

# **Oxted and Limpsfield Residents Group**

**Landscape Proof of Evidence of Louise Hooper,  
BA (Hons), L Arch, CMLI**

Town and Country Planning Act 1990 Appeal by Croudace Homes Limited  
Land South of Barrow Green Road, Oxted

**PINS Appeal Ref No.: APP/M3645/W/25/3372747**

**LPA Ref No.: TA/2025/245**

30 December 2025

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## Summary

- i. The appeal site is an intact, arable field, rural in character, between the urban edge of northwest Oxted and the Surrey Hills National Landscape. It is traversed by a well-used public right of way which connects central Oxted with the North Downs; an unofficial perimeter path is used by local residents. The site is bordered by rare wet Ancient Woodland known as the Bogs, (proposed as a Site of Local Nature Conservation Interest (pSNCI)) with a wooded stream to the south and southwest, the parish church of St Mary's to the southeast and the wooded Oxted Parish Council Burial Ground to the east, the Oxted to London railway to the northeast and a residential area to the south; beyond Barrow Green Road to the northwest lies the undulating landform of the Greensand Valley where it meets the chalk scarp slope of the North Downs.
- ii. Louise Hooper Landscape Architect (LHLA) has prepared a Landscape and Visual Impact Assessment (LVIA) for the proposed development of up to 190 dwellings and a care facility with up to 80 beds on this site, which can be found in Appendix 2 to this proof.
- iii. The site lies in the Greensand Valley which forms part of the setting for the Surrey Hills National Landscape (SHNL). The scarp slope of the Surrey Hills can be seen from the site, and the site can be seen from the Surrey Hills. The proposed development would have a **permanent adverse landscape impact** on the **SHNL and its setting**. It would also **impact adversely on views of and from the SHNL and its setting**. The scale and extent of the proposals are such that the proposed development would not comply with NPPF para 190.
- iv. I consider that the site fulfills the required qualities and characteristics to be defined as a **Valued Landscape**, as summarised in Section 6 of this proof. The proposed development would have a **permanent major adverse impact** on a Valued Landscape. It would not comply with NPPF para 187a.
- v. The conclusions to the LHLA LVIA state that there would be **major adverse** and **permanent landscape effects** on **multiple landscape receptors** and **visual receptors**.

- vi. The LVIA carried out as part of the ES submitted with the planning application for this development under-valued the value and sensitivity of both landscape and visual receptors, leading to an underestimate of the landscape and visual effects of the development.
- vii. I fully support the recommendation of Natural England (NE) in their Surrey Hills National Landscape Boundary Review that the appeal site should be included within the revised Surrey Hills National Landscape boundary.
- viii. This appeal site does not have the capacity for a large development of this scale and form. The landscape and visual impacts of the proposed development include **major** and **permanent adverse impacts to highly sensitive landscape and visual receptors**. The scale and extent of the proposals are such that the proposed development would not comply with NPPF para 187. **The development should not be allowed.**

## 1. Introduction

- 1.1 My name is Louise Hooper and I am a Chartered Landscape Architect and Principal of Louise Hooper Landscape Architect (LHLA). I hold a BA (Honours) in Landscape Architecture from Heriot Watt University, Edinburgh and the Edinburgh College of Art.
- 1.2 I am a Chartered Member of the Landscape Institute, the British organisation for landscape professionals including landscape architects and landscape planners; it was founded in 1929 and was granted a Royal Charter in 1997. I received my Chartered Membership of the Landscape Institute (CMLI) in 1984. My professional membership number is 12077. Louise Hooper Landscape Architect is registered practice number 23442.
- 1.3 I have over 40 years of experience in landscape architecture and landscape planning working in private practice and for local authorities.
- 1.4 I have provided my expert opinion for the purpose of these proceedings and I am aware of the role required by such an expert.
- 1.5 I understand that my duty is to the Planning Inspector, and I have complied with that and will continue to do so. I am aware of the requirements and the Guidance for Instruction of Experts to give Evidence.
- 1.6 I understand that the Civil Procedure Rules (CPR) require me to help the Planning Inspector by providing objective, unbiased opinion on matters which are within my expertise. I understand that this duty overrides any obligation to the organisation from whom I have received my instruction or who will pay my charges.
- 1.7 I am not aware of any potential conflict of interest.
- 1.8 I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those within my own knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

1.9 My report has been prepared following my appointment as an independent expert on landscape matters by the Oxted and Limpsfield Residents Group (OLRG).

1.10 My instruction was received by email on 27<sup>th</sup> October 2025 from the OLRG as a signed Letter of Appointment.

1.11 Prior to this, I was instructed by the OLRG to prepare a Landscape and Visual Impact Assessment for the proposed development. This enabled me to confirm that my evidence would support the reasons for refusal given by the Council. I have subsequently visited the study area on several occasions, visiting viewpoints, walking and driving along relevant roads and footpaths in order to evaluate the site and its setting close to the Surrey Hills National Landscape.

1.12 My proof includes comments on the appeal site and its surroundings, on the landscape assessment, on the visual assessment, on intervisibility between the appeal site and the National Landscape, the Surrey Hills National Landscape boundary variation, the appeal site as a Valued Landscape and my conclusions.

## 2. Context

2.1 This section covers the documents used to assess local landscape character, the methodology and a broad assessment of the appeal site and its surroundings.

### **Landscape character assessments**

2.2 Reference has been made to the following landscape character assessments:

- Surrey Landscape Character Assessment Tandridge District (2015)<sup>1</sup>
- Surrey Hills National Landscape Management Plan 2025-30<sup>2</sup>
- Surrey Hills Landscape Character Assessment (2012)<sup>3</sup>

### **Assessment Methodology**

2.3 Reference has been made to:

- the Guidelines for Landscape and Visual Impact Assessment Third Edition<sup>4</sup> (GLVIA3)
- the Landscape Institute Technical Guidance Note 2024-01 <sup>5</sup>(LITGN 2024-01) Notes and Clarifications on Aspects of GLVIA3
- the Landscape Institute Technical Guidance Note 02/21 <sup>6</sup>(LITGN 02/21) Assessing landscape value outside national designations.

### **Appeal site**

2.4 The appeal site lies at the foot of the wooded chalk scarp of the North Downs which forms the backdrop to the site.

2.5 The site comprises a single arable field with Subgrade 3a Agricultural Land Classification<sup>7</sup> with Ancient Woodland in the southwest corner and woodland in the northeast corner. To the west is a wooded stream with hedgerow and hedgerow trees. To the south is a thick hedge and residential area, to the southeast and east lie a small woodland, St Mary's Parish Church and the

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<sup>1</sup> CD 15.1

<sup>2</sup> CD 4.5

<sup>3</sup> CD 15.4

<sup>4</sup> CD 8.10

<sup>5</sup> CD 8.11

<sup>6</sup> CD 15.8

<sup>7</sup> CD2.7

Oxted Burial Ground. To the northeast is a railway embankment and to the north lies Barrow Green Road with the Greensand Valley and the chalk scarp of the North Downs beyond.

- 2.6 Despite the proximity of central Oxted, these rural surroundings emphasise the perception of the appeal site's rural setting and apparent remoteness from urban development.
- 2.7 The topography of the site is gently undulating between +/-95.5m aod and +/-107m aod. The high point of the site is near the small woodland below the railway embankment to the north of the site with the low point at the southwestern corner. There is a crossfall of +/-11m to the southwest and the Bogs.
- 2.8 A public bridleway (BW 97) crosses the site and is a well-used and popular footpath connecting Oxted and the Surrey Hills.
- 2.9 An unofficial footpath/desire line follows the site perimeter and is well-used by local residents.
- 2.10 The field pattern is of a large regular field with parliamentary enclosure type. The historic settlement type shows Oxted as an ancient scarp foot settlement.
- 2.11 The riparian stream on the western boundary flows into the River Eden; it is a seasonal stream (dry at time of site visit in August 2025) and the site is part of the Upper Eden Catchment. The Eden Catchment provides 85% of the water used by SES Water.
- 2.12 The landscape pattern of the site is intact and its condition is good; it contributes positively to the setting of its surroundings and reflects the landscape quality of the adjacent Surrey Hills.
- 2.13 The Surrey Hills National Landscape (SHNL) lies to the north of the site, with its wooded scarp slope visible from the site. The proposed extension to the SHNL includes the appeal site and is discussed in Section 5 of this proof.

### **Context and surroundings of the appeal site**

- 2.14 The appeal site sits between the urban edge of north Oxted and the rolling open farmland of the Greensand Valley which rises steeply into the North Downs.

2.15 The Surrey Hills National Landscape lies to the north of the site and is an important component of the overall landscape setting and character. There are views from the appeal site to the Surrey Hills to the northwest, and there are views from the Surrey Hills of the site.

2.16 The M25 crosses Chalk Pit Lane on structure between +/-0.8km and 0.9km to the north and northwest of the site. The traffic noise from the site was audible as a quiet hum at the time of my site visits.

### 3. Landscape Assessment

3.1 A landscape assessment uses a baseline of the current character, condition and value of the landscape to predict and describe the effects of an identified change and development on that landscape. The sensitivity and value of the landscape fabric or receptors and the landscape character are described and assessed; the magnitude of change resulting from the proposed development is then described and the significance of the landscape effects is then described and assessed.

#### **Landscape Baseline**

3.2 A baseline study for assessing landscape effects requires desk study and field work to identify local landscape character, key elements including physical influences such as geology, soils, topography and hydrology, landcover including tree cover and vegetation, human activity including land use, field pattern and settlement pattern. Features which give the landscape its local distinctiveness include scale, complexity, tranquillity or remoteness; an understanding is also required of the functions of a healthy landscape in terms of ecosystem services: a working landscape which provides resources such as food, water and timber; regulating factors such as flood control, clean air and water and pollination; cultural benefits such as recreation, spiritual well-being and inspiration and vital supporting services such as soil formation, nutrient cycling, habitat creation which underpin all others.

#### **Landscape Receptors (Fabric)**

3.3 Landscape receptors or landscape fabric comprises the components of the landscape that are likely to be affected by the proposed development. These can include physical landscape features such as trees or streams, landscape character areas, key features or characteristics. They are identified and then described and assessed in terms of their landscape value, their susceptibility to

the specific change which would result from the proposed development and their sensitivity to that change.

3.4 They have been grouped in the LHLA LVIA (Appendix 2 to this Proof) as

- A) Landscape fabric within the site
- B) Landscape fabric forming the site boundaries
- C) Landscape fabric outside the site
- D) Landscape character areas
- E) Landscape qualities

### **Sensitivity of Landscape Receptors**

3.5 The Landscape Institute's *Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition* (LITGN-2024-01)<sup>8</sup> redefines susceptibility in line with the Oxford English Dictionary as:

*'The quality or condition of being susceptible; capability of receiving, being affected by, or undergoing something'*

This definition implies that a higher susceptibility would mean more liable to be harmed by a particular thing and replaces a more ambiguous definition given in GLVIA3<sup>9</sup>.

3.6 Landscape fabric within the site includes Stoney Field, the lone ash tree, the bridleway crossing the site and two areas of woodland, one below the railway embankment and part of the Bogs Ancient Woodland. These have all been assessed to have a high value and a high sensitivity to change apart from Stoney Field, an arable field which has a medium value and sensitivity.

3.7 Landscape fabric forming the site boundaries includes the wooded stream, the hedge along Barrow Green Road and separating Wheeler Avenue from the site, woodland between the church and the site and at the Bogs, the fence and hedge bordering the Burial Ground and the railway embankment. The wooded stream, the woodland between the church and the site and the Bogs have been assessed to have a high sensitivity; the two hedgerows and the fence/hedge bordering

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<sup>8</sup> CD 8.11

<sup>9</sup> CD 8.10

the Burial Ground have been assessed to have a medium sensitivity. The railway embankment has been assessed to have a low value and a low sensitivity to change.

3.7 Landscape fabric outside the site includes the Oxted Burial Ground, the woodland between the church and the site, Bridleway 97 within woodland, the gardens of Wheeler Avenue, the Bogs, farmland, scrub/woodland and the garden of Brookmead. These have generally been assessed to have a high landscape value and a high sensitivity to change apart from the farmland and scrub/woodland (to the north of the site) which were both assessed to have a medium value and medium sensitivity to change.

3.8 Landscape character areas include the Merstham to Clacket Lane Greensand Valley, the Box Hill to Tatsfield Chalk Ridge and the North Downs Scarp to Holmesdale, part of the Surrey Hills National Landscape (SHNL); the Chalk Ridge and the SHNL were both assessed to have a high landscape value and high sensitivity to change; the Greensand Valley was assessed to have a high/medium value and a high/medium sensitivity to change.

3.9 Landscape value and qualities include landscape condition, scenic quality, openness, extensive views, tranquillity and perceptual aspects, recreation, nature conservation and cultural heritage; most of these were assessed to have a high landscape value and a high sensitivity to change, with scenic quality having a high/medium value and sensitivity and landscape condition having a medium value and sensitivity.

### **Magnitude of landscape effects on Landscape Receptors**

3.10 The magnitude of change is the scale, extent and duration of change to a landscape arising from the proposed development.

3.11 For landscape fabric within the site, the magnitude of change would be high for Stoney Field itself, the Bogs Ancient Woodland and bridleway 97 crossing the site; for the lone ash tree the magnitude of change would be moderate and for the woodland below the railway the magnitude of change would be low.

3.12 For landscape fabric forming the site boundaries, there would be a high magnitude of change to the Bogs and to the hedgerow forming the south boundary, a moderate/high magnitude of change to the woodland between the church and the site, a moderate magnitude of change to

the hedge bordering Barrow Green Road and a low magnitude of change to the wooded stream and the Burial Ground boundary. There would be no change to the railway embankment.

3.13 For landscape fabric outside the site, there would be a high magnitude of change for the Bogs, with a medium magnitude of change for the Oxted Burial Ground, for the bridleway through the woodland and for the woodland itself; for the gardens of Wheeler Avenue and Brookmead, the magnitude of change would be low with no change to adjacent farmland or scrub/woodland.

3.14 For landscape character areas, there would be a moderate magnitude of change to the Box Hill to Tatsfield Chalk Ridge and to the North Downs Scarp to Holmesdale section of the SHNL, with a low/medium magnitude of change to the Merstham to Clacket Lane Greensand Valley.

3.15 For landscape qualities, there would be a high magnitude of change to landscape condition, scenic quality, openness, views, tranquillity and biodiversity, with a moderate/high magnitude of change to recreation and a moderate magnitude of change to cultural heritage.

### **Assessment of Landscape Effects**

3.16 The assessment considers and describes the main landscape effects resulting from the proposed development. The narrative text demonstrates the reasoning behind the judgements concerning the landscape effects of the proposals and the methodology in the appendix describes the process. The text is supported by Tables 4A and 4B in the LHLA LVIA which summarise the sensitivity of the landscape, the magnitude of change and the resulting landscape effects.

3.17 For the landscape fabric within the site, the landscape effects would be **major adverse** for Stoney Field itself, the lone ash tree, bridleway 97 and the Bogs. For the woodland below the railway the landscape effects would be **moderate adverse**.

3.18 For the landscape fabric forming the site boundaries, the landscape effects would be **major adverse** for the hedgerow on the southern boundary, the woodland between the church and the site and the Bogs Ancient Woodland; for the wooded stream and the hedge bordering Barrow Green Road the landscape effects would be **moderate adverse**; for the fence and

hedge bordering the Burial Ground and for the railway embankment the landscape effects would be minor adverse and negligible respectively.

3.19 For landscape fabric outside the site the landscape effects would be **major adverse** for the Bogs Ancient Woodland. For the Burial Ground, the woodland between the church and the site, for bridleway 97 within the woodland and for gardens of Wheeler Avenue and Brookmead the landscape effects would be **moderate adverse**; for the nearby farmland and scrub/woodland the landscape effects would be negligible.

3.20 For landscape character areas, the landscape effects would be **major adverse** on the Box Hill to Tatsfield Chalk Scarp and on the North Downs Scarp to Holmesdale (within the SHNL); for the Merstham to Clacket Lane Greensand Valley the landscape effects would be **moderate adverse**.

3.21 For all landscape qualities, the landscape effects would be **major adverse**.

### **Mitigation and Residual Effects**

3.22 Mitigation measures are described as those measures, including any process or activity, designed to avoid, reduce and compensate for adverse landscape effects resulting from the proposed development.

3.23 In situations where proposed mitigation measures are likely to change over time, as with planting to screen a development, it is important to make a distinction between any likely effects that will arise in the short term and those that will occur in the long-term or 'residual effects' once mitigation measures have established.

3.24 These 'residual effects' are described as 'landscape effects after 15 years' in the LHLA LVIAs. They could change for the landscape character areas of the Box Hill to Tatsfield Chalk Ridge and the North Downs Scarp to Holmesdale where the landscape effects after 15 years could reduce from moderate adverse to minor adverse as a result of the growth of the proposed structure planting. They could also change for the E6 Recreation where additional recreational value could be provided after 15 years giving rise to a moderate adverse long-term effect.

## 4. Visual Assessment

4.1 This section considers the likely visual effects of the proposed development. Visual effects are concerned with people's views of the landscape and the changes that would occur to that view.

### **Visual baseline**

4.2 The baseline for a visual assessment identifies the area from which the development may be visible and the different groups of people who may have views of the development from public roads and public rights of way (PRoWs).

### **Visual receptors and sensitivity to change**

4.3 Visual receptors (VRs) in the LHLA LVIA (Appendix 2 to this Proof) have been taken as the 10 representative viewpoints (VPs). All of these views (VP1 to VP7 and VP9 to VP10) are taken from public roads, public open space or PRoWs apart from VP8 taken from the Oxted to London train; they represent the views seen by road or open space users, walkers or cyclists using the footpaths or National Trails. Most of these visual receptors are likely to be moving relatively slowly and to be in that location to enjoy the surroundings; the sensitivity of many of the visual receptors is assessed to be high as people who are engaged in outdoor recreation whose attention is on the view.

4.4 Three of the viewpoints, VP2, VP6 and VP7 have been taken from public roads close to the site; VP2 is taken from a cul de sac in a residential road. They represent the views of local residents and drivers using the local roads where the sensitivity of the visual receptors is assessed to be high for VP2 and medium for VP6 and VP7. VP8 is taken from a passenger train and the sensitivity of the VRs on the train is assessed to be medium/low.

4.5 Viewpoints VP1, VP3, VP5, and VP9 to VP10 are taken from public rights of way; These views would be seen mainly by walkers, some horse riders, cyclists and runners and as VRs, they are considered to have a high sensitivity. VP4 is taken from the Oxted Burial Ground, a public open space where the sensitivity of the VRs is assessed to be high.

### **Magnitude of change**

4.6 There would be a high magnitude of change for VRs at VP1, VP2, VP3, VP4, VP5 and VP6; there would be a medium magnitude of change for VRs at VP7, with a low magnitude of change for VRs at VP8, VP9 and VP10.

### **Visual effects**

4.7 The visual effects of the proposed development would be **major adverse** for VRs from VP1, VP2, VP3, VP4, VP5 and VP6; the visual effects of the proposed development for VRs from VP7, VP9 and VP10 would be moderate adverse; the visual effects for VRs from VP 8 would be minor adverse.

### **Mitigation and Residual Effects**

4.8 Mitigation measures are described as those measures, including any process or activity, designed to avoid, reduce and compensate for adverse visual effects resulting from the proposed development.

4.9 In situations where proposed mitigation measures are likely to change over time, as with planting to screen a development, it is important to make a distinction between any likely effects that will arise in the short term and those that will occur in the long-term or 'residual effects' once mitigation measures have established.

4.10 These 'residual effects' are described as 'visual effects after 15 years' in the LHLA LVI. They could change for Viewpoint 4 if screen planting of trees matured along the Burial Ground boundary, resulting in a reduction of visual effects after 15 years from 'major' to 'moderate'. For VP9 and VP10 the visual effects after 15 years could reduce from moderate adverse to minor adverse as a result of the growth of the proposed structure planting.

## 5. Surrey Hills National Landscape

### **The importance of the National Landscape and its setting**

- 5.1 Paragraph 189 of the NPPF<sup>10</sup> states that: *'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads.'*
- 5.2 The NPPF continues to state that development within the setting of a National Landscape should be sensitively located and designed to avoid or minimise impacts. Para 189 states that: *'The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.'*
- 5.3 The Surrey Hills National Landscape Management Plan 2025-2030<sup>11</sup> includes Policy P13 which states: *'The impact of development outside the boundary of the Surrey Hills National Landscape that would adversely impact its setting by harming public views to or from it.... should be considered.'*
- 5.4 The site lies in the Greensand Valley which forms part of the setting for the Surrey Hills National Landscape (SHNL). The site can be seen from National Trails within the SHNL such as Vanguard Way (VP9 in LVIA) and from viewpoints within the North Downs Scarp to Holmesdale Character Area of the SHNL such as Gangers Hill (VP10 in LVIA). The proposed development would impact adversely on these views.
- 5.5 The SHNL makes an important contribution to the site setting by bringing the wooded foothills of the chalk scarp right down to the site. This sweeping landscape backdrop gives the site a strong sense of identity and local distinctiveness.

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<sup>10</sup> CD 5.1

<sup>11</sup> CD 4.5

5.6 There are long views from the site to the north and northwest into the SHNL which influence the site character and emphasise its rural setting.

### **Intervisibility**

5.7 There is intervisibility with the SHNL to the north and northwest of the site.

5.8 The visual baseline fieldwork for the LVIA was carried out in June and July 2025.

Subsequent visits were made in November and December 2025 when there was less vegetation on the trees and hedgerows and visibility was improved.

5.9 Using inter-visibility from within the site and a pair of binoculars, cross referenced with the OS Explorer map, we targeted potential viewpoints and visited each, seeking out potential views along key roads, public footpaths and byways.

5.10 There are occasional glimpsed views of the site from the Vanguard Way/Oxted Downs.

### **Levelling Up and Regeneration Act 2023**

5.11 Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 (LURA) places a duty on the relevant authorities in exercising or performing any functions in relation to land in Areas of Outstanding Natural Beauty or National Landscapes in England to seek to further the statutory purposes of the area.

5.12 In December 2024 Defra released Guidance<sup>12</sup> for relevant authorities on seeking to further the purposes of Protected Landscapes. This duty applies to local planning authorities making planning decisions as well as other public bodies.

5.13 The duty to 'seek further' is an active duty, not a passive one

5.14 The new duty underlines the importance of avoiding harm to the statutory purposes of a Protected Landscape and also to seek to further its conservation and enhancement.

5.15 The duty also applies to functions outside the designation boundary which affect land within the Protected Landscape. Aspects such as tranquillity, dark skies or long views from

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<sup>12</sup> CD 8.9

and into the Protected Landscape may draw upon the landscape character and quality of the setting

### **Surrey Hills National Landscape Boundary Review**

5.16 Natural England (NE) published their Final Report<sup>13</sup> in June 2025 on the SHNL Variation Project with a full report of the 2023 and 2024 consultations. The appeal site is one of many sites included in the consultation and review process, and is identified in the study as A13, Stoney Field and The Bogs, see Figure 1 in Appendix 1 to this proof.

5.17 A description of Stoney Field is given in the Statutory Consultation Analysis Appendix 16: Godstone Hills<sup>14</sup>.

5.18 The natural heritage feature of the Bogs is described as: '*a feature of interest ...comprising ancient and deciduous woodland to be included*

5.19 The Natural Beauty Assessment Report<sup>15</sup> undertaken by NE in 2023 notes that the parts of Candidate Area EA 10 which are considered suitable for inclusion (within the ongoing SHNL boundary review) are:

*'The upper part of the greensand vale, to the northwest of Oxted, where the undulating topography and extensive semi-natural ancient woodlands form a relatively enclosed and distinctive landscape which is contiguous with the existing AONB chalkland landscape to the north'*

5.20 The Statutory Consultation Analysis Appendix 16: Godstone Hills<sup>16</sup> sets out the reasons why Stoney Field and The Bogs (A13) qualify for inclusion within the proposed extension to the SHNL. These reasons include:

*'...the open arable field in between Barrow Lane and the settlement edge forms part of a sweep of agricultural landscape to the north and affords dramatic views of the chalk scarp.'*

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<sup>13</sup> CD 8.6

<sup>14</sup> CD 8.4

<sup>15</sup> CD 8.12

<sup>16</sup> CD 8.4

5.21 An extension to an existing National Landscape is formally designated once a Variation Order, made by Natural England, is confirmed by Defra Secretary of State. Following the issue of the Designation Order by Natural England, but prior to confirmation by the Secretary of State, any area that is subject to a Variation Order would carry great weight as a material consideration in planning decisions.

5.22 I fully support the Final Report of the Surrey Hills Consultation Analysis<sup>17</sup>(June 2025) and consider that the appeal site embraces the characteristics and qualities of the SHNL and should be designated.

### **Compliance with NPPF paragraph 189**

5.23 The impact of the proposed development on the SHNL and its setting is described in detail in paras 5.4 to 5.6 of this proof. It is useful however to repeat that the proposed development would have a **permanent major adverse effect** on the Surrey Hills National Landscape and on its setting. The scale and extent of the proposals are such that the proposed development **would not comply with NPPF para 189.**<sup>18</sup>

## **6. Appeal site as a Valued Landscape**

6.1 Landscape and visual assessment are the key processes which inform a judgement on how valued a landscape is. An understanding of the inherent character of a site and the contribution it makes to the surrounding landscape character is part of the landscape assessment process which can appraise landscape sensitivity and landscape value.

6.2 Establishing the value of the landscape extends beyond designation. The relative value of a landscape will differ to different stakeholders: for example, a farmer may be concerned over the value of the soil, and the yields of his crops, a dog-walker may be concerned over the quality and quantity of local footpaths, a local resident may be concerned about outlook and tranquillity, and a visitor may be concerned over views, signage, car parks and access.

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<sup>17</sup> CD 8.6

<sup>18</sup> CD 5.1

6.3 A living, working landscape can comprise agricultural, recreational, residential, working and transport activities. There are many layers of geology, hydrology, history and biodiversity required to create the complex landscapes we see today.

6.4 Landscape Institute Technical Guidance Note (LITGN) 02/21<sup>19</sup> '*Assessing landscape value outside national designations*' provides the most recent information and guidance on the judgement of landscape value, and the interpretation of the term 'valued landscape' as used in the (England) National Planning Policy Framework<sup>20</sup> (NPPF).

6.5 LITGN 02/21<sup>21</sup> is intended to supplement and complement existing guidance on landscape value found in the Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3) (Box 5.1)<sup>22</sup>.

6.6 A Valued Landscape is an area defined in LITGN 02/21<sup>23</sup> as '*having sufficient landscape qualities to elevate it above other more everyday landscapes.*'

6.7 Table 1 sets out factors, indicators and evidence for an appraisal of the appeal site as a Valued Landscape. The site contains a number of key features which provide strong evidence for its definition as a Valued Landscape:

- Natural heritage
- Cultural heritage
- Landscape condition
- Distinctiveness
- Recreational opportunities
- Landscape quality and views
- Tranquillity and remoteness
- Function

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<sup>19</sup> CD 15.8

<sup>20</sup> CD 5.1

<sup>21</sup> CD 15.8

<sup>22</sup> CD 8.10

<sup>23</sup> CD 15.8

6.8 Each of these assets has its own role in contributing to a Valued Landscape, so a ranking of priority or a scoring system would be unhelpful.

6.9 The appeal site meets all the criteria of a Valued Landscape; I consider that the appeal site should be defined as a Valued Landscape.

6.10 By proposing the appeal site as part of an extended SHNL, Natural England considers the site to meet the criterion for designation as a National Landscape. In his consultation response<sup>24</sup> for the planning application for the site dated 14 August 2025 to Tandridge District Council, Piotr Behnke of the NE Thames Solent Team writes that: '*Natural England considers the Surrey Hills to be a valued landscape in line with paragraph 187 of the National Planning Policy Framework (NPPF)*'

6.11 Paragraph 187 of the NPPF<sup>25</sup> states that:

*'Planning policies and decisions should contribute to and enhance the natural and local environment by:*

*a) protecting and enhancing valued landscapes....*

6.12 I fully support NE's view that the site and surroundings should be designated as a National Landscape.

6.13 I have undertaken a review of the site as a Valued Landscape (see Table 1). I have used the Landscape Institute Technical Guidance Note (LITGN) 02/21 'Assessing landscape value outside national designations'<sup>26</sup> which provides the most recent information and guidance on the judgement of landscape value and the interpretation of the term 'valued landscape' as used in the National Planning Policy Framework (NPPF).

6.14 LITGN 02/21<sup>27</sup> was intended to supplement and complement existing guidance on landscape value found in the Guidelines for Landscape and Visual Impact Third Edition (GLVIA3)<sup>28</sup>.

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<sup>24</sup> CD 8.8

<sup>25</sup> CD 5.1

<sup>26</sup> CD 15.8

<sup>27</sup> CD 15.8

<sup>28</sup> CD 8.10

Factor	Definition	Indicators of landscape value	Evidence of landscape value
<i>Natural heritage</i>	Landscape with clear evidence of ecological or other interest which contributes positively to the landscape	A landscape which contains valued natural capital assets which contribute to ecosystem services & a sense of place	Important area of rare wet woodland in the south-west corner of the site, contiguous with an extensive area to the southwest known as The Bogs, a designated ancient woodland, sustained by the flow of run-off water from the adjacent greensand ridge. It is also a proposed Site of Nature Conservation Interest. (pSNCI) Riparian water course on western boundary.  Historic native hedgerow and hedgerow trees
<i>Cultural heritage</i>	Landscape with clear evidence of historical interest which contributes positively to the landscape	Field pattern  Listed buildings	Semi-regular fields with straight boundaries (parliamentary enclosure type). PRoW and historic routeways of Barrow Green Road and Chalk Pit Lane shown on 1869-71 OS map; site lies at the junction of these two roads which was the main approach to Oxted from the north  The church of St Mary the Virgin is 12 <sup>th</sup> century, Grade I listed and a local landmark visible from the PRoW crossing the site, especially in winter.
<i>Landscape condition</i>	Landscape which is in a good physical state (individual elements and overall landscape structure)	Condition of field and boundaries	Intact historic field pattern, traditional arable farmland, strong boundaries of woodland and native hedgerow to north, south and west, well maintained Oxted Burial Ground boundary to east, no visible litter or dog poo on well-trafficked PRoW.
<i>Distinctive-ness</i>	Landscape that has a strong sense of identity	Makes a positive contribution to the local area	Makes an important contribution to the character of Oxted by bringing the foothills of the chalk scarp right down to the back gardens of west Oxted and provides a rare wide sweeping view towards the Surrey Hills.
<i>Recreational &amp; amenity</i>	Landscape offering recreational opportunities	Public Right of Way (PRoW) leading to National Trail/Long Distance Trails	BW 97 (UK011/97/10) crosses the site diagonally and leads from the church and town centre up onto the chalk scarp of the SHNL with its ancient trails and trackways such as the Pilgrims' Way and the North Downs Way. It is an important route for locals and visitors into the countryside and the Surrey Hills and is regularly used by local residents as part of a circular route which includes the site perimeter.
<i>Landscape quality &amp; views</i>	Landscape that appeals to the visual senses	Distinctive features and landform	Key 'gateway' panoramic view of the SHNL on leaving the churchyard and Oxted. Part of a gently undulating wooded landscape with views sweeping seamlessly up to the wooded chalk scarp of the SHNL. An integral part of the setting of the SHNL. Has been proposed by NE as part of the AONB boundary extension.
<i>Perception (remoteness &amp; tranquillity)</i>	Landscape with a strong perceptual value such as distance from urban areas, tranquillity and dark skies	Peace and quiet, lack of urban features and remoteness	Despite its proximity to the urban Oxted, the site feels far removed from urban area, offering rural farmland and woodland, birdsong can be heard. Southern boundaries shared with residential area but provides a vital transition zone from urban area into the countryside. Some periodic noise from passing trains, occasional hum from M25, dark skies.
<i>Function</i>	Landscape with a clearly identifiable function	Elements contributing to the healthy functioning of the landscape	Part of the Upper Eden Catchment, healthy soils provide a carbon sink, food production, flood regulation, recreation including walking, equestrian, cycling and nature observation, ancient woodland provides rich biodiversity supporting a variety of species.

Table 1      Assessment of the site as a Valued Landscape

## 7 Areas of Disagreement with Appellant's LVIA

### **Landscape and Visual Receptors**

7.1 I consider the list of Landscape Receptors as set out in para 12.4.47 of the ES to be incomplete, and at times under-valued in terms of value and sensitivity.

7.2 I consider the Visual Receptors are at times under-valued in terms of sensitivity, such as RD01 and RD02. Receptor RD01, relates to the users of Barrow Green Road and Chalkpit Lane, a 'low susceptibility' is given on the assumption that users are '*travelling by road and their attention is unlikely to be focussed on the landscape*'. These users however will include car passengers, pedestrians, hill walkers and cyclists, some travelling at low speed and likely to appreciate the landscape. In my opinion the VR sensitivity should be 'medium' not 'low'. RD02 relates to the users of Wheeler Avenue who are described as travelling by road with a medium value and low sensitivity. The users of Wheeler Avenue will include local residents, pedestrians, walkers and cyclists travelling at low speeds and likely to focus on the landscape and views of the SHNL. In my opinion VR sensitivity should be 'medium' and not 'low'.

### **Landscape Impact**

7.3 Figure 12.15 of the Appellant's ES (Section H3 of Volume 2) shows the magnitude of impact on trees and vegetation to be negligible, the nature of change to be neutral and the significance of landscape effects to be minor. Appendix 2 to this proof, the LHLA LVIA shows the landscape effects on the lone ash tree, the Bogs Ancient Woodland, the woodland between the church and the site and on the hedgerow on the south boundary of the site to be **major adverse**; the landscape effects on other trees and vegetation in and around the site would be **moderate adverse**.

7.4 Figure 12.15 of the Appellant's ES (Section H3 of Volume 2) shows the magnitude of impact on the Surrey Hills NL to be negligible, the nature of change to be n/a, and the significance of landscape effects to be negligible. Appendix 2 to this proof, the LHLA LVIA shows the landscape effects on the SHNL to be **major adverse**.

7.5 The Appellant's ES does not address landscape effects on Bridleway 97. Appendix 2 to this proof, the LHLA LVIA shows the landscape effects on the bridleway within the site to be **major**

**adverse**, and the effects on the bridleway within the woodland next to the church to be **moderately adverse**.

### **Visual Impact**

7.6 Figures 2 to 7 in Appendix 1 to this proof show extracts from the Appellant's ES (Section H3 of Volume 2). They show the existing and proposed views from three key locations: from Bridleway 97 crossing the site, from the Oxted Parish Council Burial Ground and from Wheeler Avenue (VP1, VP7 and VP14 respectively of the Appellant's ES).

7.7 The impact on users of the bridleway would be **major adverse**

7.8 The impact on users of the Burial Ground would be **major adverse**.

7.9 The impact on both the residents and users of Wheeler Avenue would be **major adverse** rather than minor/moderate adverse as described in Table 12.16 of Volume 2\_12 of the Appellant's ES.

### **Future Baseline**

7.10 Para 12.4.105 of the ES states: '*Were NE to confirm that the AONB boundary should be extended to include proposed addition A13, the Site and the area of LCA GV5 currently outwith the AONB would become part of the designated landscape. In this scenario, the landscape value of both the site and LCA GV5 would be assessed as high, reflecting their status as 'valued' landscapes. Their susceptibility to the type of change proposed and therefore their sensitivity would be assessed as high.*'

7.11 NE included A13 as part of Step 9 of its recommended boundary variation for the Surrey Hills National Landscape in June 2025<sup>29</sup>, as shown in Figure 1 of Appendix 1 to this proof.

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<sup>29</sup> CD 8.6

7.12 Following a formal period of notice, NE will submit an Order to the Secretary of State (Defra). Following the Secretary of State's decision, an Order may be confirmed with or without amendment. Formal landscape designation will come into effect when this Order is confirmed.

7.13 As a result of the NE recommendation, both the site and site context (LCA GV4) should be assessed as 'high'.

## 8. Conclusions

8.1 The appeal site is an arable field known as Stoney Field, rural in character, traversed by a well-used public right of way and is surrounded by woodland, thick hedges and a burial ground; it sits below the chalk scarp which rises up steeply into the North Downs.

8.2 The site lies in the Greensand Valley which forms part of the setting for the Surrey Hills National Landscape (SHNL). The scarp slope of the Surrey Hills can be seen from the site, and the site can be seen from the Surrey Hills. The proposed development would **impact adversely on views of and from the SHNL and its setting.**

8.3 I have assessed the site and consider that it is fully compliant with the required qualities and characteristics to be defined as a **Valued Landscape**, as summarised in Section 6 of this proof. I have referred to the factors identified in Table 1 of the Landscape Institute Technical Guidance Note (LITGN) 02/21<sup>30</sup> Assessing Landscape Value Outside National Designations (which supersedes Box 5.1 of the GLVIA3<sup>31</sup>), see Table 1. The site meets all the criteria of a Valued Landscape; I consider that the appeal site should be defined as a Valued Landscape.

8.4 The proposed development would have a **permanent major adverse impact** on a Valued Landscape. It would not comply with NPPF para 187.

8.4 LHLA has prepared a LVIA for the proposed development of up to 190 dwellings and a care facility with up to 80 beds on this site, which can be found in Appendix 2 to this proof.

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<sup>30</sup> CD 15.8

<sup>31</sup> CD 8.10

8.5 The conclusions to this LVIA state that there would be **major adverse** and **permanent landscape effects** on **multiple landscape receptors** including within most of the site itself, on some of the site boundaries, the site setting and its landscape qualities. There would be **moderately** and **permanent adverse impacts** on a small part of the site, on much of the site boundary, on landscape fabric outside the site and on the site setting.

8.6 The LVIA conclusions state that there would be **major** and **permanent adverse visual effects** on visual receptors with views of the proposed development within and around the site, with **moderate** and **permanent adverse effects** on visual receptors close to the site and within the SHNL.

8.7 The LVIA undertaken as part of the ES submitted with the planning application has under-assessed the value and sensitivity of some of the landscape receptors, namely the site itself and part of its setting, the Greensand Valley Landscape Character Area GV4. The ES has assessed these two Landscape Receptors as being of medium value and sensitivity (para 12.4.51 and 12.4.53, value and para 12.4.57 and para 12.4.59, sensitivity). In Section 6 of this proof, I assessed the site for its eligibility as a Valued Landscape and found that it was fully compliant with the required qualities. Therefore, I consider that it should be assessed to have a **high value**. Since both the site and part of its setting have been recommended for inclusion in the extended SHNL as A13, NE's assessment considers these areas to have a sufficiently **high landscape value** to be designated as a National Landscape. They should therefore both be assessed to have a **high landscape value and high sensitivity to change**.

8.8 For the visual receptors, the ES has assumed (para 12.4.91 and 12.4.94) that people '*travelling by road*' (RD01 and RD02) would be '*unlikely to be focussed on the landscape*', so their sensitivity was assessed to be medium. Users of these roads include cyclists, pedestrians and vehicle passengers whose attention may indeed be focussed on the landscape and the view; the sensitivity of this group of visual receptors should be assessed as **medium to high**.

8.9 The appeal site should be included within the Surrey Hills NL as part of the NE recommendations in the SHNL boundary review.

8.10 The appeal site does not have the capacity for a large development of this scale and form. The landscape and visual impacts of the proposed development include **major** and **permanent adverse impacts to highly sensitive landscape** and **visual receptors**. The scale and extent of the proposals are such that the proposed development would not comply with NPPF para 182. **The development should not be allowed.**

## 9. Expert Declaration

### **Professional Details**

9.1 I am the Principal of Louise Hooper Landscape Architect (LHLA)

9.2 I hold a BA (Honours) in Landscape Architecture from Heriot Watt University, Edinburgh and Edinburgh College of Art.

9.3 I am a Chartered Member of the Landscape Institute, the British organisation for landscape professionals including landscape architects and landscape planners; it was founded in 1929 and was granted a Royal Charter in 1997. I received my Chartered Membership of the Landscape Institute (CMLI) in 1984. My professional membership registration number is 12077 and LHLA is registered practice number 23442.

9.4 I have been in professional practice for 41 years.

### **Professional Appointment**

9.5 LHLA was appointed by the Oxted and Lingfield Residents' Group to prepare a Landscape and Visual Impact Assessment for Stoney Field, Oxted in April 2025. In October 2025 I was appointed to prepare a Proof of Evidence on Landscape Matters associated with Planning Appeal ref APP/M3645/W/25/3372747 for the refusal of an outline planning application for up to 190 dwellings and a care facility with up to 80 beds by Tandridge Borough Council on land south of Barrow Road, Oxted, ref TA/2025/245.

### **Scope of Expert Report**

9.6 I have provided my professional opinion for the purpose of this inquiry, and I am aware of the role required by an expert in these proceedings.

9.7 My report has been prepared following my appointment as an independent expert by Oxted and Limpsfield Residents Group (OLRG).

9.8 My instruction was received by email from the OLRG on 27<sup>th</sup> October 2025 as a signed Letter of Appointment.

### **Declaration and Statement of Truth**

9.9 I understand that my duty is to the Planning Inspector, and I have complied with that and will continue to do so. I am aware of the requirements and the Guidance for Instruction of Experts to give Evidence.

9.10 I understand that the Civil Procedure Rules (CPR) require me to help the Planning Inspector by providing objective, unbiased opinion on matters which are within my expertise. I understand that this duty overrides any obligation to the person or group from whom I have received my instruction or will pay my charges.

9.11 I am not aware of any potential conflict of interest.

9.12 I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those within my own knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

Louise Hooper BA (Hons) L Arch CMLI

Chartered Landscape Architect

Principal, Louise Hooper Landscape Architect