

Land North of Bradmore Way, Brookmans Park

Proof of Evidence – Effects on the Character, Appearance, and Openness of the Green Belt

Appeal by Aurora Properties (UK) Limited

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Robert Browne Proof of Evidence

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1 Introduction

1.1 Qualifications and Experience

- 1.1.1 This evidence has been compiled by Robert Browne, Director at Wynne-Williams Associates, a firm of Chartered Landscape Architects, registered with the Landscape Institute.
- 1.1.2 I hold a BSc (Honours) degree in Geography, an MA in Landscape Architecture, and I am also a Chartered Member of the Landscape Institute (CMLI). I have over 6 years' experience in both planning and design projects across the commercial, residential, education, and care sectors. I specialise in landscape planning work and regularly produce landscape and visual impact assessments (LVIAs), townscape and visual impact assessments (TVIAs), landscape character assessments (LCAs), site appraisals including Green Belt Assessments, and provide expert evidence for planning appeals on behalf of both appellants and Local Authorities. The scale of my work varies from sites including a single proposed dwelling to advising on the effects of Nationally Significant Infrastructure Projects (NSIPs).
- 1.1.3 I understand my duty to the Inquiry and have complied with and will continue to comply with that duty. The evidence that I have prepared and provide for this Inquiry is true. My evidence has been prepared and is given in accordance with the guidance and code of conduct of the Landscape Institute. I confirm that the opinions given are my true and professional opinions.

1.2 Scope of my Evidence

- 1.2.1 In November 2022, I was appointed by Welwyn Hatfield Borough Council (WHBC), to prepare evidence for this Inquiry.
- 1.2.2 In a decision notice dated 5th August 2022, WHBC refused permission for "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)". The site is located on Land North of Bradmore Way, The Brookmans Estate, Brookmans Park.
- 1.2.3 The Decision Notice sets down six reasons for refusal of the application. My evidence relates to reasons 1 and 2 only:

- 1.2.4 **Reason for Refusal 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.”
- 1.2.5 **Reason for Refusal 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.”
- 1.2.6 I have reviewed the relevant application documents and applicable policy documents, and I have made a site visit to appraise the appeal site and its environs in terms of landscape character and visual impact. My evidence provides my professional opinion on the potential effects of the appeal scheme on the existing landscape character and appearance, as well as the openness of the Green Belt.

1.3 Guidance Used in Compiling my Evidence

- 1.3.1 I have used the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) published by The Landscape Institute and the Institute of Environmental Management and Assessment (C.D 8.46) in the preparation of my evidence.
- 1.3.2 I have also used Landscape Institute Technical Guidance Note TGN 02-21: ‘Assessing Landscape Value Outside National Designations’ (C.D 8.44) to inform my assessment of landscape value for the site and surroundings.

1.4 Appeal Documents Reviewed

- 1.4.1 Landscape and Visual Impact Assessment REV Final (Liz Lake Associates April 2022)
- 1.4.2 Green Belt Review (Liz Lake Associates April 2022)
- 1.4.3 Illustrative Site Layout Plan (Ashby Design March 2022)

- 1.4.4 Illustrative Massing Study (Ashby Design March 2022)
- 1.4.5 Illustrative Green Spaces Plan (Ashby Design March 2022)
- 1.4.6 Illustrative Site Sections (Ashby Design March 2022)
- 1.4.7 Illustrative Visuals (Ashby Design March 2022)
- 1.4.8 Landscape Masterplan REV B (Liz Lake Associates March 2022)
- 1.4.9 Design and Access Statement (Aurora Properties Ltd/Ashby Design May 2022)

1.5 Structure of my Evidence

- 1.5.1 My evidence is structured as follows.

Section 2 considers the planning policy context in relation to landscape issues.

Section 3 explains the methodology used for assessing the impact of the development.

Section 4 presents the existing landscape setting to the site and its character.

Section 5 sets down the effects of the proposals on landscape as a resource and character.

Section 6 considers the visual effects of the proposals.

Section 7 examines the effects of the appeal scheme on the openness of the Green Belt.

Section 8 is a summary and conclusion to my evidence.

2 Planning Policy Context

2.1 Introduction

- 2.1.1 In this section I consider the relevant landscape related policies at national and local level.

2.2 National Planning Policy Framework (NPPF)

- 2.2.1 The areas of the NPPF relevant to landscape, character, and appearance with regards to this appeal are listed below:
 - 2.2.2 Paragraph 130
 - 2.2.3 Paragraph 137

2.2.4 Paragraph 138 (Purpose C)

2.2.5 Paragraph 147

2.2.6 Paragraph 174

2.3 Local Planning Policies

2.3.1 Local planning policies relevant to this appeal related to Green Belt, landscape character and appearance, are listed below.

2.3.2 Welwyn Hatfield District Plan 2005

2.3.3 Policy GBSP1 - Definition of the Green Belt

2.3.4 Policy D2 - Character and Context

2.3.5 Policy RA10 - Landscape Regions and Character Areas

2.3.6 Welwyn Hatfield Borough Council Draft Local Plan Proposed Submission August 2016

2.3.7 Policy SP9 - Place Making and High Quality Design

3 Methodology

3.1.1 'Development' is defined in the GVLIA3 as 'any proposal that results in a change to the landscape and/or the visual environment'. My evidence considers both the landscape character and the visual environment and the impact that the proposed development would have on both.

3.1.2 The GLVIA3 methodology requires 'establishing the baseline landscape and visual conditions (which) will, when reviewed alongside the description of the development, form the basis for the identification and description of the landscape and visual effects of the proposal' (para 3.15 page 32).

3.1.3 The landscape baseline is defined with the aim to 'provide an understanding of the landscape in the area that may be affected – its constituent elements, its character and the way that this varies spatially, its geographic extent, its history, its condition, the way the landscape is experienced, and the value attached to it' (para 3.15 page 32).

- 3.1.4 I have reviewed the existing studies which seek to establish the baseline landscape character and sensitivities for the site and the surrounding area. I have also undertaken a site visit to verify the extent to which the site is typical of these studies and the degree to which the development would impact on the existing landscape. This evidence sets out the results of these reviews in Sections 4 and 5.
- 3.1.5 The visual baseline study has the 'aim to establish the area in which the development may be visible, the different groups of people who may experience views of the development, the places where they will be affected and the nature of the views and visual amenity at those points.' (para 3.15 page 32).
- 3.1.6 GLVIA3 defines the value of a given landscape as 'The relative value that is attached to different landscapes by society' (para 5.19 page 80) and provides a range of factors that can help in the identification of valued landscapes. However, the Landscape Institute have subsequently published a detailed Technical Guidance Note on Assessing Landscape Value Outside of National Designations (TGN 02/21) in February 2021. This guides my methodology for assessing the landscape value of the site, which in turn forms part of my landscape sensitivity opinion of the site. Landscape value is considered in Section 4.
- 3.1.7 GLVIA3 also provides guidance on assessing the significance of landscape effects. This requires the consideration of the sensitivity of landscape receptors (defined aspects of the landscape that have the potential to be affected by the proposal).
- The sensitivity of a landscape is defined in GLVIA3 as the combination of the site and its surroundings' susceptibility and value. Susceptibility is 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' (pages 88 and 89 para 5.40). I consider the susceptibility and sensitivity of the site and its surroundings in Section 5.
- 3.1.8 Where possible, my assessments of potential landscape and visual effects have been determined using the criteria and definitions from the Liz Lake Associates Methodology for Landscape and Visual Impact Assessment (see my Appendix C). This is the methodology used by the consultants responsible for the Appellant's LVIA. The detailed methodology

was not originally submitted with the planning application, but was kindly provided by the Appellant's landscape witness upon request. The aim of basing my assessments on this methodology is to provide consistency in the terminology and scales of effects used within the Inquiry. This is intended to aid the Inspector in their consideration of the evidence.

4 Existing Landscape Character

4.1 Introduction

4.1.1 In this section I consider the existing baseline studies which have been undertaken for the site and surrounding area, the extent to which the site is typical of those studies, and the value of the landscape of the appeal site and its surroundings.

4.2 Landscape Character Baseline Assessments

4.2.1 The site is located within the study area of several landscape character assessments ranging from a national to local scale. Each study provides baseline descriptions of the landscape character.

4.2.2 **Natural England National Character Area (NCA) 111 Northern Thames Basin (C.D. 8.26)**

4.2.3 At a national scale, the appeal site lies within NCA 11 Northern Thames Basin. This overview assessment covers a long corridor of land from Watford in the west to Harwich in the east.

4.2.4 The Appellant's LVIA includes the full list of key characteristics from the Natural England report. Due to the broad scale of descriptions in the assessment, not all of the key characteristics can be observed in the area immediately surrounding the site. However, it is still useful for understanding the wider context of the appeal site. There is one additional element of the assessment that should be highlighted. In a section titled 'Cultural Services', the report's authors highlight the role that ancient woodland performs in providing a sense of time depth, "A strong sense of history is captured in the ancient woodlands (Page 17).

- 4.2.5 **East of England Landscape Typology 2010 – Wooded Hills and Ridges** (available online <http://landscape-east.org.uk/lct/wooded-hills-and-ridges>)
- 4.2.6 This is a regional-scale assessment, commissioned by Landscape East, that provides an overview of landscape character within East Anglia. The Appellant's LVIA correctly references this document and includes full text descriptions for the typology assigned to the appeal site, the Wooded Hills and Ridges, as well as the adjacent typology, the Lowland Settled Farmlands. This is good practice when a site is located close to the boundary between character areas or typologies.
- 4.2.7 Despite the strategic nature of the Landscape East assessment, the site and surroundings display a large number of the highlighted characteristics, particularly from the Wooded Hills and Ridges typology. Prominent characteristics from this typology observed in the vicinity of the appeal site include:
- “A varied and textured landscape characterised by undulating hills and steep ridges, which are cloaked in woodland, with clearings of arable farmland and pasture” (overall description).
 - “A combination of heavy, gleyed soils supports a high cover of ancient deciduous woodland. Survival of Ancient Woodland is relatively high, much of which is found in large blocks” (vegetation and land use).
 - “Mixed farming (pasture and arable) between extensive areas of woodland. Some peri-urban land uses including horse grazing, golf courses and country parks” (primary land use).
 - “Frequent, often large ancient woodlands, in places associated with parkland” (tree cover).
 - “Settlement is densely dispersed, with many linear clusters along roadsides. The influence of towns (both new developments and vastly expanded historic settlements) are also a feature within this landscape” (settlement pattern).
 - “The hilltops and lanes are relatively tranquil, however near to settlements and road infrastructure tranquillity reduces considerably” (tranquillity).

4.2.8 Hertfordshire Landscape Character Assessment 2003 – Area 54: Potters Bar Parkland (C.D. 8.16)

4.2.9 The appeal site is located within Area 54 of this county level assessment, the Potters Bar Parkland. The Appellant's LVIA includes large extracts from the assessment, including the list of key characteristics . However, the LVIA does not highlight other relevant elements from the character assessment:

- “The Brookmans Park golf course contains historic parkland trees. Fenced and walled estate boundaries can still be found and the ornamental garden planting can still be seen in the linear wood called The Legg, west of Bell Bar” (Page 227).
- “Repton worked on the grounds of Brookmans Park, part of which survives as a golf course” (Page 228).
- Under a sub-heading of ‘Community Views’, the report states “the distinctiveness of this area, and in particular the Gobions site, is highly valued”.

4.2.10 Development of Evidence for Welwyn Hatfield Local Plan: Landscape Sensitivity Assessment 2019 (see my Appendix D)

4.2.11 This finer grained assessment was carried out by Land Use Consultants with the aim of considering the sensitivity of the Welwyn and Hatfield Borough to built development. It uses the broader landscape character areas identified in the Hertfordshire Landscape Character Assessment and then further sub-divides each area. The appeal site sits within Area 54b Brookmans Park. This assessment was not referenced within the Appellant's LVIA. Relevant extracts include:

- “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 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" (Page 212).

4.2.12 The report identifies key sensitivities and mitigation potential on the edge of Brookmans Park 54b. It states, "To minimise adverse impact on landscape and visual character, development proposals should:

- Ensure development is not placed on slopes that are visually prominent in the wider landscape.
- Avoid damaging parkland character and protect BAP Priority Habitat deciduous woodlands as well as hedgerows and other semi-natural features.
- Maintain and enhance connectivity between natural landscape elements, avoiding containment of sizeable areas, such as Brookmans Park Golf Course, by development.
- 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." (Page 213).

4.3 Observed Landscape Character

4.3.1 The baseline landscape character and sensitivity studies provide useful contextual descriptions and guidelines for development. However, to fully appreciate the existing character, it is also important for me to outline the additional characteristics I have observed during my site visit.

4.3.2 The appeal site is located within the Green Belt on grassland north of the Brookmans Park estate. From the end of Bradmore Way, the best publicly assessable vantage point to view the site, the stark contrast between the undeveloped field and suburban built form of the village is readily apparent. Peplins Wood ancient woodland is a strong feature forming the western and most of the northern boundaries of the site. A narrow tree line and hedgerow extend along the eastern boundary, separating the site from Brookmans Park Golf Club to the east. Approximately 100m of the north-eastern boundary is open, providing views to grassland on a higher contour and a narrow limb of Peplins Wood that connects with The Legg, a linear woodland and local wildlife site north-east of the site.

- 4.3.3 The agricultural land use, boundary trees, and lack of built form combine to create a strong rural character for the site. The suburban character of the Brookmans Park estate to the south does slightly intrude to introduce the perception of this being the edge of settlement. However, as the site topography rises away considerably from the end of Bradmore Way, the adjacent suburban character intrusion is limited to a small portion of the site.
- 4.3.4 Much of the Brookmans Park settlement is characterised by inward facing two-storey detached and semi-detached housing from the 20th Century and there are very few places to appreciate the rural setting of the village. The appeal site therefore performs an important role in revealing the rural setting to Brookmans Park and creating a unique sense of place distinct from other settlements in the area. I agree with the Appellant's LVIA when it states, "the backdrop of mature wooded blocks surrounding the settlement fringes, providing an attractive backdrop, and are typical features contributing to the wider landscape setting of the village" (Page 16, paragraph 3.4.4).

4.4 My Assessment of Landscape Value

- 4.4.1 To assess the value of the appeal site and surrounding landscape, I have used the latest guidance from the Landscape Institute, TGN 02-21: Assessing Landscape Value Outside National Designations (C.D 8.44). The technical note stresses that: "When assessing landscape value of a site as part of a planning application or appeal it is important to consider not only the site itself and its features/elements/characteristics/qualities, but also their relationship with, and the role they play within, the site's context" (paragraph 2.4.5 Table 1 notes).
- 4.4.2 Below I have assessed the site and surroundings against the indicators of landscape value identified in TGN 02-21:
- 4.4.3 Natural Heritage**
- Peplins Wood ancient woodland is an important feature of natural heritage. The woodland is a valued natural capital asset and contributes to the rural setting of Brookmans Park. It is also a local wildlife site (LWS ref 78/021), forming part of a wider green infrastructure network connecting with The Legg (LWS ref 70/088).

4.4.4 Cultural Heritage

Some elements of parkland landscapes relating to previous estates are still present in the vicinity of the site, including parkland trees within the Repton landscape of Brookmans Park Golf Club. The ancient woodland at Peplins Wood is also an important feature for appreciating time depth in the landscape. The site does not form part of the setting for any listed buildings or features.

4.4.5 Landscape Condition

The appeal site is in moderate physical condition, with some areas showing signs of active landscape management.

4.4.6 Associations

The adjacent Brookmans Park Golf Club is situated on a landscape that was originally designed by Humphry Repton, a notable landscape designer in the 18th and 19th Centuries. This holds some value by association. I can find no other evidence of associations between notable people, events, or the arts and the appeal site or surroundings.

4.4.7 Distinctiveness

As outlined previously, the site and surroundings display multiple elements of the characteristics highlighted in the local and regional landscape character assessments. In addition, the site makes a crucial contribution to the rural setting and distinctive character of Brookmans Park village.

4.4.8 Recreational

4.4.9 There is no direct access to the site for recreation. However, views towards the undeveloped grassland and woodland on raised topography form a backdrop for walkers along the public footway and users of the adjacent golf course. Public rights of way 033 and 035 provide access to further rural land north of Peplins Wood and The Legg, approximately 200m north of the appeal site.

4.4.10 Perceptual (Scenic)

The site itself has many pleasant aesthetic elements that can be experienced from the public footway at the end of Bradmore Way and from private views within Brookmans Park Golf Club through the boundary vegetation.

4.4.11 Perceptual (Wildness and Tranquillity)

Elements of perceived tranquillity can be experienced from the public rights of way north of the site, but not within the developed residential area of Brookmans Park. The site does provide a perceived link to nature from the built edge of the settlement.

4.4.12 Functional

Peplins Wood makes a contribution to the healthy functioning of the landscape, offering considerable green infrastructure and visual amenity.

4.4.13 Summary assessment of landscape value

The Appellant's LVIA methodology correctly references TGN 02-21: Assessing Landscape Value Outside National Designations and asserts that assessments of landscape value combine with assessments of landscape susceptibility to form an understanding of landscape sensitivity (see my Appendix C, paragraph 2.3.3). However, the submitted LVIA does not include a value assessment for the site and the role it plays within the surrounding landscape context. It is also not clear how elements of value have been considered to draw subsequent conclusions about landscape sensitivity.

4.4.14 In this case, I will revert to the Wynne-Williams Associates descriptor table for assessing value (see Table 1 below)

4.4.15 Considering the elements of value outlined above and using the descriptive scale included within Table 1, I assess the site to hold high/local landscape value. Although the site does not hold any national landscape designations, it forms an important part of the character setting to Brookmans Park.

4.4.16 I do not consider it as a 'valued landscape' for the purpose of NPPF Paragraph 174(a). However, it is important to stress the value that local people place on the site. This is illustrated by the considerable number of objections raised by residents.

Table 1: Landscape Value Criteria	
Landscape value	Definition
Very high / international designation	Landscapes with exceptional scenic quality with strong structure, distinct features and under appropriate and robust management. Very few detracting features. Typically considered attractive by most people and highly valued. Likely to have international designations such as a world heritage site.
High / national	Exceptional scenic quality and containing many attractive features with no visually intrusive elements. Vegetation cover in good condition and well maintained. Considered attractive by most people. Often designated at a national level such as Areas of Outstanding Natural Beauty and National Parks.
Medium/ regional	Attractive landscapes well maintained but with some minor blemishes such as unattractive buildings. Designations as regional, county or district importance such as Areas of Great Landscape Value, Conservation Areas, Local Nature Reserves
High/local	Reasonably attractive landscapes with some attractive features and a few intrusive elements. Variable condition of vegetation and lacking in designations but nevertheless of value to the local area.
Medium/local	Pleasant but ordinary landscapes with intrusive elements including infrastructure and unattractive buildings. Poor vegetation structure and management. Typified by urban fringes.
Low/local	Landscape with severely damaged structure and degraded features. Many unattractive and intrusive features and landscape elements removed such as woodland or hedges. Typical of urban fringe and abandoned industrial sites.

4.5 Landscape Receptors

- 4.5.1 GLVIA3 defines landscape receptors as components of the landscape that are likely to be affected by the proposed development, such as “overall character and key characteristics, individual elements or features, and specific aesthetic or perceptual aspects” (Page 86, paragraph 5.34).
- 4.5.2 Relating to this appeal, I consider the landscape receptors to be:
- The character of the site itself

- The character of the Brookmans Park northern settlement edge
- The character of Peplins Wood as an important feature of the landscape
- The character of LCA54: Potters Bar Parkland (northern parcel only)

4.6 Susceptibility to Change and Character Sensitivity

- 4.6.1 GLVIA3 defines susceptibility to change as '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' (pages 88 and 89 para 5.40).
- 4.6.2 From review of the baseline landscape character assessments and my own fieldwork observations, I consider the susceptibility of identified landscape receptors to the appeal scheme below. Each rating uses the definitions from paragraph 4.3.1 of the Appellant's LVIA methodology (see my Appendix A):
- Site itself – medium/high susceptibility
 - Brookmans Park settlement edge - medium susceptibility
 - Peplins Wood – high susceptibility
 - LCA 54: Potters Bar Parkland (northern parcel only) - medium susceptibility
- 4.6.3 The susceptibility of the appeal site is affected by its proximity to existing residential development at the northern settlement edge of Brookmans Park. This does introduce a degree of suburban character to a small portion of the site. However, the agricultural land use, considerable change in topography, prominent woodland boundary features, and lack of any built development on site give the land a strong rural character. I have also highlighted the role that the site performs in the setting of the village. These finely balanced elements are vulnerable to the introduction of development on the scale proposed by the appeal scheme, which would cause a considerable change in the landscape baseline.
- 4.6.4 GLVIA3 explains that the process for assessing landscape sensitivity requires a combined judgement of susceptibility and value. I assessed the landscape value of the site and

surroundings to be high/local in Section 4.4 of this proof. Below I have combined the value and susceptibility assessments for each receptor to give a sensitivity assessment:

- Site itself – moderate/high sensitivity
- Brookmans Park settlement edge - moderate sensitivity
- Peplins Wood – high sensitivity
- LCA 54: Potters Bar Parkland (northern parcel only) – moderate sensitivity

5 Landscape Effects of the Proposals

5.1 Introduction

5.1.1 In this section, I consider the landscape character effects of the appeal proposals on the site and surrounding area.

5.2 Magnitude of Landscape Effects

5.2.1 I have reviewed the relevant submitted drawings, statements, and strategies that detail the proposed appeal scheme. Outlined below are predicted key changes to the landscape as a resource and also elements of identified landscape character.

5.2.2 The proposals represent a considerable reduction in the agricultural land which forms a rural setting to Brookmans Park, with undeveloped grassland replaced by urban built form. This would equate to the loss of a key landscape characteristic and would be detrimental to the character of the settlement edge.

5.2.3 The submitted Landscape Masterplan for the appeal site indicates no proposed development within 15m of Peplins Wood, this satisfies the Natural England recommendations and direct effects on the ancient woodland are not in dispute as part of this appeal. However, despite the offset, the introduction of built form considerably closer will cause a notable change in the character of the woodland and reduce the contribution it makes to the wider character of the area as an important landscape feature. The proposed fencing to the buffer zone will assist with preventing potentially damaging access to the woodland, but will also introduce an uncharacteristic feature directly adjacent.

5.2.4 Existing trees and hedgerow along site boundaries are set to be retained and strengthened in places. There is also a large area of wildflower meadow proposed for the area set aside for service easements in the north-west corner of the site. These features represent a beneficial landscape effect.

5.2.5 When considering the magnitude of landscape effects, GLVIA3 states that effects should be assessed in terms of size or scale, the geographical extent of the area influenced, and its duration and reversibility (para 5.48, page 90). Each element is considered below.

5.2.6 Size or scale

The appeal scheme proposes that an approximate area of 8ha of undeveloped land would change from agricultural use to residential development. The submitted Landscape Masterplan shows a public open space with fruiting trees along the southern boundary, a wildflower meadow and attenuation basin in the north-west corner of the site, as well as two informal play spaces. The remaining area will undergo significant change in the form of built footprint, hard surfacing, or as residential garden space. This represents a considerable alteration away from the baseline landscape elements of the site.

5.2.7 Geographical extent

Within the site itself landscape effects will be significant, with a considerable alteration from the baseline characteristics. In terms of the immediate surroundings, there will be a notable change in the character of the Brookmans Park settlement edge, with built development encroaching further into rural land. Landscape effects will be restricted to a local level, however, with limited effects on the wider landscape character area (LCA:54 Potters Bar Parkland northern parcel) as a whole.

5.2.8 Duration and reversibility

The predicted landscape effects will be permanent and irreversible. Effects will be amplified during construction due to the increase in activity and the temporary presence of uncharacteristic machinery and stockpiles of materials.

5.3 Significance of Landscape Effects

5.3.1 The table below summarises my landscape effects significance assessments for the appeal scheme across varying temporal scales. Descriptions used to make these assessments were taken from paragraph 4.5.3 of the Appellant’s LVIA methodology (see my Appendix C).

5.3.2 Table 2: Significance of Landscape Effects

		Assessment timeframe		
		During construction	At completion	15 Years following completion
Landscape Receptor	Site itself	Substantial adverse	Substantial adverse	Moderate adverse
	Brookmans Park settlement edge	Substantial adverse	Substantial adverse	Moderate adverse
	Peplins Wood	Substantial adverse	Substantial adverse	Substantial adverse
	LCA 54: Potters Bar Parkland (northern parcel only)	Moderate adverse	Slight adverse	Slight adverse

5.3.3 My colleague David Elmore deals primarily with planning policy. However, when considering these assessments of landscape effects against the relevant planning policy, it is my opinion that the appeal scheme conflicts with both local and national policy. The proposals do not maintain, enhance or improve the character of the existing area and are therefore in conflict with Welwyn Hatfield District Plan Policies D2 and RA10. The scheme also fails to enhance the sense of place for Brookmans Park, placing it in conflict with Welwyn Hatfield Borough Council Draft Local Plan Proposed Submission Policy SP9. Detrimental effects on the landscape setting to Brookmans Park also place the scheme in

conflict with NPPF Paragraph 130 sub-section C. By failing to recognise the intrinsic value of the countryside the scheme conflicts with NPPF Paragraph 174 sub-section B.

6 Visual Effects of the Proposals

6.1 Introduction

6.1.1 In this section, I examine the potential visual effects of the appeal proposals. I visited the site in December 2022 to take my own photographs and carry out my own visual impact assessment in accordance with GLVIA3.

6.2 Receptors and Visual Sensitivity

6.2.1 When considering the sensitivity of visual receptors, GLVIA 3 states:

“It is important to remember at the outset that visual receptors are all people. Each visual receptor, meaning the particular person or group of people likely to be affected at a specific viewpoint, should be assessed in terms of both their susceptibility to change in views and visual amenity and also the value attached to particular views” (Page 113, paragraph 6.31).

6.2.2 It continues to identify visual receptors most sensitive to change as being:

- Residents at home
- People engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focused on the landscape
- Visitors to heritage assets where views of the surroundings are an important contributor to the experience
- Communities where views contribute to the landscape setting enjoyed by residents in the area

6.2.3 The guidance states that “travellers on road, rail or other transport routes tend to fall into an intermediate category”.

6.2.4 GLVIA3 identifies less sensitive receptors to be (para 6.34, page 114):

- People engaged in outdoor sport or recreation which does not involve or depend upon appreciation of views of the landscape
- People at work

6.2.5 For the appeal site, the receptors most sensitive to visual effects are:

- Residents at home along Bradmore Way and Peplins Way
- People using the public footway along Bradmore Way and Peplins Way where views contribute to the landscape setting

6.2.6 Receptors judged to be in the intermediate category for sensitivity are:

- People using Brookmans Park Golf Club. Although these people are engaged in outdoor sport or recreation, golf is a sport that relies upon an appreciation of the landscape. Players must read the terrain in order to spot potential hazards and to plan and execute appropriate shots. This leads to a greater scrutiny of the views available in comparison to sports with uniform playing environments such as football or tennis.
- People in vehicles along Bradmore Way and Peplins Way.

6.2.7 There are no visual receptors identified in the low sensitivity category.

6.2.8 It is agreed within the landscape statement of common ground that there are no visual effects predicted for receptors to the north or west of the appeal site due to screening from existing woodland that forms Peplins Wood and The Legg.

6.2.9 I visited and assessed all viewpoints from the Appellant's LVIA, as well as 4no. additional viewpoints that I identified to be in need of assessment. A location map of my additional photo viewpoints can be found in my Appendix A, with photographs and descriptions of visual effects found in my Appendix B.

6.3 Magnitude and Significance of Visual Effects

6.3.1 Using the descriptors included within the methodology of the Appellant's LVIA, I have assessed the magnitude of change and significance of visual effects on identified receptors

during construction, at completion (winter), and at 15 years post completion (summer). A summary of visual effects on each receptor group is provided below.

6.3.2 Visual effects on residents of Bradmore Way and Peplins Way

For residents with houses backing on to or close to the appeal site, the proposals represent a high level of change from views to undeveloped agricultural land and ancient woodland to a large number of new residential properties and a care home. Visual effects will be more prominent during construction due to the presence of large machinery, construction hoarding, and stockpiles of topsoil and materials. The high level of predicted change combined with high sensitivity of the receptors leads to a substantial adverse visual effect. Although mitigation planting will slightly soften the appearance of the new built development over time, the proximity of receptors to the site will mean that the appeal scheme will continue to be prominent within the view. Planting will not mitigate the loss of longer views to higher topography and Peplins Wood. Therefore, substantial adverse effects are predicted to remain at completion and by Year 15.

6.3.3 Visual effects on residents will be restricted to properties at the northern end of Bradmore Way and Peplins Way. Due to these being private views, it was not possible to get a representative viewpoint photograph. However, viewpoint 1 in my Appendix B provides a good illustration of views for residents backing on to the appeal site.

6.3.4 Visual effects on people using the public footway along Bradmore Way

The proposed site access point at the end of Bradmore Way provides the best publicly accessible viewpoint to appreciate the aesthetic qualities of appeal site (see viewpoint 1 in my Appendix B). It is also one of the very few places within the Brookmans Park village that it is possible to experience views to undeveloped countryside. The appeal scheme would cause a high level of change to this view, causing a major deterioration in visual amenity. New built form would obscure most views to Peplins Wood and further agricultural land on the higher ground to the north. Construction activity will be particularly prominent to these receptors leading to a substantial adverse significance of visual effects. Proposed mitigation planting close to the site entrance will have a slight effect on integrating the new built form into the view, but not enough to reduce the predicted level of visual effect.

Therefore, substantial adverse effects are predicted to remain at completion and by Year 15.

6.3.5 Visual effects to pedestrians along Bradmore Way will be permanent, but will reduce with distance from the site.

6.3.6 Visual effects on people using the public footway along Peplins Way

My viewpoints 2 and 3 represent views for pedestrians along Peplins Way. Visibility to the appeal site is restricted by existing housing, fencing, and back garden trees, but there are various places from which it is possible to see parts of the appeal site. Taller elements of construction machinery will be a visual detractor during construction, particularly on higher ground towards the north-eastern end of the appeal site, causing a high to medium level of change and moderate adverse visual effects. Proposed mitigation planting will screen some views of the new dwellings along the southern boundary, but will also obscure views to parts of Peplins Wood on higher ground. Moderate adverse effects are predicted for pedestrians using the northern sections of Peplins Way at completion and by Year 15. This reduces to negligible adverse further south of my viewpoint 3.

6.3.7 Visual effects on people using Brookmans Park Golf Club

My viewpoint 4 shows the nature of the boundary tree line between the appeal site and Brookmans Park Golf Club. There is a degree of visibility through the tree line for people using the golf course, including views to Peplins Wood. During construction there will be a high level of visual change with activity very close to the shared boundary, equating to a substantial adverse visual effect. This will reduce to a substantial to moderate adverse level by completion and further still to a moderate adverse level following the establishment of proposed mitigation planting.

6.3.8 Visual effects on people in vehicles along Bradmore Way and Peplins Way

Visual change for people in vehicles along Bradmore Way and Peplins Way will be restricted by existing housing, fencing, and back garden trees, as well as the fact that people experiencing the views will be moving at a reasonable speed. Some aspects of construction activity may be seen from vehicles leading to a slight adverse visual effect. This will reduce to a negligible level by completion and Year 15.

7 Effects on the Openness of the Green Belt

7.1 Introduction

7.1.1 In this section, I examine the potential effects on the openness of the Green Belt. My assessment is based on the National Planning Practice Guidance on Green Belt which states “Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- Openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
- The duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
- The degree of activity likely to be generated, such as traffic generation.”

7.1.2 My evidence is organised under each of the three suggested headings below.

7.2 Spatial and Visual Effects on Openness

7.2.1 It is common ground that the proposed development will lead to a loss of openness on the appeal site and that this loss will be both visual and spatial. The illustrative plans for the scheme show how the vast majority of the 8ha site will be used for built footprint, roads, public footways, and back garden spaces. This represents a significant volume of built development within the Green Belt, replacing an area currently devoid of all development.

7.2.2 It is commonly accepted that spatial incursion should also be considered in three dimensions, as opposed to purely assessing building footprint. Proposed buildings will stand predominantly 2 to 2.5 storeys high. This vertical intrusion will further compound the significant reduction of spatial openness of the Green Belt.

7.2.3 As examined in my assessment of visual effects in Section 6 of this proof, the appeal scheme will present a significant visual incursion into open views from public footways along Bradmore Way and Peplins Way, as well as from a considerable number of private

residences along the same roads. This is one of the very few locations that Green Belt openness can be appreciated from the Brookmans Park village. There will also be a loss of intervisibility between the appeal site and adjacent Green Belt land that forms the Brookmans Park Golf Club.

- 7.2.4 The Welwyn Hatfield Green Belt Study Stage 3, carried out by Land Use Consultants (LUC), was commissioned to provide a comprehensive and rigorous assessment of the Green Belt to establish which areas are 'most essential' to retain; and which areas, if developed, could have less harm on the Green Belt. The appeal site is identified within a larger parcel, P66. The relevant extract is included in my Appendix E.
- 7.2.5 When assessing the contribution P66 makes to safeguarding the countryside from encroachment, the Stage 3 Report states, "The land contains the characteristics of the countryside but there are pockets of urban development, including the residential estate and school in the northeast of the parcel, which compromise openness in this part of the parcel. The remainder of the parcel is however open, and its containment by woodland from the wider Green Belt is not considered to diminish its openness or the extent to which it can be considered countryside" (Page 301). The appeal site is located in the far west of the parcel, away from the residential estate and school referred to above. LUC conclude that P66 makes a significant contribution to safeguarding the countryside from encroachment. It is my opinion that the LUC assessment for the wider P66 parcel applies to the appeal site. Development of the land would represent a considerable encroachment into the countryside.
- 7.2.6 When considering potential harm caused by the release of site BrP12, the LUC report concludes "This site contains open grassland and therefore its release would cause encroachment of the countryside within the site. Containment to the north and east by protected woodland, and by the settlement of Brookmans Park to the south, limit the wider Green Belt harm that could result from its release; however this would lead to the greater containment of the golf course area to the south and weaken its contribution to the Green Belt. Overall harm is therefore still 'moderate-high'" (Page 302). It is important to note that Site BrP12 is larger than the appeal site and includes a portion of additional grassland between the appeal site and the narrow limb of Peplins Wood that extends towards The

Legg. Nevertheless, it is my opinion that the conclusion is still valid when considering the smaller appeal site. There would be increased physical and visual containment of Brookmans Park Golf Club, weakening its contribution to the wider Green Belt.

7.3 The Duration and Remediability of Development

7.3.1 The appeal scheme should be regarded as permanent and not remediable. I am not aware of any evidence to suggest the Appellant has made provisions to return land to its original state or to an equivalent (or improved) state of openness.

7.4 The Degree of Activity Likely to be Generated

7.4.1 The appeal site is not currently accessible to the public, with activity limited to agricultural use. There will be a significant increase in activity associated with the proposed development, including the movement of residents, as well as care home staff and visitors. In addition, the new areas of public open space will be visited and used by residents of the village and visitors to the site. This will have a permanent adverse effect on the perceived openness of the appeal site.

7.4.2 There will also be further temporary effects on openness during the construction phase of the development. This will include movement of construction materials, machinery, and staff to and from the site.

7.5 Conclusions on Effects on the Openness of the Green Belt

7.5.1 The proposed development presents a significant spatial and visual intrusion within the Green Belt that cannot be mitigated by measures outlined in the appeal scheme. The development will be permanent and not remediable. It would lead to a significant increase in activity during construction and through its day-to-day use after completion.

7.5.2 I therefore conclude that the appeal scheme would cause significant harm to the openness of the Green Belt and would undermine the contribution that the site makes in safeguarding the countryside from encroachment. This places it in conflict with the Welwyn Hatfield District Plan Policy GBSP1, as well as NPPF Paragraph 138 sub-section C.

8 Conclusion and Summary

- 8.1.1 The appeal is against the refusal of planning permission for "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)". The site is located on Land North of Bradmore Way, The Brookmans Estate, Brookmans Park. The site is currently undeveloped and is in use for agriculture and is located completely within the Green Belt. Planning permission for the scheme was refused for 6 reasons, with this evidence relating to Reasons 1 and 2.
- 8.1.2 I was appointed by Welwyn Hatfield Borough Council in November 2022 to prepare evidence for this Inquiry. I have reviewed the relevant application documents and applicable policy documents, and I have made a site visit to appraise the appeal site and its environs in terms of landscape character and visual impact. My evidence provides my professional opinion on the potential effects of the appeal scheme on the existing landscape character and appearance, as well as the openness of the Green Belt. My methodology adheres to guidance set out in GLVIA3, as well as Landscape Institute TGN 02-21.
- 8.1.3 I have established the planning context for the appeal by identifying the relevant national and local planning policies.
- 8.1.4 My evidence also considers the relevant baseline landscape character documents ranging from a national to a regional scale, as well as character observations made on site. It is my opinion that the area displays many of the characteristics identified within the baseline studies, in particular the local landscape character assessment. I have identified the relevant landscape receptors to the appeal scheme and assess the site itself to hold medium/high susceptibility, the Brookmans Park settlement edge to hold medium susceptibility, Peplins Wood to hold high susceptibility, and the northern parcel of LCA:54 Potters Bar Parkland to hold medium susceptibility to change.
- 8.1.5 Using Landscape Institute TGN 02-21, I have assessed the landscape value of the site and surroundings. Despite not holding any national landscape designations, I judge the site to

hold high/local landscape value. It forms an important part of the character setting to Brookmans Park and an important link to the wider rural surroundings.

- 8.1.6 For each receptor I have assessed the sensitivity to the appeal proposals by combining the identified landscape value and susceptibility. The Brookmans Park settlement edge and LCA 54: Potters Bar northern parcel were assessed to hold moderate sensitivity, the site itself to hold moderate/high sensitivity, and Peplins Wood to hold high sensitivity.
- 8.1.7 I have considered the predicted magnitude and significance of landscape change that would result from the appeal scheme. Within the site itself the landscape effects will be significant with a considerable alteration from the baseline characteristics. In terms of the immediate surroundings, there will be a notable change in the character of the settlement edge to Brookmans Park, with built development encroaching further into rural land. A high level of change is also predicted to the character of Peplins Wood. Effects will be restricted to a local level, however, with limited effects on the wider area or landscape character area (LCA 54) as a whole. The intrusion of built development would be permanent and irreversible.
- 8.1.8 The significance of landscape effects during construction for the site itself, Brookmans Park settlement edge, and Peplins Wood are assessed to be substantial adverse, with effects on the northern parcel of LCA 54 to be moderate adverse. By Year 15, landscape effects are predicted to reduce to moderate adverse for the site itself and the Brookmans Park settlement edge, and slight adverse for LCA 54. Landscape effects on the character of Peplins Wood will not be mitigated and are predicted to remain at substantial adverse by Year 15.
- 8.1.9 When considering visual effects of the appeal scheme, I have identified the most sensitive receptors to be residents at home along Bradmore Way and Peplins Way. Highly sensitive receptors also include people using the public footway along Bradmore Way and Peplins Way where views contribute to the landscape setting. Receptors with a moderate level of visual sensitivity were identified as people using Brookmans Park Golf Club and road users along Bradmore Way and Peplins Way.

- 8.1.10 I assess visual effects to remain at a substantial adverse level for residents along Bradmore Way and Peplins Way by Year 15 as proposed planting will not mitigate the loss of longer views to higher topography and Peplins Wood. The same is true for my assessment of visual effects on pedestrians along Bradmore Way. Moderate adverse effects are predicted for pedestrians along Peplins Way and people using Brookmans Park Golf Club by Year 15, with effects reducing to a negligible level for people in vehicles.
- 8.1.11 When considering the effects on the openness of the Green Belt, I assess the appeal scheme to cause significant harm. It presents a substantial spatial and visual intrusion within the Green Belt that cannot be mitigated by measures outlined in appeal documents. The development will be permanent and not remediable and would lead to a significant increase in activity during construction and through its day-to-day use after completion.
- 8.1.12 It is my opinion that the appeal proposals conflict with NPPF Paragraph 130, sub-section C, as they are not sympathetic to local character and the landscape setting for the site. The scheme also fails to recognise the intrinsic value of the countryside, placing it in conflict with NPPF Paragraph 174(b). In addition, the irreversible harm to the openness of the Green Belt conflicts with NPPF Paragraph 147 and the scheme undermines the ability of the site to assist in safeguarding the countryside from encroachment (NPPF Paragraph 138 sub-section C).
- 8.1.13 In reference to local planning policy, the proposals do not maintain, enhance or improve the character of the existing area and are therefore in conflict with Welwyn Hatfield District Plan Policies D2 and RA10. The scheme also fails to enhance the sense of place for Brookmans Park, placing it in conflict with Welwyn Hatfield Borough Council Draft Local Plan Proposed Submission Policy SP9. The identified harm to Green Belt openness places it in conflict with the Welwyn Hatfield District Plan Policy GBSP1.
- 8.1.14 For the reasons above, I conclude that the appeal scheme would result in permanent and irreversible harm to the character and appearance of the site and surrounding Brookmans Park settlement edge, as well as significant harm to the openness of the Green Belt.

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