

## **APPENDIX 14**

### **1. WITNESS BACKGROUND AND PARTICULARS**

#### **Qualifications**

- BA Honours - Geography and Economics
- MLD – Masters in Landscape Design
- CMLI – Chartered Member of the Landscape Institute
- MIEMA - Member of the Institute of Environmental Management and Assessment
- CENV – Chartered Environmentalist

#### **Memberships**

- Member of NIPA (National Infrastructure Planning Association)
- Member of the Institute of Directors
- Corporate Member of the Solar Trade Association
- Member of Energy Network Storage
- Member of Renewable UK

#### **Area of Expertise**

- Expert Landscape Witness
  - Landscape Planning Project Management
  - Landscape Assessment
  - Landscape Character Assessment
  - Visual Assessment
  - Green Belt Assessment
  - Landscape Site Appraisals
  - Landscape Visual Impact Assessment
  - Environmental Impact Assessment
  - Landscape Masterplanning
  - Planning project management
  - Seascape Character Assessment
  - Townscape Character Assessment
  - Detailed Landscape Design
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### **General Profile**

- 1.1 An Executive Director of Pegasus Group, Andrew jointly heads the environmental planning division of the company. Andrew has strong commercial acumen blended with a wide knowledge of the environmental planning environment and as such undertakes a lead project director role on many complex planning projects.
  - 1.2 He is a Chartered Landscape Architect and Environmental Planner. On a daily basis, he has responsibility for overseeing many complex Environmental Impact Assessment (EIA) projects as well as preparing and presenting landscape evidence at Public Inquiries as a landscape expert witness. Andrew has previously sat on the Onshore Strategy Group for Renewable UK to advise on landscape planning strategies. He regularly speaks at conferences on visual and environmental planning issues.
  - 1.3 Andrew is thoroughly familiar with landscape and environmental impact assessment methodologies as they relate to environmental protection legislation as it relates to development. Andrew frequently manages and co-ordinates EIAs for major infrastructure projects. Involved from the outset, Andrew co-ordinates the commissioning of multi-disciplinary teams of consultants and undertakes scoping exercises, liaising with relevant competent authorities. He is involved at all stages of such projects, as well as undertaking landscape and visual assessments and co-ordinating the contributions of other consultants.
  - 1.4 As an experienced expert witness, Andrew is regularly involved in the preparation of cases relating to environmental planning and design issues for Written Representations, Local Plan Inquiries and Section 78 Appeals. Andrew has undertaken numerous landscape and visual assessments, including landscape character assessments and land-use mapping, vegetation surveys, visibility studies and environmental capacity studies.
  - 1.5 Given Andrew's considerable landscape planning experience over 30 years he regularly appears as a speaker at development and property conferences to discuss specific landscape planning issues with regard to particular types of development. He has also undertaken seminars and workshops for a number of legal chambers including Cornerstone, 39 Essex, Landmark, No 5 as well as law firms. More recently, Andrew has run seminars on LVIA aspects to the Planning Inspectorate as part of their annual training event in Bristol.
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- 1.6 Andrew is as a Chartered Landscape Architect an experienced expert witness who has been involved with over 200 appeals to date including written representations, hearings and Public Inquiries. Andrew works with many leading barristers and QCs and is regularly recommended by advocates as a witness on the strength of his reputation. He is fully familiar with environmental legislation and case law as it relates to environmental and landscape issues and has an enviable track record.
  - 1.7 He is involved with all project stages for a wide range of projects. He regularly advises with regard to site finding as well as early site appraisals to advise on prospects concerning planning success. He advises on technical elements relating to landscape and environmental planning to secure optimal design solutions. He has experience in the project management of environmental impact assessments, preparation of environmental statements, LVIAs and environmental enhancement strategies. He advises on and oversees public consultation exercises, as well as liaison with Case Officers through to determination. He provides strategic advice how to manage applications and appeals where environmental planning matters arise, as well as providing advice concerning discharge of Conditions.
  - 1.8 He has considerable experience of leisure related development. This has involved reviewing potential to redevelop golf courses for other leisure uses including holiday accommodation as well as residential development. He has also advised on the design, management and maintenance of golf courses.
  - 1.9 He has been instructed to review land to establish leisure development opportunities. Instructions have also related to existing hotel and spa facilities, advising on how best to operate and manage their associated grounds and estates.
  - 1.10 Given his breadth and depth of renewable energy experience he has historically advised Renewable UK via its steering groups concerning wind energy and prepared planning guidance regarding small wind energy. He has worked on a wide range of wind energy projects from single turbines in rural and urban environments, through to utility scale projects including infrastructure scale projects, Section 36 scale projects in Scotland.
  - 1.11 Andrew has been involved with a wide range of solar projects from inception and site appraisal stage through to non-material amendments and discharge of Conditions. He has overseen a large portfolio of solar farm projects over the last
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decade through the FIT and ROC projects which exceeds 1GW in scale working for many of the major promoters and developers. He is currently advising on several NSIP scale DCO projects from a planning project management perspective. Andrew is currently informally advising the Solar Trade Association.

- 1.12 He has informally advised the Energy Storage Trade Association (ESN) and has been involved in a wide range of projects in terms of location and scale. He has prepared a number of environmental statements and advised from a landscape planning perspective on a number of Energy from Waste (EfW) projects. Additionally, in this role he has been involved in a number of Public Inquiries relating to Energy from Waste (EfW).
- 1.13 He has informally advised and liaised with the Nuclear Decommissioning Authority (NDA) concerning energy development opportunities for decommissioned nuclear installations and advised on new renewable projects with regard to this infrastructure.
- 1.14 Andrew has advised with regard to Public Consultation relating to exploratory projects in north west England shale deposits.

### **Project Experience**

#### **Woodbury Park Golf Club and Hotel**

- 1.15 Andrew was brought into the project to advise on redevelopment of part of the existing golf course to accommodate holiday lodges to expand the visitor experience for the resort. He specifically advised on landscape planning and design aspects.

#### **Cemex House, Egham**

- 1.16 Cemex House is a Listed Building together with its Listed unique roof gardens and grounds. Andrew advised on the redevelopment of the offices to accommodate a retirement village on the site, particularly advising on the landscape planning, LVIA, Green Belt and landscape design.

#### **Thorpe Lakes, Chertsey**

- 1.17 Andrew advised on a water ski facility at the Thorpe Lakes Watersport Resort, Surrey in terms of landscape planning matters in particular concerning effects on the local Green Belt.
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**Falmouth Harbour**

- 1.18 Andrew advised on a proposed redevelopment to accommodate larger cruise ships to berth in the harbour with regard to landscape planning and EIA issues.

**St Helier, Jersey**

- 1.19 Andrew advised the States of Jersey with regard to development on the harbour side. Andrew advised on redevelopment of the harbour to accommodate a seaward landfill site to form a development platform to accommodate an Energy from Waste facility. Andrew advised with regard to landscape planning and EIA.

**Longdene House, Haslemere**

- 1.20 Residential enclave within small country estate. Andrew advised on the implications of the development with regard to local landscape character as it related to the Area of Outstanding Natural Beauty and presented evidence. The Inspector dismissed the second planning appeal on the basis of the evidence.

**Milton-under-Wychwood**

- 1.21 Andrew advised on a residential development located on the edge of the settlement and presented evidence to explain that there would be no material harm in landscape character and amenity terms with regard to the Cotswold AONB. The Inspector agreed with the evidence and allowed the appeal.

**Country Estate east of Leeds**

- 1.22 Andrew has advised on a country estate as to the suitability to accommodate a leisure resort. Having undertaken analysis of the environmental parameters relating to the site, he prepared a promotional document which was issued to a number of resort developers including Center Parcs on behalf of the estate in order to generate expressions of interest.

**Lake Windermere Lake District National Park**

- 1.23 On behalf of the British Water Ski Federation Andrew addressed the proposed water ski facilities with regard to landscape character of the Lake District lakes. The proposal specifically related to Lake Windermere within the National Park and was addressed by a bylaw Public Inquiry.
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**Land at West Worcester**

- 1.24 Andrew was an Expert Witness for a scheme at Great West Worcester development promoted by Bloor Homes Western. The key issue was impact upon the countryside, character and appearance of the countryside being located outside the boundary of the settlement. Inspector agreed with the landscape evidence.

**Holton Heath, Wareham**

- 1.25 Andrew was responsible for preparation of a landscape and visual impact assessment for a proposed road bypass and redevelopment of former ammunition development/manufacturing site to residential uses. Input to Master Plan and landscape strategy preparation for heathland and cSAC, liaison with ecological consultants.

**New Inn, Pontypool**

- 1.26 Andrew was the Landscape Witness for a residential development on behalf of Redrow Homes. The key issue was the site's designation as a Special Landscape Area (SLA). Andrew successfully argued that the development of the site for residential use would not have an unacceptable effect on the function and purpose of the SPA, due to the site's strong landscape design and high level of retention of existing landscape features.

**Commonhead, Swindon**

- 1.27 Andrew was the Landscape Witness for the Commonhead scheme which involved approximately 1,000 houses, a hospital extension and a business park. The key issue was impact upon the setting of the adjacent Area of Outstanding Natural Beauty, which Andrew successfully addressed at the Inquiry, as well as dealing with affect upon character and appearance of the landscape. This appeal was allowed.

**Great Dunmow, Essex**

- 1.28 Andrew was an Expert Witness for a scheme at Great Dunmow residential development promoted by Redrow Homes. The key issue was impact upon the countryside, character and appearance of the countryside being located outside the boundary of the settlement. The Inspector agreed with Andrew's evidence and allowed the appeal.
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### **Various New Garden Communities**

- 1.29 Andrew has advised on several sites across England to advise on accommodating and the integration of new settlements in the countryside providing strategic environmental planning advice on a wide range of environmental parameters to guide the initial development framework, taking into account the site's constraints and opportunities to achieve the best environmental fit such that they are sensitively integrated into the local landscape and surrounding environment.

### **Broden Stables, Crondall**

- 1.30 Andrew advised on a residential scheme located on the eastern side of Broden village. The scheme had been refused planning permission due to impact on the character and appearance of the area. He presented evidenced to explain how the scheme would be effectively integrated into the local landscape and the settlement. Decision allowed. The degree of effect upon visual amenity and landscape character was explained and considered to be acceptable.

### **Ickford**

- 1.31 Andrew presented evidence at an appeal to address alleged impact upon character and appearance of the countryside and the settlement. Andrew explained that the degree of harm would be acceptable, and the scheme was allowed at appeal.

### **Lutterworth**

- 1.32 Proposed residential development which extended Lutterworth westward into a strategic landscape gap. Andrew explained how the functioning of the gap in landscape and visual terms would be retained and the integrity of the designation would remain in place. The Inspector agreed and allowed the scheme at appeal.

### **Takeley**

- 1.33 Andrew advised on a large residential development located in the west side of Takeley which extended into the local Countryside Protection Zone between the settlement and Stansted Airport. Andrew explained how the function and purposes of the designation would not be materially harmed and that physical and visual coalescence would remain materially unchanged with the scheme in place. The Inspector agreed with his findings and allowed the appeal.
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**EDA, Swindon**

- 1.34 Andrew was instructed at the project inception to advise on the eastward extension to advise on a sustainable urban extension located on the east side of Swindon. The development was strategic in scale accommodating up to 15,000 dwellings and business park together with local centre. As environmental project manager he advised on all environmental matters in conjunction with specialist consultants to establish the most appropriate development framework to achieve best environmental fit.

**Pensbury Place, Waste Transfer Station**

- 1.35 Andrew advised on a waste transfer station and its affects upon the character and appearance of an industrial estate within Wandsworth Borough, in response to the Council refusing a retrospective planning application. An appeal is pending.

**Houghton Le Spring, Quarry, County Durham**

- 1.36 Andrew has advised on the effect of redevelopment of a landfill quarry for a business park as previous developed land. Andrew in particular advised on matters relating to visual amenity, landscape character and the local Green Belt. Appeal pending.

**Grayswood Beeches**

- 1.37 A private dwelling proposed as an innovative design of exceptional quality (paragraph 79 house). Andrew has advised on how the dwelling would have a bearing upon visual amenity, landscape character and Green Belt. Appeal decision awaited.

**North Dorchester**

- 1.38 Andrew was instructed to advise a major housing developer as to the most sustainable strategic growth options for Dorchester and over 20 years has advised on this project. The North Dorset expansion is currently being promoted through the Local Plan as a consequence and he continues to advise on this project.

**Northaw**

- 1.39 Major residential development in the Green Belt on previous developed land. Andrew is advising on visual amenity, landscape character, Green Belt, EIA and
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environmental parameters to inform and guide masterplanning of the site. Currently at promotion stage.

**Isle of Wight**

- 1.40 Andrew advised on strategic broadcast / telecommunication masts across the Isle of Wight to address landscape character, general visual amenity. The scheme was consented.

**Winterbourne**

- 1.41 Major residential development in Winterbourne. Andrew is advising on landscape character, visual amenity, Green Belt to inform masterplanning.

**Energy from Waste Facility, Sunderland**

- 1.42 Andrew advised on the landscape planning aspects, in particular affects upon landscape character, general visual amenity and residential visual amenity concerning an Energy from Waste facility in Sunderland, following a refused planning application, in order to present evidence at a Public Inquiry.

**Bolney Glades**

- 1.43 Andrew advised on development of a woodland environment to accommodate a retirement village with regard to landscape character and visual amenity and presented evidence at an appeal.

**Yelvertoft**

- 1.44 Proposed large wind farm in the Midlands. Andrew managed the Environmental Impact Assessment and advised on the LVIA and having been refused, presented evidence on landscape planning matters on character and appearance and was allowed.

**Forest Green Rovers Football Stadium, Stonehouse**

- 1.45 Andrew has advised on the new stadium for Forest Green Rovers at Stonehouse with regard to landscape planning concerning landscape character and visual amenity including effects upon the setting of the Cotswold AONB. Andrew advised on the landscape design and environmental enhancement strategy. The LPA approved the outline application and avoided Section 78 appeal.
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**Blandford St Mary, Dorset**

- 1.46 Andrew was brought in to advise on an RMA that had been refused due to its affect upon two areas of Outstanding Natural Beauty. This scheme would form a sustainable urban extension to Blandford. Having given evidence appeal decision awaited.

**Mynydd Brombil (Wind farm)**

- 1.47 Appeal allowed. Landscape expert witness, LVIA, historic landscape characterisation, visualisations, strategic search area (SSA), residential visual amenity.

**Keypoint, Swindon (Energy from Waste)**

- 1.48 Andrew oversaw the preparation of the environmental statement, LVIA, visualisations, residential visual amenity assessment, appeared as landscape witness to address landscape and townscape and visual amenity issues. Appeal allowed.

**Longney (Solar Farm)**

- 1.49 Andrew project managed application of a solar farm including LVIA, environmental statement, residential visual amenity assessment. Written rep appeal allowed. LVIA updated, environmental enhancement strategy and enlarged parallel application granted planning permission.

**Silton Wind Farm, Dorset**

- 1.50 Andrew was brought into the project to advise upon landscape issues. He prepared a local landscape character assessment and residential amenity study to address landscape and visual reasons for refusal raised by the Council. The Inspector dismissed this appeal on a number of grounds, but the Inspector agreed with Andrew in respect of no failure of the public interest test in respect of nearby residential properties.

**Creag Riabhach Wind Farm, Sutherland**

- 1.51 The Creag Riabhach Wind Farm proposal comprises twenty-two turbines with a 125 metre blade tip height near Altnaharra in the Scottish Highlands. The Section 36 application with a 76.2MW generating capacity was supported by the Highland Council and consented by the Scottish Ministers in October 2016 despite objections from Scottish Natural Heritage (SNH). Pegasus Group were appointed
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to undertake the planning, ES co-ordination, Landscape and Visual Impact Assessment (LVIA), Cumulative Landscape and Visual Impact Assessment (CLVIA), Wild Land Assessment (WLA) and visualisations in accordance with the Highland Council and SNH guidance. The Scottish Ministers concluded that the significant effects on wild land would be outweighed by the community benefits. Scheme consented.

**Mynydd Brombil Wind Farm, Port Talbot**

- 1.52 The Mynydd Brombil Wind Farm proposal comprises four turbines with a 100 metre blade tip height on the Mynydd Margam plateau near Port Talbot, South Wales. Pegasus Group were commissioned to undertake the planning, ES co-ordination, Landscape and Visual Impact Assessment (LVIA), Residential Visual Amenity Study (RVAS) and visualisations. The planning application was refused on landscape and visual grounds including the effects on the LANDMAP character areas and the visual amenity of Margam Country Park. Andrew was appointed to undertake landscape expert witness services for the appeal which was allowed in July 2015. The Inspector agreed that effects of the proposals would not be dissimilar to those within the refined TAN 8 SSAF adjacent to the site and would be mitigated by existing infrastructure. The Inspector concluded that the landscape and visual effects would be justified in terms of the benefits arising from renewable energy generation. Appeal allowed.

**Woodborough Park Farm Wind Turbine, Nottingham**

- 1.53 The Woodborough Park Farm Wind Turbine proposal comprises a single turbine with a 66.79 metre blade tip height located within green belt that was originally approved by Gedling Borough Council in November 2011. However, since the planning application was approved at planning committee and subsequently constructed in December 2013, the wind turbine was subject to a Judicial Review (JR) brought forward by the objector group Woodborough and Calverton Against Turbines (WACAT) quashing the original consent. Pegasus Group were appointed to provide the planning, alternative technology assessment, Landscape and Visual Impact Assessment (LVIA) and visualisations for legal review in response to the JR and resubmission to the Council. The planning application was approved in April 2016. Appeal allowed.
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**Sancton Hill Wind Farm, East Riding of Yorkshire**

- 1.54 The Sancton Wind Farm proposal comprises of five 100 metre to blade tip turbines in the Yorkshire Wolds with a 10MW generating capacity. The proposals had been previously refused due to the lack of supporting information provided by the former consultants. Pegasus Group were therefore commissioned to undertake the planning, ES co-ordination, Landscape and Visual Impact Assessment (LVIA) and visualisations. The proposals were consented by East Riding's planning committee voting 12 to 1 in favour of the development. Consented and avoided appeal.

**Barlborough Wind Turbine, Bolsover**

- 1.55 The Barlborough Turbine proposal comprises of single 86.5 metre to blade tip turbine located within the green belt of Bolsover District. Pegasus Group were commissioned to undertake the planning, Landscape and Visual Impact Assessment (LVIA) and visualisations. The proposals were refused by the Council due to the lack of very special circumstances and effects on the openness of the green belt. Andrew was appointed to undertake landscape expert witness services for the appeal which was granted in June 2013. Appeal allowed.

**Site Appraisals**

- 1.56 Andrew routinely undertakes landscape planning appraisals of potential development sites to advise developers with regard to landscape planning and design matters, as well as broader environmental parameters with regard to Environmental Impact Assessment.
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