

S78 Appeal

# Statement of Common Ground Landscape and Visual Matters

Bricket Wood Sports and Country Club, Paintball Site and Bricket Lodge, Lye Lane, St Albans AL2 3TF

Outline application (access sought) for the demolition of existing buildings, the construction of up to 115 dwellings, the creation of a new access and associated highways improvements.

SADC Ref: 5/2022/2443

PINS Ref: APP/B1930/W/24/3338501

APPELLANT: JK Rudkin Builders Ltd

## 1.0 Introduction and Background

1.1 This Statement of Common Ground (SoCG) in respect of Landscape and Visual Matters has been agreed between Rachel Williams on behalf of JK Rudkin Builders Ltd (the Appellant) and Miranda Knight / Phillip Hughes on behalf of St Albans City and District Council (the Council), and supplements the General SoCG signed between the parties on 14 May 2024.

1.2 To assist the Inquiry, the purpose of this topic-based SoCG is to reduce the differences in dispute between the parties in respect of Landscape and Visual Matters. It sets out those matters which are agreed between the parties and which are not.

1.3 Matters agreed:

a) The Appeal Site and Appeal Proposal;

b) The LVIA;

c) Relevant Guidance Context; and

d) Green Belt.

## MATTERS AGREED

### 2.0 The Appeal Site and Appeal Proposal

2.1 The Appeal Site of c. 3.2 hectares is located on the eastern side of Lye Lane, Bricket Wood, immediately to the north of Blackgreen Wood and the M25.

2.2 The appeal site sits outside any settlement within the countryside and Green Belt between Bricket Wood and How Wood.

2.3 The Site is previously developed land (PDL or brownfield). It comprises three distinct sections:

a) A number of redundant and vacant buildings around an area of hardstanding;

- b) A residential area comprising 31 dwellings and car parking spaces; and
- c) A paintball operation with various structures and hardstanding.

2.4 The Appeal Site is visually well contained and is bordered:

- a) On the north by mature coniferous trees;
- b) On the east and south by Ancient Woodland; and
- c) On the west by Lye Lane enclosed by hedgerows and hedgerow trees, to the west of which lies scrubland.

2.5 As well as being Ancient Woodland, Blackgreen Wood, to the south of the Site (and south, too, of the M25) is also a Local Wildlife Site.

2.6 It is agreed that the Appeal Site itself is not covered by any statutory environmental designations; is not a valued landscape under NPPF Paragraph 180; and is not agricultural land.

2.7 It is agreed that the Appeal Proposal is an Outline Application with scale, layout, landscaping and appearance matters for the future.

### 3.0 **The LVIA**

3.1 It is agreed that the relevant published landscape character context for the Site is National Character Area (NCA) 111: Northern Thames Basin and Landscape Character Area (LCA) 18: Bricket Wood and that the sensitivity of this LCA is medium.

3.2 The methodology adopted for the preparation of the Bricket Lodge Sport and Country Club LVIA (the LVIA), as set out in the LVIA (CD 1.11) Section 1 Paragraphs 1.3 – 1.4 and 1.7 – 1.10 and Section 4 Paragraphs 4.1 – 4.17, is also agreed.

3.3 It is agreed that the Viewpoints that were selected in the LVIA are a fair and accurate representation of the key receptors likely to be affected by the development.

#### 4.0 **Relevant Guidance Context**

4.1 The parties agree the following guidance context:

4.2 The Guidelines for Landscape and Visual Impact Assessment Third Edition published by the Landscape Institute and the IEMA (2013) (GLVIA) (cited in CD 2.9 [p.11] but not included as a Core Document).

#### 5.0 **Green Belt**

5.1 It is agreed that the Appeal Proposal will have a greater impact on the openness of the Green Belt than the existing development.

### **MATTERS NOT AGREED**

#### 6.0 **The Appeal Site and Surroundings**

6.1 The character of Lye Lane.

#### 7.0 **The LVIA**

7.1 The value of sensitivity of the receptor Lye Lane.

7.2 The magnitude of change of both landscape and visual effects on Lye Lane.

#### 8.0 **Green Belt**

8.1 The extent of harm to the openness of the Green Belt.

8.2 The extent of harm to the visual dimension of openness.

A handwritten signature in black ink on a light grey background. The signature appears to be 'R Williams' written in a cursive style.

Rachel Williams  
For the Appellant

A handwritten signature in black ink on a light grey background. The signature is stylized and appears to be 'MH' or similar initials.

Miranda Knight / Phillip Hughes  
For the Council