the site, the area in which it is situated and the natural environment. Landscape includes landform and drainage, hard landscape such as surfacing, boundary treatments, street furniture and play equipment. It also includes soft landscape – trees, shrubs and other planting."

Whilst paragraph 29 confirms that the materials used for a building or landscape affect how well it functions and lasts over time. In considering context, it is necessary for development to understand and relate well to the site, its local and wider context which includes landscape character. Paragraph 42 sets out that well-designed new development is integrated into its wider surroundings physically, socially and visually. It is based on an understanding of the existing situation which includes:

- "the landscape character and how places or developments sit within the landscape, to influence the siting of new development and how natural features are retained or incorporated into it; and
- "public spaces, including their characteristic design and details, both hard and soft."

In terms of identity, paragraph 49 confirms that the identity or character of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine together and how people experience them. It is therefore necessary for new development to be influenced by an appreciation and understand of land amongst other criteria. This also includes consideration of hard landscape, soft landscape setting and backdrop as outlined by paragraph 52.

Well-designed places contribute to local distinctiveness and this may include using local building, landscape or topographical features, materials or planting types amongst others to create a positive and coherent identity that residents and local communities can identify with. Paragraph 57 states that character starts to be determined by the siting of development in the wider landscape, then by layout, landscape and spaces, movement network and arrangement of development blocks.

In considering movement, in particular a clear structure and hierarchy of connected streets, paragraph 83 identifies that well-designed streets create attractive public spaces with character through their layout and landscape, including street trees, lighting, street furniture and materials. Whilst paragraph 86 states that well-designed parking should be attractive, well landscaped and sensitively integrated into the built form so that it does not dominate the street scene, it also states that:

"It incorporates green infrastructure, including trees, to soften the visual impact of cars, help improve air quality and contribute to biodiversity. Its arrangement and positioning relative to buildings limit its impacts, whilst ensuring it is secure and overlooked."

Nature is an identified design characteristic. The first objective for the nature characteristic is for development to provide high quality, green open spaces with a variety of landscape and activities including play. Paragraph 92 sets out a series of criteria to take account of for well-designed places to provide usable green spaces, including:

The wider and local context, including existing landscape and ecology;

- Access;
- · How spaces are connected;
- The balance between public and private open spaces;
- Their potential to contribute to a strategic green infrastructure system, and to water management;
- Their ability to support a range of activities and provide amenity value, and
- · How they are to be managed and maintained.

The guidance also includes detail relating to public open space. In terms of landscape, public open space should include a variety of natural and designed landscapes for everyone, with different functions to suit a diverse range of needs as outlined at paragraph 94.

The second objective relating to nature concerns improving and enhancing water quality where paragraph 96 states:

"...In well-designed places, water features form part of an integrated system of landscape, biodiversity and drainage. This includes new water features that manage drainage and also existing watercourses. Together with green and brown roofs, swales, rain gardens, rain capture and other drainage, water features create multifunctional 'green' sustainable

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drainage systems. They also enhance the attractiveness of open spaces and provide opportunities for play, interaction and relaxation."

Public Open Space is also a defined design characteristic. In creating well located, high quality and attractive public spaces the design of landscape is considered to influence the micro climate and can promote tranquillity as outlined at paragraph 103.

Appendix 3 - Memory Point Plan

