

**PROOF OF EVIDENCE OF MARK FLATMAN:
LANDSCAPE AND VISUAL ISSUES**

ON BEHALF OF:
AURORA PROPERTIES (UK) LTD

IN RESPECT OF AN APPEAL FOR:
LAND TO THE NORTH OF BRADMORE WAY, BROOKMANS PARK, HERTFORDSHIRE.

PINS REFS: APP/C1950/W/22/3307844
LPA: Welwyn Hatfield Borough Council
LPA REF: 6/2022/1097/OUTLINE

January 2023

Prepared by: **Mark Flatman**

Position: **Director**

Qualifications: **Chartered Landscape Architect
CMLI, Dip LA (Hons), BA (Hons)**

File name: **1573 A4 Brookmans Park PoE 2023 01 06.docx**

Date issued: **6th January 2023**

CONTENTS

1	INTRODUCTION	I
1.1	Qualifications and Experience	1
1.2	Background to the Appeal and Scope of Evidence	2
2	POLICY CONTEXT	5
2.1	Introduction	5
2.2	National Planning Policy Framework (NPPF)	5
2.3	Local Plan (2005) and Proposed Submission Local Plan (2016)	9
2.4	Published Landscape Character Assessments	11
3	LANDSCAPE AND VISUAL ISSUES	17
3.1	The Site, context and its contribution to Landscape Character	17
3.2	Landscape Value, Susceptibility and Sensitivity to change	20
3.3	Proposed Landscape Strategy, Mitigation and Enhancement	24
3.4	Summary of Landscape Issues and Effects	28
3.5	Summary of Visual Effects	33
4	SUMMARY OF PROOF AND CONCLUSIONS	44
4.1	Summary and Conclusions	44

APPENDICES:

APPENDIX A MF FIGURES MF1 – MF6

APPENDIX B LANDSCAPE MASTERPLAN 01

APPENDIX C LVIA METHODOLOGY

1 INTRODUCTION

1.1 Qualifications and Experience

1.1.1 My name is Mark Flatman. I am a Chartered Landscape Architect and a Director of Liz Lake Associates, Chartered Landscape Architects and Urban Designers (LLA). I have a degree and a Diploma in Landscape Architecture from Greenwich University and I am a Chartered Member of the Landscape Institute (CMLI).

1.1.2 I have worked in professional practice since 1996. During this time, I have prepared landscape proposals for a wide range of projects including private landowners, historic landscapes, and educational, commercial and residential developments in town, settlement fringe and rural settings.

1.1.3 I have prepared Landscape and Visual Impact Assessments (LVIAs) to accompany planning applications for broad a range of projects including residential, health, leisure and recreation, commercial, industrial and enabling development. I have also prepared the landscape and visual assessments required for the Environmental Impact Assessments for major infrastructure projects, minerals and waste development, as well as residential and commercial developments.

1.1.4 My experience extends to acting for a wide range of private clients, developers and landowners, including appearances at hearings, Examinations in Public and numerous Inquiries. I also act as Landscape Officer on behalf of a number of Local Authority clients, including this authority Welwyn Hatfield Borough Council, as well as South Norfolk District Council, Suffolk County Council, Suffolk Coastal District Council, South Cambridgeshire District Council, Cambridgeshire County Council, Tendring District Council, West Berkshire Council, Amber Valley District Council and Chelmsford City Council. That role includes a mixture of planning application input and peer reviews, evidence base studies on landscape and visual matters, together with Green Belt topics, as well as acting as an expert witness at Public Inquiry.

1.1.5 Liz Lake Associates is a multi-disciplinary environmental and design consultancy with over 30 years' experience of master planning, landscape planning, landscape

architecture, urban design, heritage and environmental impact assessment. The company is a registered practice of the Landscape Institute.

1.1.6 Following refusal of the application dated 5th August 2022 (ref: 6/2022/ 1097/ OUTLINE), I was retained by Aurora Properties (UK) Ltd to assist at this Inquiry and prepare Evidence in respect of the Landscape and Visual Issues associated with this Appeal.

1.1.7 I declare that the evidence which I have prepared and provide for this Inquiry in this Proof of Evidence is true. It has been prepared and is given in accordance with the guidance of the Landscape Institute. I confirm that the opinions expressed are my true and professional opinions.

1.2 **Background to the Appeal and Scope of Evidence**

1.2.1 Planning permission was refused by the Council's Planning Committee, following Officers' recommendation to refuse planning permission, decision letter dated 5th August 2022 for the,

"Outline planning permission with all matters reserved except access, for up to 125 dwellings, a care facility for up to 60 bedrooms (Use Class C2), and a scout hut (Use Class F2)".

1.2.2 My evidence is relevant to the following reasons identified as a part of the Council's 1st and 2nd Reasons for Refusal (RfRs);

"1. The proposal would represent inappropriate development in the Green Belt, result in a considerable loss of Green Belt openness and represent a significant encroachment into the countryside. No very special circumstances exist to clearly outweigh this harm. Consequently, the proposal conflicts with Policy GBSP1 of the Welwyn Hatfield District Plan 2005, Policy SADM34 of the Welwyn Hatfield Borough Council Draft Local Plan Proposed Submission 2016 and the National Planning Policy Framework".

2. The proposed development would severely detract from the character of the site and area, in conflict with Policies D1, D2 and RA10 of the Welwyn Hatfield District Plan 2005; Supplementary Design Guidance 2005; Policy SP9 of the Welwyn Hatfield Borough Council Draft Local Plan Proposed Submission August 2016; and the National Planning Policy Framework”.

1.2.3 My evidence covers the character, setting and appearance of the Site and considers the landscape and visual issues associated with the appeal scheme, together with a review of the effects of the proposals on the character of the landscape and the changes in visual amenity, as well as the visual aspects of openness in the Green Belt. In short the questions are,

- Would the proposed development severely detract from the character of the area (as alleged by the Council)?
- Would the proposed development cause a significant loss of Green Belt openness and a significant encroachment in the countryside (as alleged by the Council)?

1.2.4 Relevant to landscape, visual and Green Belt openness, the planning application was accompanied by,

- Landscape and Visual Impact Assessment (LVIA).
- An illustrative Landscape Masterplan.
- A Green Belt Appraisal.

1.2.5 In addition, I have prepared some further illustrative material, which I anticipate will be helpful to the Inspector at this Inquiry,

- I have taken a series of additional photographs from the local area, which further illustrate the highly limited visual sphere of influence of the Appeal Site. Bobby Browne (on behalf of the Council) has also provided input to the views, which I refer to later in this proof) (Appendix A MF5 and MF6).
- I have prepared a plan to demonstrate how the proposed development will not cause a physical or visual coalescence in the gap between Welham Green and Brookmans Park (Appendix A MF4). Whilst this is common ground between the main parties that the gap between Brookmans Park and Welham Green is not an

issue and the local plan Inspector agreed, I am now aware of the issue still being advanced by the Rule 6 party.

1.2.6 My evidence will be used by Russell Gray, who is dealing with all planning policy issues, planning matters, Green Belt, including the very special circumstances for development in the Green Belt and the planning balance.

1.2.7 It is important to emphasise that the Guidelines for Landscape and Visual Impact Assessment (GLVIA3)¹ are guidelines to best practice, and the foreword to this publication on page vii, confirms the importance of sound professional judgement and at 2.26 bullet point 5, p22 that “*Professional judgement is a very important part of LVIA*”.²

1.2.8 Paragraph 2.26, p22 also states that,

*“In carrying out an LVIA the landscape professional must always take an independent stance, and fully and transparently address both the negative and positive effects of a scheme in a way that is accessible and reliable for all parties concerned”.*³

¹ Guidelines for Landscape and Visual Impact Assessment (GLVIA3), 2013. P.vii. (CD 8.46)

² Guidelines for Landscape and Visual Impact Assessment (GLVIA3), 2013. P22. (CD 8.46)

³ Guidelines for Landscape and Visual Impact Assessment (GLVIA3), 2013. P22. (CD 8.46)

2 POLICY CONTEXT

2.1 Introduction

2.1.1 I have set out the policy context here for reference purposes in so far as it relates to the landscape and visual issues. Russell Gray is dealing with planning policy and the planning balance in the light of this evidence.

2.2 National Planning Policy Framework (NPPF)

2.2.1 A number of key policies that form part of the updated NPPF are of particular relevance in landscape and visual terms as well as Green Belt, as follows:

Achieving Sustainable Development (Paragraph 8)

2.2.2 There are three dimensions to sustainable development: economic, social and environmental:

“.....c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment;”⁴

Achieving Well-designed places (Paragraph 130)

2.2.3 A number of planning principles are stated, and these include the following:

- *“are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - *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);*
-

⁴ National Planning Policy Framework (NPPF): <https://www.gov.uk/guidance/national-planning-policy-framework> (CD 8.23)

- *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*⁵

Conserving and enhancing the natural environment (Paragraph 174)

2.2.4 Several planning principles associated with conserving and enhancing the natural environment are stated, and these include the following:

- *“a. protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*

*b. recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;.....”*⁶

2.2.5 Section 13 of the NPPF covers Protecting Green Belt land. The appeal site lies within the Metropolitan Green Belt. Paragraph 137 notes that the Government attaches great importance to Green Belts. The NPPF notes that,

⁵ National Planning Policy Framework (NPPF): <https://www.gov.uk/guidance/national-planning-policy-framework> (CD 8.23)

⁶ National Planning Policy Framework (NPPF): <https://www.gov.uk/guidance/national-planning-policy-framework> (CD 8.23)

“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.”

2.2.6 Paragraph 138 sets out the 5 Purposes of the Green Belt.

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

2.2.7 Although new buildings are considered inappropriate (para 149) in the Green Belt, Paragraph 145 states that,

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

2.2.8 Indeed, the PPG elaborates that opportunities exist to provide compensatory improvements including the following elements,

- *new or enhanced green infrastructure;*
- *woodland planting;*
- *landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
- *improvements to biodiversity, habitat connectivity and natural capital;*
- *new or enhanced walking and cycle routes; and*

- *improved access to new, enhanced or existing recreational and playing field provision*

I will set out later in this proof, how the proposed scheme has incorporated many of these elements.

2.2.9 The Appeal scheme will inevitably have an effect on the site itself. There would be a loss of openness, as a consequence of building new housing on agricultural land; however, this would be true for all development proposals for housing in the Green Belt, although the extent to which the change is experienced (or not) should take account of the effects on visual openness. Indeed the Planning Practice Guidance (PPG) sets out that,

“openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume”⁷.

2.2.10 The Appeal Site adjoins the existing settlement edge of Brookmans Park to the south and is contained by the engineered/embanked and well vegetated railway line (East Coast mainline) to the west. To the north, an area of woodland (Peplin’s Wood) wraps around the Site, extending towards further woodland known as The Legg, which forms part of the wooded backdrop providing containment on the rising ground to the northeast along with the golf course to the east. To this extent, there are very few opportunities from where the Appeal Site would be appreciated in the landscape, and the presence of existing and new planting provides a strong, robust and defensible boundary and enclosure with limited harm arising. To this end, and to assist the Inspector, I have taken a series of further photographs (see Appendix A MF5 and MF6) to illustrate the highly contained and localised context in which this Appeal Site

⁷ PPG: Paragraph: 001 Reference ID: 64-001-20190722

is nestled, being surrounded by a combination of exposed settlement edge, woodland and a rising landform beyond.

2.3 Local Plan (2005) and Proposed Submission Local Plan (2016)

2.3.1 The Reasons for Refusal references policies D1, D2 and RA10 of the Local Plan, which are.

***Policy D1 - Quality of Design:** The Council will require the standard of design in all new development to be of a high quality. The design of new development should incorporate the design principles and policies in the Plan and the guidance contained in the Supplementary Design Guidance.*

***Policy D2: Character and Context:** The Council will require all new development to respect and relate to the character and context of the area in which it is proposed. Development proposals should as a minimum maintain, and where possible, should enhance or improve the character of the existing area.*

***Policy RA10 - Landscape Regions and Character Areas:** Proposals for development in the rural areas will be expected to contribute, as appropriate, to the conservation, maintenance and enhancement of the local landscape character of the area in which they are located, as defined in the Welwyn Hatfield Landscape Character Assessment.*

(para 15.25 of the Local Plan supporting notes confirms that “ Proposals for development within the rural areas should be designed to conserve, maintain or enhance the local landscape character, as appropriate”).

2.3.2 It is considered that the scheme is of high quality design, the outline layout shows one way in which this can be delivered and there is no reason for the Council to consider that the proposed scheme would not be of high-quality design as required by saved Policy D1 and this should be addressed at Reserved Matters.

2.3.3 The character and context of the built area is predominantly two and three storey residential homes set within the existing settlement of Brookmans Park. The

development of the Appeal site will therefore inevitably bring a change to the agricultural field but in all other respects the scheme will be consistent with the character and context of the existing area and a natural extension to the settlement, within a framework of retained features in a contained location that satisfies D2 and RA10.

2.3.4 The Reasons for Refusal references policies within the Submission Local Plan 2016 which are,

“Policy SADM 34: Development within the Green Belt. Within the Green Belt as defined on the Policies Map planning permission will be granted for development in accordance with national policy and other policies in this plan subject to the following criteria”

2.3.5 The policy references the types of development that would be permitted in the Green Belt but does not include new housing developments.

“Policy SP9 Place Making and High Quality Design: Proposals will be required to deliver a high quality design that fosters a positive sense of place by responding to the following principles in an integrated and coherent way”

2.3.6 The outline scheme prepared by Ashby Design has been landscape and ecologically led, it has been carefully considered and illustrates one way a high quality scheme can be delivered for this Appeal Site. It carefully considers the opportunities and constraints associated with the Site and context, it is very well related to and well connected with the settlement of Brookmans Park, it is well contained by existing features that would all be retained, including the well vegetated (embanked) railway line, woodland (Peplin’s Wood and The Legg), as well as a golf course and enclosed by a rising landform. The scheme includes new open space, green infrastructure, as well as public access which will serve the new and existing local community. I discuss these further in Section 3.

2.3.7 There is no reason why a Reserved Matters Application dealing with the detailed design matters would not be able to take forward and also reflect, respond and deliver the same principles set out in SP9, which are:

“Respond to character and context; Legible, permeable and well connected; High quality public space and landscaping; Space for nature; Vibrant and diverse; Safe and secure; Building function and form....”.

I will discuss these points later in my proof at Section 3.

2.4 **Published Landscape Character Assessments**

2.4.1 The LVIA at section 3.2 sets out the hierarchy of Landscape Character Assessments (LCAs) (CD 8.45) in relation to the Appeal Site and wider context. These include,

- National Character Area (NCA) 111: Northern Thames Basin
- Regional Character Assessment (RCA): Wooded Hills and Ridges Landscape Character Type (Landscape East)
- District (County) Landscape Character Assessment: LCA54: Potters Bar Parkland A.

2.4.2 The National and Regional Assessments provide a useful basis for considering broad areas of cohesive character that help provide some context and overview for informing landscape character areas at a more detailed level⁸.

District Level Landscape Character

2.4.3 Hertfordshire has a County wide LCA, which deals with Landscape Character Assessment within each District Area. The County Council’s Landscape Character extract map shows the Site as being located within 54: Potters Bar Parkland A (Appendix A MF1), which is a largely enclosed area contained by the A1000 Great North Road, the railway line (plus a small portion of land east of Station Road to the

⁸ GLVIA3, para 5.14 p.79 (CD 8.46)

west of the railway line), and the northern and eastern settlement edge of Brookmans Park (including Bell Bar).

2.4.4 It is common ground that the LCA is split into two distinct parcels (Landscape SoCG 1.3) and that the issues the Council raise are associated with sub-parcel A, the area to the north of Brookmans Park (Landscape SoCG 4.2 and 4.3).

2.4.5 The assessment summarises Potters Bar Parkland as a whole (Areas A and B) as, *“Potters Bar Parkland borders the northern side of Potters Bar and encloses the distinctively shaped linear settlement of Brookmans Park that stretches between the railway in the west and the Great North Road in the east. The area includes the relic parkland of the Brookmans and Gobions Estates. Part of the Royal Veterinary College accommodates Bolton's Park farm and uses the surrounding facilities and pasture for the treatment of dairy cattle. The area includes the small settlements of Bell Bar and Swanley Bar that lie close to the Great North Road in the east.”*⁹

2.4.6 The Potters Bar Parklands A LCA is framed by settlement and infrastructure, as shown on Figure MF1 (Appendix A). The settlement of Brookmans Park lies to the south and east, the A1000 Great North Road to the north and east, whilst the East Coast Mainline to the west (apart from a small portion that lies to the west of the railway line along Station Rd) and settlements of Welham Green and Marshmoor to the north west edge. The LCA notes,

*“The sound of the trains and road traffic either side of the area increase the impact of these transport corridors on the character area”*¹⁰

2.4.7 The Potters Bar Parklands A LCA contains a number of varied land uses including the Europlants (UK) Ltd nursery, A Brand & Sons nursery, Thunder Bridge Yard travellers'

⁹ South Hertfordshire Landscape Character Assessment, LCA54 Potters Bar Parkland, pg 227 (CD 8.45).

¹⁰ South Hertfordshire Landscape Character Assessment, LCA54 Potters Bar Parkland, pg 229 (CD 8.45).

site, stables and horse paddocks on Bulls Lane. The East Coast mainline, travellers site and storage uses at Foxes Lane (off Dixons Hill Road), and the Chancellor’s School playing fields also form part of the LCA, in addition to the golf course, amongst the patchwork of woodland and fields. In addition, as the Landscape SoCG (1.8) confirms, the Appeal Site sits within a character area that is in poor condition and of moderate robustness; meanwhile the LCAs stated aims are for a strategy to ‘*improve and restore*’ (page 229¹¹).

2.4.8 Within the Potters Bar Parklands A LCA, the Council has also proposed Policy SADM30 and submitted for allocation in the Draft Local Plan Proposed Submission Version 2016 two sites for development. HS35 (GTLAA01) Foxes Lane, Dixons Hill Road is a proposed extension to an existing traveller site to be allocated for 12 pitches, whilst SDS7 (WEG4b) at Marshmoor is proposed to be allocated for mixed use development, to provide 40,500 sqm of Class B1 employment land, together with 80 dwellings.

2.4.9 Key characteristics are identified for the LCA, which include the following attributes. I have reviewed the range of attributes associated with the character area and those that relate to the Appeal Site (within the northern area of the LCA) itself;

Key Characteristic ¹²	Commentary
<i>relic estate planting and landscape features</i>	<p>The Appeal Site contains no trees.</p> <p>Beyond the Appeal Site includes Ancient Woodland in the form of Peplin’s Wood, which also adjoins the settlement, as well as The Legg which extends east. George’s Wood east of the golf course adjoins the settlement along George’s Wood Rd and Pine Grove.</p> <p>Amongst more recent tree planting, there is some evidence of the former parkland planting within parts of the golf course, to the east of the Appeal Site and where Repton¹³ is said to have been involved at some point between 1788-1812.</p> <p>Mature plantings already help to integrate the modern built settlement pattern and contain built form.</p> <p>Summary: None of the relic estate planting or landscape features beyond the Appeal Site will be lost or altered by the proposals.</p>
<i>relic estate architecture</i>	<p>The mansion house at Brookmans had an elevated position, overlooking the lakes in the parkland but was destroyed by fire in 1891 when the family were away. The family subsequently converted stable block as their home (now the clubhouse), and the house was never rebuilt.</p> <p>Summary: No relic estate architecture will be affected or altered.</p>

¹¹ South Hertfordshire Landscape Character Assessment, LCA54 Potters Bar Parkland, pg 229.

¹² South Hertfordshire Landscape Character Assessment, LCA54 Potters Bar Parkland pg 227.

¹³ Humphrey Repton in Hertfordshire; Susan Flood and Tom Williamson; page 232-233 (CD 12.15)

<i>extensive areas of recreation</i>	<p>To the east of the Appeal Site lies the golf course, which is a private outdoor sports club for members. The Appeal Site does not form part of a recreational activity, there is no public access and there are no public rights of way that cross or pass adjacent to the site.</p> <p>Summary: No footpaths or publicly accessible land used for recreation will be affected or altered by development. The proposed scheme introduces publicly accessible recreation spaces.</p>
<i>urban edge influences</i>	<p>The Appeal Site's southern boundary adjoins the modern settlement boundary and is strongly influenced by the existing urban edge.</p> <p>The railway line and golf course are both features that influence character, whilst beyond the woodland to the north, modern nursery developments along Bulls Lane add to the sense of developed countryside.</p> <p>Summary: The Appeal Site forms a natural extension to the existing pattern of development at the urban edge, contained between the railway line and golf course.</p>
<i>ridgelines and valleys</i>	<p>The Appeal Site is nestled against the settlement edge and embanked railway line, on the lower slopes between a ridgeline and a valley. Land rises to the east of the settlement to c.100m AOD at the A1000 Great North Road and to 130m AOD beyond that; whilst to the west of the railway line the land falls towards the valley at Water End.</p> <p>Summary: The land is contiguous with the existing settlement pattern which already nestles against the railway line, as was designed for in the 1930s and no ridgelines or valleys will be altered.</p>
<i>open views</i>	<p>The Appeal Site is well contained by built features, woodland and settlement on an inward facing landform that helps further contain the Site from open views. As such, it is not possible to appreciate the wider landscape from within the site.</p> <p>By contrast, more elevated ground (for example, the site of the former manor house within the golf course) affords attractive open panoramic views across the landscape, including to other character areas.</p> <p>Summary: No open landscape views across the LCA will be altered.</p>
<i>mixed farming</i>	<p>The Appeal Site is a parcel of grassy agricultural land, contained from contrasting surrounding land uses, the adjoining settlement, the railway line, woodland and an established golf course.</p> <p>Summary: The loss of some contained agricultural grassland is a characteristic affected.</p>

2.4.10

The LCA also highlights physical influences and historic/cultural influences associated with the Potters Bar Parkland A. Those relevant to the Site are;

“PHYSICAL INFLUENCES¹⁴

***Land cover and land use:** Parkland is the dominant land cover around the north of Potters Bar and has provided the framework for a variety of recreational pursuits. Intermittent mixed woodlands provide a mature setting for settlement and recreation. Two extensive golf courses make use of the historic landscape structure. Other land uses include the public open space of Gobions Park, low intensity farming around*

¹⁴ South Hertfordshire Landscape Character Assessment; LCA54 Potters Bar Parkland; page 228 (CD 8.45)

White Lodge Farm and dairy farming comprising fenced pasture around the dairy farm at the Royal Veterinary College.

Vegetation and wildlife: Elm is a common hedgerow species, with ash, hawthorn, bramble, blackthorn and dog rose locally significant. Field oak trees are also common in the area and the parkland trees at Brookmans Park continue to be an important landscape feature. Oak, Corsican pine and field maple trees are apparent in the discrete woodlands. Gobions Wood is species-rich along the stream course and contains relic 17th-century gardens. Mature vegetation borders the watercourses and osier beds can be found around the water at Gobions open space. Neutral to acid grassland is also a local feature, with saw-wort a characteristic plant.

HISTORIC AND CULTURAL INFLUENCE¹⁵

Field pattern: Irregular field shapes are predominantly enclosed by fences, particularly on the land used for dairy cattle around the veterinary college and paddocks along Bulls Lane. Field sizes are generally small to medium in size. A cluster of small fields to the north of Bulls Lane is associated with the smallholdings and nurseries. Hedgerows without trees and tree lines also define field pattern.

Settlements and built form: Historically the country houses were built on the elevated ground with a southern aspect. The modern settlement of Brookmans Park spreads down the slope and stops at the railway line. The small settlements of Swanley Bar and Bell Bar originated from the tollhouses along the Great North Road and have retained their pre-20th century character. Many of the houses in these settlements date back to the Tudor and Georgian periods and are of locally traditional construction, such as half-timber and red brick.”

2.4.11 The **Visual and Sensory Perception¹⁶** for this landscape is noted as;

“Topography and vegetation limit visibility in the shallow valleys, while long-distance views are good from the higher land. Discrete woodland belts along the dips divide the

¹⁵ South Hertfordshire Landscape Character Assessment; LCA54 Potters Bar Parkland; page 228 (CD 8.45)

¹⁶ South Hertfordshire Landscape Character Assessment; LCA54 Potters Bar Parkland; page 229 (CD 8.45)

landscape, separating Brookmans Park Village from the settlements to the north and south. The sound of the trains and road traffic either side of the area increase the impact of these transport corridors on the character area”.

Rarity and distinctiveness: *“This area is rather typical of the impact of development on the former parkland areas of the county. Distinctive elements of the former parklands are discrete elements within the predominantly 20th-century landscape.”*

3 LANDSCAPE AND VISUAL ISSUES

3.1 The Site, context and its contribution to Landscape Character

3.1.1 Brookmans Park is a modern day commuter village established in around 1935, when the Brookmans Park Estate (comprising a former parkland owned by the Gausson family until 1923) was sold off to developers, who wanted to create a modern settlement within easy reach of the City, and the local towns of Hatfield and Welwyn Garden City accessible by train.

3.1.2 An entirely new railway station was constructed in Brookmans Park in 1926 for the purpose of creating a new settlement. As such, Brookmans Park as a modern new settlement has existed for less than 100 years, with the majority of development taking place in the period between 1930 and 1960. The 1926 Estate Masterplan and 1930 Estate Brochure for the new village (Appendix A MF3) indicated an intention to develop further by connecting Brookmans Park to Bell Bar and the Great North Road via an extension to Bradmore Way.

3.1.3 The period 1923-1939 saw the greatest period of change,

“...A complete transformation took place. No one who left Brookmans Park in 1918 would have recognised it on his return twenty years later. A few old landmarks had remained, Moffats and Moffats farmhouse, Folly Arch, some dwellings in Bell Bar, the lodges at the junction of the Drive and the Great North Road and at the entrance to Gobions. But nearly all the rest, parkland, meadows and fields had been submerged in a tide of bricks and mortar”¹⁷.

3.1.4 Peplin’s Wood (ancient woodland) to the north of the Appeal Site is one of a number of established landscape features in the surrounding area that form a mature wooded framework for the modern land uses that have taken place since the 1920’s. This includes the settlement edge immediately to the south of the Appeal Site, the

¹⁷ [North Mymms History Project: A Modern History of Brookmans Park 1700-1950; Peter Kingsford \(CD12.01\)](#)

embanked mainline railway line to the west and to the east, Brookmans Park Golf Club. As noted in the LCA,

“Intermittent mixed woodlands provide a mature setting for settlement and recreation. Two extensive golf courses make use of the historic landscape structure”¹⁸.

“Field oak trees are also common in the area and the parkland trees at Brookmans Park continue to be an important landscape feature”¹⁹.

3.1.5 Residential development forming the edge of the inset settlement against the railway line (an audible presence) runs along the southern boundary of the Site, extending along Peplin’s Way and Bradmore Way back to the railway station, with a mixture of modern house types and styles, but mainly comprising modern 2 to 3 storey large detached residential properties, in plots that generally have well vegetated gardens including mature trees, that contribute to a leafy but suburban (domestic) character to the local area overall. As noted in the LCA,

“Brookmans Park has a localised, but significant impact on the historic parkland to the north and south of it”²⁰.

3.1.6 The Appeal Site itself comprises an open irregular shaped agricultural field, with a gentle gradient across the Site that falls from northeast to the west, from approximately AOD 105 to AOD 90. The more elevated land to the east (contributing to the containment and the wooded backdrop) has seen the location of a number of different features over the years, including the BBCs Brookmans Park Transmitter Station built in 1928-29 and lying adjacent to the east side A1000 Great North Road; meanwhile, Brookmans House (the Gausen’s residence) which overlooked the former parkland estate to the southwest, has long since been demolished (after a

¹⁸ South Hertfordshire Landscape Character Assessment; LCA54 Potters Bar Parkland; page 229 (CD 8.45)

¹⁹ South Hertfordshire Landscape Character Assessment; LCA54 Potters Bar Parkland; page 228 (CD 8.45)

²⁰ South Hertfordshire Landscape Character Assessment; LCA54 Potters Bar Parkland; page 229 (CD 8.45)

major fire in 1891), within part of the golf course and clubhouse facilities (Appendix A MF6 Sheet 11, photo N). The LCA noted,

“Historically the country houses were built on the elevated ground with a southern aspect. The modern settlement of Brookmans Park spreads down the slope and stops at the railway line”²¹.

3.1.7 The well contained Appeal Site adjoins the settlement edge beside the embanked railway line at the and has limited visibility due to Peplin’s Wood and other mature woodland extending up the containing landform to the northeast. The eastern boundary consists of large mature trees and scrub, whilst the settlement boundary along Peplin’s Way and Bradmore Way includes gardens, hedges and fences plus some trees; however, the settlement edge is apparent (see Appendix A MF6, sheet 9, photos L and M).

3.1.8 As such, whilst the Appeal Site itself sits within a context containing some attributes of the character area, it is a highly contained parcel of agricultural land that forms part of a transition zone which nestles close to the embanked and vegetated railway line and is influenced and characterised by suburban housing at the settlement edge, as well as the local well wooded slopes that provide a significant degree of containment beyond the Appeal Site. The LCA confirms this limited visibility,

“Topography and vegetation limit visibility in the shallow valleys, while long-distance views are good from the higher land. Discrete woodland belts along the dips divide the landscape, separating Brookmans Park Village from the settlements to the north and south”²².

3.1.9 Overall, I consider the Appeal Site contains some attributes that are representative of the local landscape character but no attributes of rarity; however, the influence afforded by adjacent built development (settlement and railway line), contrasts with wider local landscape characteristics and provides suburban character influences

²¹ South Hertfordshire Landscape Character Assessment; LCA54 Potters Bar Parkland; page 228 (CD 8.45)

²² South Hertfordshire Landscape Character Assessment; LCA54 Potters Bar Parkland; page 229 (CD 8.45)

associated with the modern settled landscape. As such, the framework of mature wooded blocks surround the developed settlement fringes, provide an attractive backdrop to both the Appeal Site and settlement as a whole and are typical features contributing to the landscape setting of Brookmans Park and its former parkland context. The LCA recognises that,

“This area is rather typical of the impact of development on the former parkland areas of the county. Distinctive elements of the former parklands are discrete elements within the predominantly 20th-century landscape”²³.

3.2 Landscape Value, Susceptibility and Sensitivity to change

3.2.1 The Council carried out a detailed Sensitivity Study²⁴ for the area, covering land to the north of Brookmans Park. Sensitivity studies take into consideration the attributes/features of value within the character area and the overall susceptibility to change²⁵.

3.2.2 In relation to the Appeal Site (land north of Brookmans Park) it was concluded that (refer to Area 54b, page 212²⁶) sensitivity to residential development is typically moderate, but reducing to low-moderate further east (towards Bell Bar),

“To the east of the railway line the sloping landform makes the area visually prominent, providing a rural visual setting to the settlement, although the modern character and form of Brookmans Park limits sensitivity in this respect. To the north of the settlement the remnant parkland characteristics of the golf course, and the ecological value of deciduous woodland blocks, create sensitivity. However woodland containment and settlement influence can also be considered to reduce sensitivity in terms of their impact on rural character both within and beyond the area, and

²³ South Hertfordshire Landscape Character Assessment; LCA54 Potters Bar Parkland; page 228 (CD 8.45)

²⁴ Development of Evidence for Welwyn Hatfield Local Plan: Landscape Sensitivity Assessment, LUC July 2019 (CD 6.27)

²⁵ TGN 02-21 Assessing Landscape Value Outside National Designations, paras 2.2.3; p.4 and 2.2.13; p.5 (CD 8.44)

²⁶ Development of Evidence for Welwyn Hatfield Local Plan: Landscape Sensitivity Assessment, LUC July 2019; page 212 (CD 6.27)

tranquility is further reduced by road and rail links. Therefore sensitivity to residential development to the east of the railway line north of Brookmans Park is typically moderate”.

By contrast, for land to the south of Brookmans Park sensitivity increases to moderate-high (as recorded and mapped on page 216²⁷).

3.2.3 It is common ground that the Appeal Site is not a Valued Landscape for the purposes of the Framework 170a; it is recognised that all landscapes, even undesignated landscapes have a value or value attributes. GLVIA3 (para 5.27, page 83) records that,

“As a starting point reference to LCAs and associated planning policies and/or landscape strategies and guidelines may give an indication of which landscape types or areas, or individual elements or aesthetic or perceptual aspects of the landscape are particularly valued. A stated strategy of landscape conservation is usually a good indicator of this”.

As set out above in section 2.4 of this proof above, the stated strategy for this LCA (LCA54: Potters Bar Parkland) is to ‘improve and restore’²⁸.

3.2.4 As the Character Assessment, LVIA, this Proof and the Council’s Sensitivity Assessment highlights, value is considered through a series of value characteristics (including condition, quality and character, representativeness etc. using box 5.1, page 84 of GLVIA3²⁹ and TGN02/21³⁰).

3.2.5 I have set out the following commentary on value and how it relates to the Appeal Site compared to the wider parcel in the sensitivity study.

Attribute	Commentary on Appeal Site and Value
Landform	Low-Moderate: Inward facing (containing), smooth, gently undulating landform at the

²⁷ Development of Evidence for Welwyn Hatfield Local Plan: Landscape Sensitivity Assessment, LUC July 2019; page 216 (CD 6.27)

²⁸ South Hertfordshire Landscape Character Assessment, LCA54 Potters Bar Parkland, pg 229 (CD 8.45)

²⁹ GLVIA3, Box 5.1, page 84 (CD 8.46)

³⁰ TGN 02/21 Assessing landscape value outside national designation, para 2.2.3 page 4 (CD 8.44)

	settlement edge.
Landscape pattern /time depth	Moderate: Existing field pattern bordered by ancient woodland, with former parkland tree planting in golf course to the east. Enclosed field bordered by settlement, railway line and golf course.
'Natural' character	Moderate: Appeal Site itself contains no trees or hedgerows that would be vulnerable to loss; however, natural characteristics lie beyond in the wider area (trees, hedges, woodland).
Built character	Low: Brookmans Park has a modern character that influences the Appeal Site, with no built heritage of note nearby.
Recreational value	Low: There are no public rights of way passing through or adjacent to the Appeal Site from which it would be experienced. Golf course to the east.
Perceptual aspects	Moderate: Proximity to modern settlement edge influences character, whilst the incessant noise from trains is disruptive. Appeal site is positioned between woodland and adjoins the settlement edge, affecting its remoteness. Presence of wooded backdrop and well treed context helps provide balance to the developed landscape and contains views to within the field itself (thus limiting wider views apparent on higher ground).
Settlement setting	Moderate: Woodland and former parkland tree planting within the golf course help inform the setting; however, the character of the settlement is modern and is visibly apparent from the Appeal Site.
Visual prominence	Low: Enclosure of the Appeal Site is reinforced by woodland and landform, which is inward facing towards the settlement. The west facing slopes on parts of the golf course to the east provide more elevated and prominent views across the landscape. There are no promoted views, routes, or recreational areas.

3.2.6 I consider that the overall value attributed to the Appeal Site in this context is Medium, and this is reflective of my assessment and considered alongside the factors associated with the relevant LCAs and baseline documents, as set out in the LVIA and this proof of evidence. I also recognise there are attributes of the wider landscape beyond the site boundaries that contribute to the value (trees and woodland, relic structures), since the wider area contains a number of former parkland features and structures of historic value (I have referred to some of these above in section 2.4.4) within the developed landscape.

3.2.7 Part of the approach for LVIA is the consideration of susceptibility, which in GLVIA3 (para 5.40, page 88) is stated as being,

“...the ability of the landscape receptor to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies”³¹.

³¹ GLVIA3, para 5.40, p.88 (CD 8.46)

- 3.2.8 I consider that the Susceptibility of the Appeal Site for the purposes of this scheme is Medium (as set out in the LLA LVIA section 5.2) and the agricultural field parcel has the ability to accommodate the proposed scheme.
- 3.2.9 Overall the landscape, which is already influenced by existing development and displays some suburban or urban fringe characteristics at the settlement edge, is considered to be compatible with the adjacent uses and can absorb development of this type without the loss of key characteristics, individual elements or features that inform the overall landscape character. The proposed development will nestle adjacent to the railway line and be entirely contiguous with the existing settlement pattern and character, being set in the same retained framework of mature vegetation features as the existing settlement already is.
- 3.2.10 The Sensitivity Assessment (page 213³²) seeks to ensure that development should minimise adverse impacts on landscape and visual character of this location by identifying the ‘key sensitivities and mitigation potential on the edge of Brookmans Park’. The proposed development does not affect these sensitivities as follows,

Issue	Commentary
<i>“Ensure development is not placed on slopes that are visually prominent in the wider landscape</i>	Development will not be placed on slopes that are visually prominent in the wider landscape. The Appeal Site is well contained by settlement edge, woodland and landform and development will be contiguous with the existing settlement pattern, nestled adjacent to the railway line. More visually prominent slopes lie to the east of the Appeal Site within the golf course (site of the former manor house).
<i>Avoid damaging parkland character and protect BAP Priority Habitat deciduous woodlands as well as hedgerows and other semi-natural features</i>	The Appeal Site contains no trees. Former planting associated with the parkland to the east of the Appeal Site will be retained within the golf course. Development will be offset from existing (designated) woodland and landscape buffers provided with new planting, including semi natural features. As a result, the settlement and development will remain set within a mature wooded framework.
<i>Maintain and enhance connectivity between natural landscape elements, avoiding containment of sizeable areas, such as Brookmans Park Golf Course, by development</i>	The scheme will not result in the golf course being contained and incorporates new semi natural connecting features between the woodland and the golf course.
<i>Ensure that the role of high ground south of Hawkshead Road as a visual separator between Brookmans Park and Potters Bar / Little Heath is maintained”</i>	This is to the south of Brookmans Park and does not apply to the Appeal Site.

³² Development of Evidence for Welwyn Hatfield Local Plan: Landscape Sensitivity Assessment, LUC July 2019; page 213 (CD 6.27)

3.3 Proposed Landscape Strategy, Mitigation and Enhancement

3.3.1 LLA has produced a Landscape Masterplan (Appendix B) to help demonstrate more clearly the approach to show how the Appeal Site comprises a number of elements that demonstrate how key features are being retained, integrate the proposals as well as respond where possible to the character of the LCAs and help direct the Landscape Management Strategy³³ forward in a positive way.

3.3.2 I am pleased to note that Mr Browne agrees the proposed landscape scheme contains a number of beneficial features (landscape SoCG 4.4).

3.3.3 For clarity, proposed scheme shown on the illustrative landscape masterplan incorporates the following,

- Retention, management and enhancement of the existing mixed native vegetation and mature trees beyond the Site boundaries, together with new trees to create more diversity and structure and connectivity of green infrastructure.
- The existing gap in the north east corner of the Site will be planted with mixed native hedge and trees to provide a wildlife buffer connecting corridor between Peplin's Wood and the golf course, forming a strong robust boundary.
- Creation of a strategic buffer that would be fenced to prevent access and to provide an offset of at least 15m (in line with Natural England requirements). In reality, the carefully designed proposals ensure a much more significant buffer has been provided ranging from a minimum of 15m and up to 70m to the development edge, comprising new landscape features, including species rich grassland, woodland and native scrub planting.

³³ South Hertfordshire Landscape Character Assessment, pg 230 (CD 8.45)

- Set back development from the eastern boundary and strengthen the landscape buffer alongside the existing edge with new hedge, scrub and tree vegetation adjacent to Brookmans Park Golf Club.
- Ensure an appropriate offset from the settlement edge north of Peplins Way and Bradmore Way, to allow for new tree planting and features (such as orchard trees and species rich grassland) within areas of open space. This will ensure a soft interface with the rear gardens extending along Peplins Way and help reinforce character, as well as connecting the southern spur of Peplin's Wood with the golf course for wildlife and biodiversity reasons.
- Provision of wildlife friendly SUDs features, within open space including species rich planting and longer grass, including meadow and/or heathy grass to enhance the biodiversity and landscape characteristics of the area.
- Provision of native trees, as well as orchard trees, by including 'heritage apple' trees within species rich grassland throughout the layout.
- Provision of attractive areas of public open space (including 2no. play spaces) that promote creative play and increase connectivity and circulation, for the health and wellbeing of the local community. The provision of play elements on the new local greens will include natural and rural character features for play areas aimed at a range of age groups.

3.3.4

The design of the proposed scheme ensures permeability, legibility and connectivity. The design will continue the streetscene and existing character of Bradmore Way (which includes pedestrian paths set behind the verge) by extending it further into the site. As a result, the existing vista along Bradmore Way remains well connected and legibility is maintained, so that people can still appreciate the view of the woodland along the road. In addition, most of the internal roads within the layout allow for outward vistas and views towards the existing wooded backdrop on higher ground. The scheme also provides public access, which includes circular walks that will allow people more to appreciate more of the woodland and its edge from close up, rather than from a single distant point towards the end of Bradmore Way.

3.3.5 Although there will be a loss of grassland and given there are currently no trees or hedges present on the Appeal Site, the scheme includes the following new elements that have been developed with the scheme ecologist, to increase the landscape resource of the Appeal Site and to provide added wildlife and biodiversity benefits,

- c.360 metres of new native mixed species hedgerow.
- c.1.18 hectares of new native mixed species broadleaved woodland.
- c.2.55 hectares of species rich modified grassland (wildflower meadow).
- c.0.25 hectares of wetland planting, including aquatics, wetland meadow grass for the SUDs basin.
- In excess of 185 new trees, comprising a mixture of street trees, focal trees, as well as orchard trees (such as heritage apple).

3.3.6 As such, I consider the proposals help to deliver a number of the Council's guidelines for managing change as follows:

LCA Management Strategy and Guidelines for managing change	How does the proposed scheme contribute to the Landscape Management Strategy, Change or enhancement of features relevant to Character, as part of the LCA? (to be read in conjunction with the outline Landscape Masterplan strategy)
LCA Potters Bar Parkland	
<i>Improve public access arrangements to woodlands, with attention to car park design and safety.</i>	Given the nature of Ancient Woodland and its protection, public access to Peplin's Wood (which is beyond the Appeal Site but under the applicants control) was considered during the design process but was discounted due to potential for damage arising from increased activity, through the ecologist's discussion with Herts Ecology and so is currently proposed to be fenced. Although, the applicant is open to revisiting this if desired. However, the scheme does allow for new public access to the landscape areas and features around the Appeal Site.
<i>Use ancient hedge and field boundaries to select the most appropriate location for woodland expansion.</i>	The proposed scheme incorporates new areas of woodland expansion in line with the ecologist and stakeholder discussions.
<i>Encourage the reversal of habitat fragmentation and the creation and improvement of habitat links to create ecocorridors.</i>	The proposals retain and enhance the existing boundaries of the Appeal Site, where appropriate. Connectivity is important and led by the scheme ecologist, the layout makes use of existing boundary features to link the planting between Peplin's Wood to the golf course in two locations (one is the reinstatement of a former hedgerow boundary), to provide greater connectivity for wildlife and biodiversity across the across the north east edge and southern boundary, to help reverse fragmentation. The proposals also allow for enhancement of features through an agreed scheme of habitat management through the scheme ecologist.
<i>Replant hedges along former hedge lines, especially where they can replace fencing, as a means of building up eco-corridors.</i>	The proposals include the replanting/reinstatement of the former hedge line along the northeast boundary. The proposals include to make wildlife connections between Peplins Wood and the golf course, as mentioned above, using mixed native planting including trees. In addition to the

	<p>extensive new planting scheme, further ecological measure will include,</p> <ul style="list-style-type: none"> • Creation of wildlife friendly interventions – including log piles, hedgehog box, insect homes etc, • Provision of bat boxes. • Provision of bird boxes on suitable trees.
<p><i>When replanting woodlands use indigenous stock of local provenance wherever possible.</i></p>	<p>The proposals seek to enhance the landscape and ecological value of the scheme, not only for woodlands. The scheme has been developed with ecological approach and include,</p> <ul style="list-style-type: none"> • New mixed native trees and understorey planting will be planted, using species appropriate to the area and to increase ecological value and reinforce the characteristics of the area, including with nectar and berry sources. • Provision of pond that will have shelves and comprise appropriate native aquatic and marginal species and be wildlife friendly. • Enhancement of planting, in particular the boundaries of the Appeal Site will be reinforced and strengthened with mixed species native hedgerow planting and incorporating hedgerow trees. • Areas of longer flowering grass lawns, incorporating wildflowers (as an alternative to standard amenity grass). • Areas of species-rich tussocky meadow grassland. • Orchard trees will comprise older varieties local to the area, and could be achieved alongside a local project group, such as the Herts Apples and Orchards Project³⁴.
<p><i>Ensure new planting is encouraged to maintain age diversity. Ensure landscape improvements respect the historic context of existing features and the form and character of parklands and gardens. Ornamental species should only be used to replace damaged or over-mature specimens, where appropriate.</i></p>	<p>Whilst there are localized changes the overall character and appearance of the existing road frontage along Bradmore Way will be remain as existing. The existing road frontage will be strengthened with the introduction of new planting, as well as the management of the existing vegetation.</p>
<p><i>Encourage the establishment of buffer strips of seminatural vegetation along all watercourses, to prevent pesticide, herbicide and fertiliser run-off and provide habitat for wildlife, avoiding potential conflict with recreational use and linking into ecological corridors within the wider landscape where possible.</i></p>	<p>There are buffer strips being provided to improve the connection between ecological corridors between Peplin’s Wood to the golf course, including across both the northeast and southern boundaries of the Site. The buffer strips will comprise semi natural mixed native species, including hedge planting, trees, orchard trees and species rich grassland.</p>
<p><i>Encourage landowners and developers to retain and increase ponds and wetland areas to enhance their visual and wildlife functions.</i></p>	<p>The proposals will increase the number of ponds and bio retention features, including swales and ditches; these SUDs features will be planted with appropriate diverse plant species that add biodiversity value and support the quality of ponds in the area in line with guidance and part of the suite of ecological measures, as set out in the ecology submissions. These features will be refined in more detail at the Reserved Matters stage and where appropriate features are envisaged to be shelved and comprise native aquatic and emergent planting and be sited within an area of species-rich tussocky meadow grassland.</p>

³⁴ Hertfordshire Information | Apples & Orchards Project (applesandorchards.org.uk)

<i>Improve the management of old meadows and pastures by ceasing fertiliser and herbicide application and introducing sensitive grassland management such as late hay cutting or low-density livestock grazing.</i>	Management of new meadow grass areas could allow for late hay cutting techniques, as part of a future ecological Management Plan agreed with the ecologist.
<i>Ensure that the surroundings of converted and new buildings are designed and maintained to be in keeping with their agricultural surroundings by ensuring that 'garden' details are screened from view where possible and native species are used for hedging and tree planting around the perimeter. Exotic/ornamental species should only be used in close proximity to the dwelling.</i>	The scheme layout includes street trees, hedges and other planting that is appropriate for the character of the area. Native species will be incorporated as a key component to ensure the new scheme is well integrated into the local context, meanwhile all details will be agreed as part of the Reserved Matters Application (should the outline scheme be consented), including garden details.
<i>Encourage effective management of planting along transport corridors to ensure thinning, selective felling and replanting is undertaken to achieve a varied age structure and a species mix that reflects local landscape character.</i>	The proposed scheme provides a significant gain in the number of new trees and planting across the Appeal Site, which will contribute to local landscape character and ensure a varied age structure. No trees are proposed to be removed.
<i>Provide public interpretation of the complex landscape history and evolution of the area and more informal public access."</i>	It is perfectly possible to provide more public interpretation of the area at the Reserved Matters Stage, this could involve signs or boards/ maps showing the evolution of the village, the woodland for example.

3.3.7 The illustrative landscape masterplan demonstrates how a carefully considered approach will deliver positive new elements into the landscape. Although, it is not clear why Mr Browne considers the scheme delivers beneficial features (Landscape SoCG 4.4), but does not believe that the scheme will support the above Management Strategy (Landscape SoCG 7.7).

3.3.8 As such and taking all the above into consideration, overall it is considered that the design of the scheme also successfully delivers on the points required in policy SP9 Placemaking and High Quality Design which are achieved (and could be developed further as part of the Reserved Matters),

“Respond to character and context; Legible, permeable and well connected; High quality public space and landscaping; Space for nature; Vibrant and diverse; Safe and secure; Building function and form....”.

3.4 Summary of Landscape Issues and Effects

3.4.1 There will inevitably be a degree of localised harm on the landscape of the Appeal Site itself in this location as there will be a loss of agricultural grassland and the open

character of the site itself will change, but it is not harmful to the character of the area as alleged by the Council in their Reasons for Refusal because;

- The Appeal Site is on lower lying part of the inward facing landform beside the railway line, contiguous with the modern (visible) settlement pattern to the south.
- The existing presence of a well-established settlement edge and railway line form very apparent and permanent features that impart suburban characteristics across the Appeal Site. The golf course represents a modern land use within a wooded framework to the east.
- There would be no loss of existing distinctive features of value such as trees, woodland or hedgerows. Furthermore, existing mature belts of woodland in the wider landscape beyond the Appeal Site will continue to form the strong framework and backdrop for the proposed development, in exactly the same way that they do now for the existing settlement.
- Extended, restored or new landscape features forming new structural landscape elements achieves a much greater landscape resource within the Appeal Site than currently exists.
- The development comprises new tree planting (including street trees), together with native hedgerow planting (either as infill, supplementary or new sections), native shrub planting, tussocky (species rich) meadow grass, amenity grass and amenity space with shrub and ground cover beds for residents that delivers some key characteristic features associated with the LCA.
- The effects of the development on the landscape will be limited and localised, as the Appeal Site will remain contained by the existing settlement edge, an existing woodland framework and the rising landform beyond, meaning the effects will not be appreciated in or cause harm to the wider area.

3.4.2

The LVIA concluded that the significance of the landscape effects with regard to the proposed scheme would represent a Slight Adverse Effect on a localised part of the LCA adjoining the settlement edge, and a Slight Adverse to Negligible Effect following establishment. The key attributes of the receiving landscape will be retained, and the proposed scheme will not alter the qualities or characteristics of the local or wider

landscape, which will remain the key containing features with or without the development.

3.4.3 The Council's own Landscape Officer (Oliver Waring) provided a consultation to the Case Officer on 1st July 2022 (CD 3.32), which confirms there is no loss of trees and that a suitable buffer from the protected woodland in landscape terms is provided.

3.4.4 Setting aside GB openness considerations, Mr Waring's conclusion is clear that there are no grounds for a landscape objection, and furthermore he did not disagree with any aspects of the LVIA, which similarly concluded the change in landscape terms was primarily to the site itself, rather than the LCA in a wider sense as I have set out above. He stated,

"I have taken a look at the above application with regard its impact on the landscape. There will be obvious impacts on the character of the land within the Green Belt due to the change of use of the site".

".....The proposal has no significant impact on the existing vegetation. If the proposal meets the criteria for development within the Green Belt there is no objection, in principle, on landscape grounds".

3.4.5 Finally, Mr Waring acknowledges the proposals take into account existing vegetation beyond the Appeal Site boundaries and that the landscape buffer between the housing and woodland is sufficient to minimise any impacts. Furthermore, he suggests a detailed landscape scheme should be prepared should the scheme is approved. This can be provided as part of a Reserved Matters Application (or conditioned).

3.4.6 It is a concern and very unclear as to why the Case Officer has drawn totally different and contradictory conclusions to the Council's own professional landscape officer's advice, when presenting the Committee Report, which states at para 11.43,

"The submitted Landscape and Visual Impact Assessment (by Liz Lake Associates, April 2022) considers that the proposals for the site would have a 'slight adverse

impact' on the LCA and, with mitigation measures, it would have a longer term 'slight adverse to negligible effect'. Officers do not agree with this conclusion. The proposed development would transform what is an open agricultural/grazing field to a built-up suburban development forming an extension to the settlement of Brookmans Park. The built form would diminish open views and appreciation of other key features of the site which are characteristic of the Potters Bar LCA. This would not be acceptability mitigated by the mitigation measures outlined".

3.4.7

It is very disappointing that the Case Officer has come to their own unsubstantiated conclusions and has not considered the Landscape Officers advice fully. In addition, the Case Officer has not,

- Recognised or appreciated the significant nature and quantity of appropriate new planting that will be provided to contribute to the character of the LCA, as I described earlier.
- Recognised or appreciated that the proposed layout is such that most of the internal roads allow for outward vistas and key views out towards the existing wooded backdrop (Peplin's Wood and The Legg).
- Recognised or appreciated that when viewed from Bradmore Way, the scheme continues the legible street pattern and maintains a view of the woodland.
- The proposed layout allows for public access and new greens, which will allow people more to appreciate more of the woodland and its edge, rather than from a short section of road towards the end of Bradmore Way.

3.4.8

Whilst it is common ground between the main parties that the proposed scheme will not harm the gap or result in coalescence between Brookmans Park and Welham Green, I am aware that the Rule 6 party does refer to this matter in their SoC. As such, I have prepared a map (Appendix A MF4) to illustrate how the existing gap will be fully maintained.

3.4.9

I have also set out the position of the Council which stated,

“The Green Gap Assessment 2019 reviewed land between settlements, the role that gaps play in maintaining settlement pattern and character and the impact that development may have on that role. The assessment considered how the draft site allocations and promoted sites in the gaps would affect settlement separation and recommends the identification of a number of policy gap areas and mitigation measures to offset any erosion of these gaps. The proposed allocations would not result in the coalescence of Brookmans Park and Welham Green. A gap of 402m would remain if both WeG6 and BrP12a were to be allocated (this would be wider than the gap between most of the settlements in the northern part of the borough) and the settlements would remain separated by the railway embankment, woodland and intervening open land”³⁵.

3.4.10 In addition, the Local Plan Inspector Middleton concluded,

“There is currently a gap of about 0.5km between built development at the two villages. The proposal may reduce it by 50m if the whole of the area up to Peplins Wood were to be developed but the development could clearly be offset to avoid this. Indeed, as Peplins Wood is a Local Wildlife site, there will be a requirement for an undeveloped buffer, with a minimum width of 15m, in any event. The development could be screened from the rest of the parcel to the north-west by earth mounding and planting, removing any impact that it would otherwise have on the wider GB to the north-east”.³⁶

3.4.11 In summary, the proposed scheme does not reduce the gap at all and there would be no coalescence of the two settlements. Neither settlement can be seen from the other, and they are separated by the elevated railway line, which is itself screened from the Appeal Site by mature woodland. As shown on the illustrative landscape masterplan (Appendix B) and Plan MF4 (Appendix A), the design of the proposed scheme allows for much greater offsets from the Ancient Woodland to the

³⁵ Minutes of the Cabinet Parking and Planning Panel (CPPP) 23rd January 2020, response to Q3. Page 4.

³⁶ EX273 Stage 9 Round up notes, Inspector Middleton para. 118, regarding BrP12a

developable area (Natural England Standing Advice is 15m), which also takes into account the constraint posed by National Grid infrastructure in the north west of the scheme.

3.5 Summary of Visual Effects

- 3.5.1 In summary, GLVIA3 identifies in para. 6.33 that visual receptors most susceptible to change are residents at home and users of the PRoW network resulting in a higher susceptibility/sensitivity of the receptors. GLVIA3 also states *“Travellers on road, rail or other transport routes tend to fall into an intermediate category of moderate susceptibility to change”*.
- 3.5.2 GLVIA3 identifies (in para 6.34) that visual receptors less susceptible to change include people engaged in outdoor sport or recreation which does not involve or depend upon appreciation of views of the landscape. This would be true of the golf course, which lies to the east of the Appeal Site.
- 3.5.3 The Council's Reasons for Refusal do not allege visual impact; however, for completeness I review the findings of the LVIA here.
- 3.5.4 Section 3.5.3 of the LVIA confirmed that desktop work and site appraisal established an initial envelope of search of approximately 2km, which was refined and narrowed down based on the following factors, which established the limited sphere of visual influence of the Appeal Site, as follows:
- *“Views from the north are well contained by the immediately adjacent Peplin's Wood. Potential longer views from land to the north and west are well screened by further vegetation associated within the well wooded context, which reinforce the prevailing landscape pattern within the wider landscape beyond the settlement.*
 - *Views from the west are contained by a combination of part of Peplin's Wood, which runs parallel alongside the elevated railway embankment of the East Coast mainline, which separates the Site from the wider landscape to the west. Views into or across the Site from the railway lines are screened by the well-established Peplin's Wood.*

- *The combination of hedgerow boundaries with mature trees and the eastward [sic] facing landform associated with the man-made golf course, generally limits views to the east to localised views from within Brookmans Park Golf Club.*
- *The presence of the settlement to the south, limits visibility to a series of relatively short distance views in the local area. To the south of the Site, existing houses forming the settlement edge are set in mature trees, serve to heavily filter and fragment views from the south, limiting most views to glimpses and small gaps in built development edge along Peplins Way and Bradmore Way”.*

3.5.5 I have taken the opportunity to revisit the Site and surroundings to consider the locations where there may be effects of a visual nature experienced from public locations. The follow up visits have been undertaken in winter when trees have no leaves and I have found no reason to change my appraisal of the above. Indeed it has been agreed through the landscape SoCG (5.3) that the visual effects are localised.

3.5.6 In reviewing this information, I have considered the effects on the visual environment below to be limited predominantly to nearby residential properties at the settlement edge, as well as a view along Bradmore Way within the settlement, together with users of the golf course, as was originally set out in the LVIA. In general, properties have rear gardens with boundary vegetation, and furthermore areas of green space and planting are proposed along the southern portion of the Appeal Site, ensuring that the effects are relatively limited. Road users and people playing outdoor sport (golf) are less susceptible to changes in visual amenity. Overall, there are very few locations from where the proposed scheme will be visible, especially in the wider context. I have also taken some additional photographs to supplement the information provided (Appendix A MF5 and MF6).

3.5.7 In respect of visual amenity, the Council’s Landscape Officer, Oliver Waring appears to concur with the visual assessment in the LVIA making no comment on views, viewpoint selection or any visual effects that were identified. I welcome his conclusion that there was no objection in his professional opinion.

3.5.8 Again, it is unclear why the Case Officer's Committee Report contradicts the conclusions drawn by the Landscape Officer by alleging visual harm,

".....The built form would diminish open views and appreciation of other key features of the site which are characteristic of the Potters Bar LCA. This would not be acceptability mitigated by the mitigation measures outlined"

3.5.9 Following the Case Management Conference (CMC) on 5th December 2022, the appellant was advised that the Council's landscape witness Mr Bobby Browne had some additional views for our consideration. I emailed Mr Browne on 6th December to enquire about this aspect being raised. In reply, Mr Browne promptly provided a map (referred to in Appendix A MF 5) and description of his views and I review these new matters here.

3.5.10 Effects from Bradmore Way (BB1): Mr Browne states,

"....your viewpoint 2 is set quite far back from the proposed site (approximately 45m). I will be using a viewpoint that was taken approximately 10m away from the site boundary to show the full extent of potential effects"

Mr Browne appears to suggest standing almost on the Appeal Site boundary will show the full extent of the potential effects; however, I assume what he means is the full extent of the Appeal Site. Bradmore Way is a road that extends a much greater distance back in a suburban context towards the railway station, within the settlement core. The kinetic/ transitory changes in view for most users of Bradmore Way approaching the Appeal Site will be primarily when utilising the loop road via Peplins Way and therefore it is entirely appropriate to consider the full extent of potential effects along the streetscene, not just standing static in one location at the very end of the street (as Mr Browne has). I do not consider 45m to be quite far from the Appeal Site in the context of carrying out an LVIA. The purpose of the LVIA is identify and address the visual effects from the receptor (i.e. the streetscene) as a whole, which quite clearly diminish with distance as was set out clearly in the LVIA, and I accept they are more apparent next to the Appeal Site, than they are further back along the street. Nevertheless, I have taken some additional photographs from points along Bradmore Way (Appendix A MF6, Sheet 1 A-D).

3.5.11 Effects from Peplins Way (BB2, BB3): For both locations, Mr Browne states,

“This is an additional viewpoint from which the site will be visible”.

Once again, as set out above (3.5.4) the LVIA set out the sphere of visibility clearly (3.5.3), as being “*glimpses and gaps in built development edge along Peplins Way and Bradmore Way*”. The LVIA (6.3.13) then assessed the effects from this receptor (the streetscene), taking fully into account the 2 gaps in between buildings that Mr Browne claims are now additional. To be of reassurance, it should be noted that both Mr Browne’s ‘views’ are across long back gardens with trees from within the suburban area, and then across the southern boundary buffer planting and public open space. Nevertheless, I have taken some additional photographs from points along Peplins Way (Appendix A MF6, Sheet 13 Q-T).

3.5.12 Effects from Brookmans Park golf course (BB4): The private golf course sits in a largely developed context, fringed by housing along Brookmans Avenue, Bradmore Way and Chancellors School, although the northern boundary is open. Whilst the golf course retains some structure associated with the trees and copses of the former parkland estate, it is now a developed landscape and as GLVIA3³⁷ refers to views from sports facilities are of low susceptibility, unless they involve or depend upon an appreciation of views of the landscape³⁸. In this regard, I find it very unlikely that golfers will go intentionally to the lowest part of the course (5th hole) identified by Mr Browne (BB4) to deliberately peer through the tree boundary and appreciate the wider landscape from here, when their attention is focussed on the game. The most likely scenario is that they would utilise the more elevated ground from which to appreciate longer distance views across the landscape (from the clubhouse (former stable block) or indeed the terrace/ siting of the former mansion with long elevated views (as was highlighted in the LCA); as such, more elevated views may include the villages in context below depending on the orientation of that view. Furthermore, and

³⁷ GLVIA3 6.34 and 6.35, p.114

³⁸ GLVIA3 para 6.34, page 114

in context, the breadth of the golf course covers a large extent and, at the foot of the slope, existing housing already extends along much of the course's western edge (backing on to rear gardens on Bradmore Way) and its southern edge (Brookmans Avenue) such that the presence of built form is already present and an established part of the character of much of the golf course's edge (Appendix A MF6, sheet 14 and 15). In addition, I emphasise that I have already taken into account views from the golf course within the LVIA at para 6.3.9 (even attributing it a moderate sensitivity to reflect more sloping ground away from the boundary); however, I appreciate that to peer through the Appeal Site boundary at close quarters from the 5th hole in winter prior to planting will result in filtered views, whilst from other more susceptible locations³⁹ there will be no view at all. As such the proposed development will be entirely in context and character with the existing wider boundaries of the golf course which already adjoin the settlement edge in many places.

3.5.13

In conclusion, Mr Browne's 4 'additional' views are of little assistance (or conversely they may assist in confirming how little visual influence the Appeal Site has). In the context of LVIA and dealing with the Council's reason for refusal, which does not allege visual harm (although the SoC and committee report do mention it), the additional views posed by Mr Browne have either been addressed within the LVIA or are simply photos taken from a slightly different position to mine. Either way, the provision of 4 photos from locations already addressed previously as receptors, does not demonstrate any further concerns surrounding any harm extending beyond the immediate locality and into the wider landscape other than that which has already been identified. As I maintain, the character or integrity of the LCA which is the chief new issue being raised, is demonstrably not affected by any intervisibility in the landscape beyond the immediate area.

Summary of Visual Effects

3.5.14

It is common ground that there are no visual effects arising from the west or north of the Appeal Site (Landscape SoCG 5.3/5.4). This is supported by photographs taken

³⁹ GLVIA3 para 6.35, page 114

from roads and footpaths close to the Appeal Site (Appendix A MF5 and MF6 Sheets 2-8, photos E-K).

- 3.5.15 It is acknowledged that there are limited effects arising, including from filtered views at the boundary, from the 5th hole of the golf course. There are no views from elevated parts of the golf course where susceptibility is higher (including the former terrace (Appendix A MF5 and MF6 sheet 11, photo N). As set out in the LVIA (6.3.9), this is a slight adverse effect overall, and Slight Adverse to Negligible following establishment.
- 3.5.16 It is acknowledged that there are effects arising at the settlement edge close to the Appeal Site, as set out clearly in the LVIA. These are residential properties in Peplins Way (LVIA 6.34) and Bradmore Way (LVIA 6.35) with Moderate or Slight Adverse Effects, reducing to Slight or Negligible following establishment.
- 3.5.17 It is acknowledged that there are effects arising from short sections of highway (for pedestrians, cyclists or cars) near the Appeal Site, as set out in the LVIA. These are Peplins Way (LVIA 6.3.13) and Bradmore Way (LVIA 6.3.10). I must acknowledge that the scores for these two roads appear to be the wrong way round in the LVIA, and thus the scoring should read Moderate Adverse (yr1) and Slight Adverse (yr 15) for Bradmore Way, and then Slight Adverse (Yr 1) and Negligible (Yr15) for Peplins Way. Nevertheless, as set out above and in the LVIA, the effects are largely limited to the Appeal Site boundary and diminish quickly with distance, as shown in the photographs (Appendix A MF5 and MF6 sheet 1 (photos A-D) and 13 (photos Q-T).

The Visual Effects of Loss of Openness to the Green Belt

- 3.5.18 Russell Gray deals with Green Belt in the planning proof and covers the spatial aspects of Green Belt and the Green Belt purposes. My evidence covers the visual effect on openness.
- 3.5.19 LLA set out the background to the Local Plan and Green Belt studies prepared for the Examination as part of a Green Belt Review (CD1.30) for the planning application. To summarise,

Para 2.1.6: (Stage 1 Strategic Green Belt Review) “*the Composite Scoring Against Green Belt Purposes of the SKM Stage 1 Green Belt Review is contained at EX38 of the Examination Documents, which identifies SKM Parcel 45 to the north of Brookmans Park as being in an area of least harm to the Green Belt anywhere in the Borough*”.

Para 2.1.9: (Stage 2 Site specific Green Belt Review) “*...scoring from the Stage 2 Green Belt assessment is a granular assessment of all sites which had been found “suitable, available and achievable” in the Council’s SHLAA (“Phase 2 Review – sites outside urban area” report, December 2014). BrP12 (the Site) was found to be in the category of least harm in the borough if released from the Green Belt*”.

Para 2.1.17: (Stage 3 LUC Green Belt Review) “*assessed by LUC to be a parcel which performed towards the lower end of the Green Belt purposes in the District and, although scoring a Moderate-High harm rating, LUC acknowledged that even for the larger Parcel P66, “...the parcel is well contained by urban development and protected woodlands, so the impact of its release on the integrity of the wider Green Belt would be limited”*”.

3.5.20

Inspector Middleton in his assessment of the Appeal Site, acknowledges the Appeal Site’s containment,

“The site is immediately to the north of existing development at Peplins Way, through which it would gain access. Its western and much of its northern side are contained by Peplins Wood and there is woodland a short distance to the east across a part of the golf course. The LUC study noted these elements of containment and also found that the sub parcel was more strongly contained by the existing built development than the larger parcel⁴⁰.”

⁴⁰ Local Plan Examination Document: EX273 Stage 9 Round up notes; para 116, p.25 (CD 6.71)

3.5.21 The Inspector also acknowledged that the Appeal Site, being a smaller component of a larger parcel (P66) would result in less harm when considered on its own when referring to LUCs report,

“It also found that the GB harm that could result from release of the site would be more limited than the whole parcel. These considerations are more acute in the context of the proposed site than in the context of the sub-parcel as a whole. Consequently, if it had been separately assessed, its rating could have been different⁴¹. Whilst the assessment comments that the development of the whole sub-parcel would lead to greater containment of the golf course to the south, weakening its contribution to the GB, the golf course is to the east of the site and not the south. It is also screened from much of the golf course by vegetation”.

3.5.22 Within the site itself, inevitably there will be a loss of open countryside, as a piece of open agricultural farmland is replaced by housing and new greenspace resulting in a loss of openness in spatial terms. The Illustrative landscape masterplan shows how the Appeal Site will work in terms of development and open space. Within the site itself there would inevitably be some harm to the visual aspects of openness of the Green Belt, but this would be the case for any development. The requirement is therefore to consider the visual effects of openness in the context of the wider area.

3.5.23 At this point it is worth noting that it is common ground that there are no long distance views from where the Appeal Site or development would be seen (landscape SoCG 6.2). Furthermore, it is also common ground that the appeal scheme will lead to a loss of openness on the Appeal Site itself (Landscape SoCG 6.3). In addition, it is agreed that the visual impact of the proposed scheme is localised (Landscape SoCG 5.2), and that there are no visual effects arising from either the north or west (Landscape SoCG 5.3 or 5.4). Therefore, there are only effects from within the urban area (Landscape SoCG 5.5 and 5.6) and the very edge of the golf course (Landscape

⁴¹ Local Plan Examination Document: EX273 Stage 9 Round up notes; para 116, p.25 (CD 6.71)

SocG 5.7). I therefore cannot understand why Mr Browne therefore disagrees that the change in openness will be largely restricted to within the Appeal Site itself, or that the integrity of the wider Green Belt will remain intact (Landscape SoCG 7.9 and 7.10).

- 3.5.24 The visual effects of openness relative to the wider area are evidently much more limited and best appreciated by reference to the photo locations that accompanied the LVIA and the updated photographs appended to this proof (Appendix A MF5 and MF6).
- 3.5.25 The photo locations are particularly helpful at informing the effects on visual openness in the Green Belt beyond the site. The Council has not highlighted any issues with visibility being wider than the limited and localised ones appraised in the LVIA and nor has visibility been raised as a Reason for Refusal. There is common ground (Landscape SocG 5.3, 5.4) in respect of views to the west and north of the Appeal Site (Appendix A MF5 and MF6, sheets 2-8, photos E-K). Furthermore, Mr Browne's 'additional' views confirm to me that the effects on visual openness are limited, since his concerns regarding the golf course appear to be limited/ focussed on the boundary edge of the Appeal Site itself (a photo location on the boundary) and the remaining views are from within the built settlement where changes to openness are already part of the fabric of the built environment.
- 3.5.26 The proposed scheme does increase the extent of built development, which will be an inevitable spatial change that will change the openness of the Green Belt at the edge of the settlement. However, it is recognised that the Appeal Site is well contained by existing features, including Peplin's Wood to the north, the embanked mainline railway to the west, adjacent settlement to the south, whilst to the east the land is contained by strong planting and landform, providing a wooded backdrop. Therefore, there is a very limited change to visual openness arising from the proposed scheme in the wider landscape, such that the integrity and openness of the wider Green Belt can be maintained without harm.
- 3.5.27 Taking into account Inspector Middleton's acknowledgement (in the text above) above that much of the golf course is screened by vegetation, there may be a limited effect on visual openness for users of the golf course more apparent in winter, but

this is close to the Appeal Site boundary (as Mr Browne's new photo location suggests). Meanwhile, a short section of Bradmore Way (and to a lesser degree Peplins Way) would experience some change as road users pass near the site; however, from these receptors any change to openness will be seen in context with (and from within) the existing built environment of the settlement itself.

3.5.28 It is inevitable that all Green Belt sites would result in a change in openness of the land itself, but as the Local Plan Inspector concluded development on this Appeal Site can be successfully screened thereby,

"...removing any impact that it would otherwise have on the wider Green Belt to the north east...".

3.5.29 As set out earlier in this proof the proposed scheme makes use of existing strong, permanent and defensible boundaries and also provides a new boundary feature along the gap in the north east boundary beyond two rear gardens and a timber scout hut, where new woody planting will connect semi natural habitat between the Peplin's Wood and the golf course and provide a strong new boundary feature. As such, the proposed scheme will result in a narrower edge than the existing settlement edge, comprising lower height single pitch scout hut and two 2 storey properties, compared with the existing mixed 2 and 3 storey edge. When combined with the strong new connecting landscape feature between Peplin's Wood and the golf course, this will ensure a more sensitive transition into the landscape.

3.5.30 Beyond the developable footprint, the design of the scheme also includes a number of landscape and ecological measures set out above, which contribute to paragraph 145 of the NPPF and the overarching aims of the PPG including,

"new or enhanced green infrastructure; woodland planting; improvements to biodiversity, habitat connectivity and natural capital; new or enhanced walking and

cycle routes; and improved access to new, enhanced or existing recreational and playing field provision⁴².

⁴² PPG: Paragraph: 001 Reference ID: 64-001-20190722

4 SUMMARY OF PROOF AND CONCLUSIONS

4.1 Summary and Conclusions

4.1.1 Brookmans Park is a modern commuter village established in around 1935, when the Brookmans Park Estate (comprising a former parkland owned by the Gausson family until 1923) was sold off to developers, who wanted to create a modern settlement within easy reach of the City, accessible by train.

4.1.2 The Appeal Site itself comprises an open irregular shaped agricultural field, with a gentle gradient across the Site that falls from northeast to the west. The more elevated land to the east has seen the location of a number of different features over the years, including the BBC's Brookmans Park Transmitter Station built in 1928-29 and lying adjacent to the east side A1001 Great North Road; meanwhile, Brookmans House (the Gausson's residence) which overlooked the former parkland estate to the southwest, has long since been demolished (after a major fire in 1891), within part of the golf course and clubhouse facilities.

4.1.3 The proposed scheme shown on the illustrative landscape masterplan incorporates the following,

- Retention, management and enhancement of the existing mixed native vegetation and mature trees beyond the Site boundaries, together with new trees to create more diversity and structure and connectivity of green infrastructure.
- The existing gap in the north east corner of the Site will be planted with mixed native hedge and trees to provide a wildlife buffer connecting corridor between Peplin's Wood and the golf course, forming a strong robust boundary.
- Creation of a strategic buffer that would be fenced to prevent access and to provide an offset of at least 15m (in line with Natural England requirements). In reality, the carefully designed proposals ensure a much more significant buffer

has been provided ranging from a minimum of 15m and up to 70m to the development edge, comprising new landscape features, including species rich grassland, woodland and native scrub planting.

- Set back development from the eastern boundary and strengthen the landscape buffer alongside the existing edge with new hedge, scrub and tree vegetation adjacent to Brookmans Park Golf Club.
- Ensure an appropriate offset from the settlement edge north of Peplins Way and Bradmore Way, to allow for new tree planting and features (such as orchard trees and species rich grassland) within areas of open space. This will ensure a soft interface with the rear gardens extending along Peplins Way and help reinforce character, as well as connecting the southern spur of Peplin's Wood with the golf course for wildlife and biodiversity reasons.
- Provision of wildlife friendly SUDs features, within open space including species rich planting and longer grass, including meadow and/or heathy grass to enhance the biodiversity and landscape characteristics of the area.
- Provision of native trees, as well as orchard trees, by including 'heritage apple' trees within species rich grassland throughout the layout.
- Provision of attractive areas of public open space (including 2no. play spaces) that promote creative play and increase connectivity and circulation, for the health and wellbeing of the local community. The provision of doorstep and local play elements will include natural and rural character features for play areas, as well as trim trail features with a variety of activities aimed at a range of age groups.

4.1.4

The design of the proposed scheme ensures permeability, legibility and connectivity. The design will continue the streetscene and existing character of Bradmore Way (which includes pedestrian paths set behind the verge) by extending it further into the site. As a result, the existing vista along Bradmore Way remains well connected and legibility is maintained, so that people can still appreciate the view of the woodland along the road. In addition, most of the internal roads within the layout allow for outward vistas and views towards the existing wooded backdrop on higher ground.

The scheme also provides public access, which includes circular walks that will allow people more to appreciate more of the woodland and its edge from close up, rather than from a single distant point towards the end of Bradmore Way.

4.1.5 Although there will be a loss of grassland, the scheme includes the following new elements that have been developed with the scheme ecologist, to increase the landscape resource of the Appeal Site and to provide added wildlife and biodiversity benefits,

- c.360 metres of new native mixed species hedgerow.
- c.1.18 hectares of new native mixed species broadleaved woodland.
- c.2.55 hectares of species rich modified grassland (wildflower meadow).
- c.0.25 hectares of wetland planting, including aquatics, wetland meadow. grass for the SUDs basin.
- In excess of 185 new trees, comprising a mixture of street trees, focal trees and orchard trees (such as heritage apple).

4.1.6 It is considered that the scheme is of high quality design, the outline layout shows one way in which this can be delivered and there is no reason for the Council to consider that the proposed scheme would not be of high-quality design as required by saved Policy D1. The character and context of the built area is predominantly two storey residential homes set within the existing settlement of Brookmans Park. The development of the Appeal site will therefore inevitably bring a change to the agricultural field but in all other respects the scheme will be consistent with the character and context of the existing area that satisfies D2 and RA10.

4.1.7 The outline scheme prepared by Ashby Design has been landscape and ecologically led, it has been carefully considered and illustrates one way a high quality scheme can be delivered for this Appeal Site. It carefully considers the opportunities and constraints associated with the Site and context, it is very well related to and well

connected with the settlement of Brookmans Park, it is well contained by existing features that would all be retained, including the well vegetated (embanked) railway line, woodland (Peplin's Wood and The Legg), as well as a golf course and enclosed by a rising landform. The scheme includes new open space, green infrastructure, as well as public access which will serve the new and existing local community.

4.1.8 Overall it is considered that the design of the scheme also successfully delivers on the points required as part of policy SP9 Placemaking and High Quality Design.

4.1.9 There will inevitably be a degree of localised harm on the landscape of the Appeal Site itself in this location as there will be a loss of agricultural grassland and the open character of the site itself will change, but it is not harmful to the character of the area because;

- The Appeal Site is position on the inward facing landform against the railway line, contiguous with the modern (visible) settlement pattern to the south.
- The existing presence of a well-established settlement edge and railway line are features that impart suburban characteristics across the Appeal Site. The golf course represents a modern land use within a wooded framework to the east.
- There would be no loss of existing distinctive features of value such as trees, woodland or hedgerows. Furthermore, existing mature belts of woodland in the wider landscape beyond the Appeal Site will continue to form the strong framework and backdrop for the proposed development, in exactly the same way that they do now for the existing settlement.
- Extended, restored or new landscape features forming new structural landscape elements equates to a much greater landscape resource within the Appeal Site than currently exists.
- The development comprises new tree planting (including street trees), together with native hedgerow planting (either as infill, supplementary or new sections), native shrub planting, tussocky (species rich) meadow grass, amenity grass and amenity space with shrub and ground cover beds for residents that delivers some key characteristic features associated with the LCA.

4.1.10 Accordingly, the effects of the development on the landscape will be limited and localised.

4.1.11 The Council's Reasons for Refusal do not allege visual impact, I agree.

- Views from the north are well contained by the immediately adjacent Peplin's Wood. Potential longer views from land to the north and west are well screened by further vegetation associated within the well wooded context, which reinforce the prevailing landscape pattern within the wider landscape beyond the settlement.
- Views from the west are contained by a combination of part of Peplin's Wood, which runs parallel alongside the elevated railway embankment of the East Coast mainline, which separates the Site from the wider landscape to the west. Views into or across the Site from the railway lines are screened by the well-established Peplin's Wood.
- The combination of hedgerow boundaries with mature trees on the west facing landform associated with the man-made golf course, generally limits views from the east to localised views from within Brookmans Park Golf Club close to the boundary.
- The presence of the settlement to the south, limits visibility to a series of relatively short distance views in the local area. To the south of the Site, existing houses forming the settlement edge are set in mature garden, serve to heavily filter and fragment views from the south, limiting many views to glimpses and small gaps in built development edge along Peplins Way and Bradmore Way.

4.1.12 The Council has not highlighted any issues with visibility being wider than the limited and localised aspects that were appraised in the LVIA and nor has visibility been raised as a Reason for Refusal.

4.1.13 The proposed scheme does increase the extent of built development, which will be an inevitable spatial change that will change the openness of the Green Belt at the edge of the settlement. However, it is recognised that the Appeal Site is well contained by

strong and permanent features, including woodland to the north, the embanked mainline railway to the west, adjacent settlement to the south, whilst to the east the land is contained by strong planting and the golf course.

- 4.1.14 Therefore, there is a very limited change to visual or spatial openness arising from the proposed scheme in the wider landscape, such that the integrity of the wider Green Belt can be maintained without harm.
- 4.1.15 There will be no physical or perceptual reduction in the gap affecting coalescence between Brookmans Park and Welham Green.
- 4.1.16 For all the reasons stated above and taking into account the evidence provided to support the aspects associated with landscape and visual issues, the LVIA and issues associated with openness, I am satisfied that all matters have been satisfactorily addressed and as such there is no reason why the proposed scheme should not be granted planning permission.
-

Stansted:
Unit 1, The Exchange,
9 Station Road,
Stansted, CM24 8BE

t +44 (0)1279 647044
e office@lizlake.com
www.lizlake.com

Bristol:
1 Host Street,
Bristol, BS1 5BU

t +44 (0)117 927 1786
e office@lizlake.com
www.lizlake.com

Nottingham:
3 Newcastle Chambers
Angel Row
Nottingham
NG1 6HL
t +44 (0)115 784 3566
e office@lizlake.com
www.lizlake.com

LIZ LAKE
ASSOCIATES
LANDSCAPE ARCHITECTS

- Landscape Design
- Urban Design
- Residential
- Public Realm
- Masterplanning
- Landscape Planning
- Heritage Landscapes
- Gardens and Estates
- Restoration and Conversion
- Places of Worship
- Expert Witness
- Hospitality
- Education
- Retail / Office
- Community
- Ecology
- Arboriculture
- 3D / Graphic Design