

## **TANDRIDGE DISTRICT COUNCIL: LAND SOUTH OF BARROW GREEN ROAD, OXTED**

**APPLICATION REF: TA/2025/245**

### **LANDSCAPE CONSULTATION RESPONSE**

#### **Introduction**

1. This consultation report is prepared in response to the submission of an outline planning application for up to 190 residential dwellings, an 80-bed residential care home and associated infrastructure in relation to land to the south of Barrow Green Road, Oxted (the 'Site').
2. It will consider the anticipated implications of the proposals upon the Site and its landscape setting, and the visual amenity of those who currently view the Site.
3. It will particularly consider the effects upon the Surrey Hills National Landscape, a nationally important landscape whose boundary currently lies to the north of the Site, but which is anticipated to wash over the Site in the near future.

#### **Description of the Site and its Immediate Setting**

4. The Site currently comprises approximately 9.7 hectares of gently sloping arable farmland with an area of tall herb vegetation to the south-west. An aerial photograph of the Site is reproduced as Figure 1 below.
5. The Site is bisected by Public Bridleway Oxted 97, which runs through it in a north-south direction, connecting Oxted to the south with the Surrey Hills to the north via Chalkpit Lane. The bridleway is marked by a corridor of vegetation, and it is well used by the public. A desire line path runs around the edge of the Site, which is also used by the public for circular walking, and there is an informal entrance from Wheeler Avenue.
6. A mature field ash tree is located in the southern part of the Site, and a cluster of oak trees is located at the northern end of the public bridleway.
7. The Site is bound on all sides by mature native vegetation, which serves to partially separate it from the adjacent settlement, creating a sense of isolation within some parts. The only clear views into the Site from adjacent land are from the cemetery to the east. Figure 2 illustrates the view towards Wheeler Avenue from the Site, demonstrating the extent to which the adjacent settlement is obscured.

8. The settlement of Oxted is present to the south, east and north-east of the Site, although the Site is separated from residential areas by the grounds of the Grade I Listed St Mary's Church to the east, and by a railway line to the north. Wheeler Avenue is located directly to the south, with dwellings arranged perpendicular to the Site as shown on Figure 1.

***Figure 1: Google Earth aerial photograph of the Site and its landscape context***



***Figure 2: View south from the Site towards Wheeler Avenue***



9. The land to the south-west, west and north-west of the Site is largely rural in character, including The Bogs to the south-west, an area of ancient semi-natural wet woodland, part of which is included within the Site boundary. The Site's western boundary largely comprises a wooded stream corridor, which is one of the headwaters of the River Eden. An area of scrubland and woodland is located to the north of Barrow Green Road and west of Chalkpit Lane.
10. The Surrey Hills National Landscape forms a strong topographic backdrop to the north of the Site, with clear views of wooded slopes and open ground, as illustrated by Figure 3 below. The Site therefore lies within the setting of the National Landscape. Figure 3 also serves to illustrate the arable character of the Site, and its immediate wooded context. The public bridleway that runs through the Site can be seen to the right of the image.
11. The hills to the north of the Site are crossed by the North Downs Way National Trail and the Vanguard Way Long Distance Recreational Route, and several promoted viewpoints on the slopes include views of the Site in context with the wider landscape.

***Figure 3: View towards the Surrey Hills National Landscape from the Site***



## Published Character of the Wider Setting

### *National Level Assessment*

12. Natural England's National Character Assessment places the Site within the Wealden Greensand National Character Area (NCA 120). This is broadly described as a long, curved belt of land with a significant proportion of woodland cover comprising ancient woods and more recent conifer plantations, in addition to more open areas of heath on acidic soils, river valleys and mixed farming, including areas of fruit growing.
13. The key characteristics for the Wealden Greensand are as follows, with those considered representative of the Site and its setting highlighted in bold text:
  - **A long, narrow belt of Greensand, typified by scarp-and-dip slope topography, including outcrops of Upper Greensand, Gault Clay and Lower Greensand. The Greensand forms escarpments separated by a clay vale: the overall undulating and organic landform – particularly in the west – gives a sense of intimacy to the landscape. Leith Hill in Surrey is the highest point in south-east England.**
  - **There are extensive areas of ancient mixed woodland of hazel, oak and birch, with some areas having been converted to sweet chestnut coppice in past centuries. These areas reflect the diverse geology, including the distinctive chalk grassland elements within the East Hampshire Hangers Special Area of Conservation (SAC), the wooded commons ('charts') of East Surrey and West Kent, and conifer plantations.**
  - Semi-natural habitats include: remnant lowland heathland, mostly concentrated in West Sussex, Hampshire and West Surrey; the wetlands associated with the River Arun in West Sussex; and unimproved acid grasslands found in commons, parklands, heathland and other areas of unimproved pasture.
  - **Fields are predominantly small or medium, in irregular patterns derived from medieval enclosure. Boundaries are formed by hedgerows and shaws, with character and species reflecting the underlying soils. On the clay, hedgerows are dense and species-rich, with occasional standard oaks. On more acidic soils they generally consist of hawthorn and blackthorn, also with occasional oak trees, and often trimmed low.**
  - **Agricultural land comprises a mosaic of mixed farming, with pasture and arable land set within a wooded framework. There is a fruit-growing orchard belt in Kent and also around Selborne in Hampshire.**



- **The rural settlement pattern is a mixture of dispersed farmsteads, hamlets and some nucleated villages. Large houses set within extensive parks and gardens are found throughout the area.**
  - In the east of Kent, the Wealden Greensand has a gentler and more open aspect than in the wooded west. This part of the area is also more marked by development, with the presence of major towns and communication corridors such as the M26, M25 and M20 motorways and railway lines including the Channel Tunnel Rail Link (High Speed 1).
  - The local built vernacular includes the use of Greensand, ragstone and, in the west, malmstone, bargate stone, plus dark carrstone patterned in the mortar between stones ('galleting') in Surrey, as well as timber-framing and weatherboarding.
  - There are a range of historic landscape features, including field monuments, old military defences, prehistoric tumuli, iron-age hill forts, Roman forts, the Royal Military Canal, small quarries and relics of the iron industry (including hammer ponds). Sunken lanes cut into the sandstone are a historic and characteristic feature, as are older deer parks and more recent 18<sup>th</sup>-century parklands.
  - Surface water is an important feature across the Greensand, with many streams and rivers passing through the NCA: the Western Rother, Wey, Arun, Medway and the Great and East Stour.
  - The Greensand ridge meets the coast of Kent between Folkestone Warren and Hythe. While most of the coastal strip is now built up and protected by sea defences, the undeveloped sea cliffs at Copt Point provide important geological exposures, are designated for their nature conservation interest and fall within the Dover–Folkestone Heritage Coast.
14. Based upon the above analysis, the Site and its setting are considered to be moderately representative of the Wealden Greensand National Character Area.

***Local Level Assessment: Surrey Landscape Character Assessment (2015)***

15. The Surrey Landscape Character Assessment places the Site within the Merstham to Clacket Lane Greensand Valley Character Area, associated with the Greensand Valley Landscape Type. The Site also has a strong perceptual relationship with the slopes of the Box Hill to Tatsfield Chalk Ridge Character Area, associated with the Chalk Ridge Landscape Type, which forms the backdrop to the north of the Site as illustrated by Figure 3.

16. The key characteristics of the **Greensand Valley Landscape Type** are as follows, with those considered representative of the Site and its setting highlighted in bold text:

- **Valley based on greensand with alluvium, diamicton and sand and gravel drift geology.**
- **Moderately flat or gently undulating farmland enclosed by the North Downs scarp to the north and the hills of the greensand ridge to the south.**
- **The area is crisscrossed the headwaters of a number of important river catchments. The Pipp Brook which flows in to the River Mole, the Tillingbourne which flows in to the Wey, and the River Eden**
- Presence of the Tillingbourne with ponds, streams and weirs and the Pipp Brook with lakes, ponds and streams.
- The Tillingbourne, flowing west, is set within an intimate, small scale valley floor with a chain of historic villages set amongst pastures, woodland and parkland.
- The Pipp Brook, flows east to the River Mole around Westcott and through Dorking.
- **The headwaters of the River Eden flows south from Godstone and Oxted towards Edenbridge in Kent.**
- **Semi-enclosed area with rural views to the open pastoral valley sides, the North Downs scarp and the wooded slopes of the greensand hills.**
- **Contains east west transport links running parallel with the scarp to the north.**
- **Historic landscape pattern based on mixed farming on the easily cultivated lighter soils between the chalk of the North Downs and the heavier clay soils of the low weald.**

17. Based upon the above analysis, the Site and its setting are considered to be strongly representative of the Greensand Valley Landscape Type, representing all key characteristics that are not precluded by geography.

18. The assessment lists the following key positive landscape attributes for this landscape type, with those considered representative of the Site and its setting highlighted in bold text:

- Enclosed intimate valley floor landscape west of Dorking.
- **Between east of Dorking and Oxted, wider valley floor of undulating farmland form foothills of North Downs.**
- **Dramatic views of North Downs scarp slope.**

- **Open pastoral, unsettled lower slopes of valley sides.**
- Views across pastures to wooded hills of North Downs to north and Greensand hills to south, often simultaneously.
- **Varied woodland including valley floor woods and ancient woodland.**
- **Watercourses and water bodies associated with River Eden, Tillingbourne and Pipp Brook.**
- River Tillingbourne and linked historic remnants of former industries such as gunpowder manufacturing, mill ponds, fishing lakes, weirs and watercress beds.
- Historic parks and gardens forming large blocks of landscape with a parkland character.
- **Historic village centres and manors.**

19. It is therefore considered that the Site and its setting represent all but two of the key positive attributes of this landscape that are not precluded by geography.

20. The overall strategy for the Greensand Valley Landscape Type is to conserve the rural character of the open pastoral valley sides, the historic village cores, the varied water bodies, the historic parks and gardens and the views to the wooded backdrop of the greensand hills and chalk downs.

21. The Merstham to Clacket Lane Greensand Valley Character Area is the easternmost expression of the Landscape Type within the County, between the chalk ridge to the north and more wooded greensand hills to the south.

22. The key characteristics of this Character Area are as follows, with those considered representative of the Site and its setting highlighted in bold text:

- **Underlain by Folkestone Formation Sandstone, with areas of Gault Formation Mudstone to the north.**
- **Undulating landform, rising up to meet the chalk ridge scarp to the north and wooded greensand hills to the south.**
- **The predominant land use consists of medium-large scale, open arable fields, but there is a mixture of other uses including, generally smaller pastoral fields, large scale sand quarry workings, golf courses, road and motorway corridors and settlement.**
- **Blocks of woodland occur across the character area, with more substantial areas of woodland to the west of Oxted. Hedgerows line field boundaries, but are limited**

in some places with larger arable fields. Smaller parcels of land associated with settlement often have good tree cover. There is ancient woodland, the size and occurrence increasing at the eastern end of the character area.

- Northerly views from the character area include the chalk ridge scarp.
- The M25 motorway runs along the length of the northern edge of the character area. Junctions 6, 7 and the Clacket Lane services, of the M25 are located within the character area. A limited number of roads, including the A25 and rural lanes cross the character area.
- A comprehensive network of public rights of way criss-cross every part of the character area, including the Tandridge Border Path, Greensand Way and Vanguard Way Recreational Paths and the North Downs National Trail.
- The character area includes the village of Godstone and settlements such as Merstham, and wraps around Oxted and Bletchingley. Elsewhere, there are isolated dwellings and farmsteads, with settlement becoming more limited at the eastern end of the character area. Merstham is a linear, low density settlement designated as a Conservation Area, and is encircled by motorway, road and rail routes at the north-west corner of the character area.
- There are a number of other Conservation Areas, including Pendell Court and Place Farm and Brewer Street, at the western end of the character area, and Godstone in the centre of the character area. The character area includes a small area of registered common land at Clacket Common in the eastern end of the character area, a few scheduled monuments, and part of the historic park/garden at Titsey Place.
- There are a number of small woodland areas designated as Sites of Nature Conservation Importance. A few larger blocks of woodland are designated as Sites of Special Scientific Interest, around Titsey Woods.
- **Relatively rural landscape, with tranquillity and remoteness varying across the Character Area due to the degree of urban influence from settlement and roads.**

23. Based upon the above analysis, the Site and its setting are considered to be strongly representative of the Merstham to Clacket Lane Greensand Valley Character Area.



## **Current Policy Context**

### ***National Planning Policy Framework (NPPF)***

24. Chapter 15 of the NPPF relates to the conservation and enhancement of the natural environment. Within this chapter the following paragraphs are considered to apply in the context of landscape and visual impacts.
25. Paragraph 187 states that planning policies should contribute to and enhance the natural and local environment by a range of measures including protecting and enhancing valued landscapes (in a manner commensurate with their statutory status or identified quality in the development plan) and recognising the intrinsic character and beauty of the countryside.
26. Paragraph 189 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. It further 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.

### ***Tandridge Core Strategy 2008***

27. The Tandridge District Core Strategy was adopted by the Council in October 2008, and it forms the Part 1 Local Plan, setting out key planning policies for the District.
28. Policy CSP18 relates to character and design. It requires new development within the countryside to be of a high standard of design that must reflect and respect the character, setting and local context, including those features that contribute to local distinctiveness. It states that the Council will apply the principle of “*good enough to approve rather than bad enough to refuse*”.
29. Policy CSP20 specifically relates to National Landscapes, previously titled as Areas of Outstanding Natural Beauty. It states that the conservation and enhancement of the natural beauty of the landscape is of primary importance within the two Areas of Outstanding Natural Beauty, reflecting their national status. It then sets out a range of key principles to be followed, including:
- Conserve and enhance important viewpoints, protect the setting and safeguard views out of and into the AONB.*

30. Policy CSP21 relates to landscape and countryside and reads as follows:

*The character and distinctiveness of the District's landscapes and countryside will be protected for their own sake, new development will be required to conserve and enhance landscape character.*

***Tandridge Local Plan: Part 2 – Detailed Policies 2014***

31. The Tandridge Part 2 Local Plan was adopted in July 2014, and it contains a set of detailed planning policies to be applied locally in the assessment and determination of planning applications over the plan period (2014-2029).

32. Policy DP7 is a general policy covering all new development, and it seeks to secure a high standard of development throughout the district. It includes the following provisions:

*All new development will be expected to be of a high quality design. Development should integrate effectively with its surroundings, reinforcing local distinctiveness and landscape character. Innovative designs will be encouraged where appropriate.*

*The proposal respects and contributes to the distinctive character, appearance and amenity of the area in which it is located with layouts that maximise opportunities for linkages (for example footpaths and cycle paths) to the surrounding area and local services.*

***Surrey Hills Management Plan 2020-2025***

33. This statutory document presents an overall vision for the Surrey Hills National Landscape, defines its Special Qualities, and sets out policies to achieve that vision.

34. The Surrey Hills was one of England's first National Landscapes (then Areas of Outstanding Natural Beauty), designated in 1958, and the purpose of the designation is to protect the Special Qualities of this nationally important landscape.

35. The Statement of Significance for the National Landscape reads as follows:

*"The Surrey Hills AONB is one of England's finest landscapes, equivalent in beauty to a National Park and designated an Area of Outstanding Natural Beauty in 1958.*

*Its landscape mosaic of farmland, woodland, heaths, downs and commons has inspired some of the country's greatest artists, writers and architects over the centuries. The AONB includes internationally and nationally important priority habitats which support protected species.*

*The Surrey Hills attract millions of visitors every year who contribute to the economy of the area. The Hills are protected as part of London's Metropolitan Green Belt and provide an outstanding natural resource for London and Surrey residents to enjoy*

*outdoor pursuits, taste local food and drink, and to explore market towns and picture-postcard villages.”*

36. The overall vision for the National Landscape is as follows:

*“The Surrey Hills AONB is recognised as a national asset in which its natural and cultural resources are managed in an attractive landscape mosaic of farmland, woodland, heaths, downs and commons. It provides opportunities for business enterprise and for all to enjoy and appreciate its natural beauty for their health and well-being.”*

37. Under the topic of ‘Planning’, the importance of the setting of the National Landscape is recognised, with the overall Aim reading as follows:

*“New development enhances local character and the environmental quality of its nationally important setting.”*

38. This section also recognises the pressure of development within the National Landscape, with housing development identified as the primary pressure and threat within the area. It identifies the potential for piecemeal expansion of developed areas to harm this nationally important landscape, stating that:

*“The cumulative effects of many, often small, developments over decades and centuries would reduce the landscape and scenic beauty of the Surrey Hills and spoil it for future generations.”*

39. Policy P6 specifically relates to the setting of the National Landscape, and reads as follows:

*“Development that would spoil the setting of the AONB by harming public views into or from the AONB will be resisted.”*

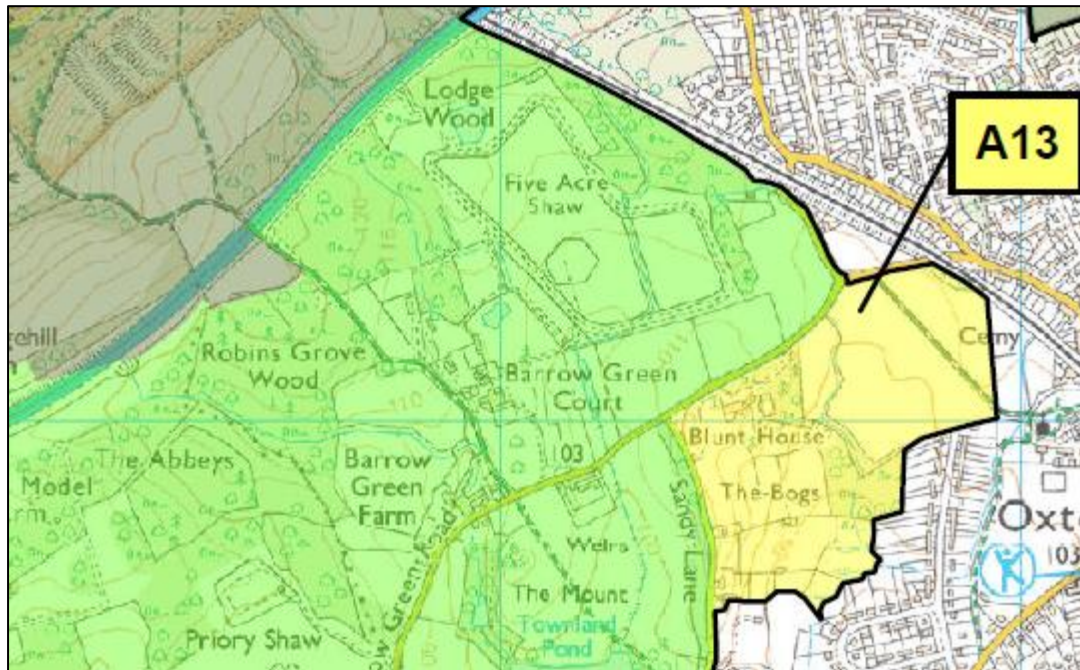
### **Surrey Hills National Landscape Extension**

40. The Surrey Hills National Landscape Boundary Variation Project is part of a wider project that has been active since 2021. It originally considered a number of National Landscape extensions and designations, but is now focussing on the Surrey Hills extension and the designation of the Yorkshire Wolds.

41. The Surrey Hills aspect of the project has been subject to its second and final round of public consultation from September to December 2024, and the results of the consultation have been published. This included alterations to the National Landscape boundary that had arisen from the first round of consultation undertaken in 2023. It is therefore considered that the project is at an advanced stage, with 9 of the 12 steps completed.

42. The Site is located in the Godstone Hills area of study. The latest consultation plans for the Godstone Hills are presented as Figure 24b within the pack of documents for the second consultation. An extract of the area closest to the Site is reproduced as Figure 4 below.

**Figure 4: Extract showing proposed National Landscape extension**



43. As Figure 4 shows, the proposals for the extension of the National Landscape boundary now show an additional area, referenced A13, extending eastwards of Sandy Lane and Barrow Green Road towards the edge of Oxted, including the Site.
44. It is therefore considered highly likely that in the near future the Site will be located within the Surrey Hills National Landscape, and therefore subject to the greater level of policy protection associated with the designation.

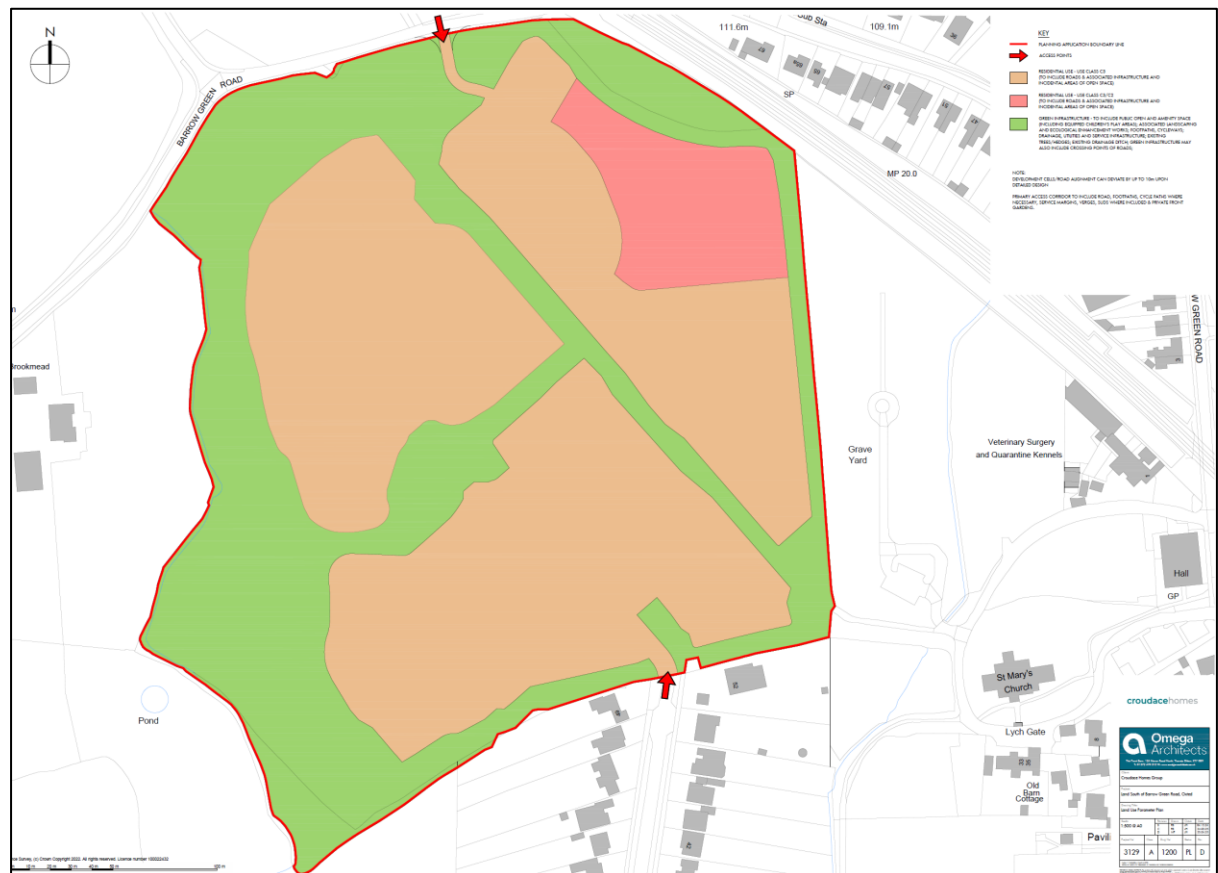
### **Description of the Proposed Development**

45. The proposed development is described as follows:

*Outline application for a residential development of up to 190 dwellings (including affordable homes) (Use Class C3), an extra care facility with up to up 80 beds (Use Class C2), together with the formation of vehicular access, landscaping, parking, open space, green and blue infrastructure, and all other associated development works. All matters reserved except access.*

46. A Land Use Parameter Plan has been submitted for the proposed development, and this is reproduced a Figure 5 below.

**Figure 5: Submitted Land Use Parameter Plan**



47. The Parameter Plan shows the main residential areas arranged in three parcels in the centre of the Site. The residential care facility is located in the north-eastern corner of the Site.
48. Access to the Site is proposed via connections to Barrow Green Road to the north and Wheeler Avenue to the south.
49. Green infrastructure is proposed around the periphery of the Site, and between the residential parcels although it is noted that this would include road crossings that would truncate the corridors. The majority of the green infrastructure area occurs along the western and northern boundaries, providing an offset of the built parcels from The Bogs and Barrow Green Road, and retaining the area of existing woodland that falls within the Site.
50. An Illustrative Masterplan has also been submitted, to indicate how the layout might be achieved within the Site, and this is reproduced as Figure 6 below.



**Figure 6: Illustrative Masterplan**



51. Figure 6 indicates that the dwellings are proposed to be arranged in a standard perimeter block layout, with street trees planted throughout the area.
52. The public bridleway within the Site is anticipated to experience the greatest character change, with the illustrative design showing it possessing the character of a boulevard with dwellings on either side and formal surfacing.



53. The green spaces within the illustrative scheme comprise a combination of formal and less formal public parks with water bodies located within the belt of open space to the west.

### **Submitted Landscape and Visual Impact Assessment**

54. The Applicant has submitted an Environmental Statement as part of the application, which includes a chapter covering landscape and visual effects. This has been prepared by a Chartered Landscape Architect.

55. This is compliant with the Guidelines for Landscape and Visual Impact Assessment Third Edition, which is the current guidance.

56. I will discuss various sections of the LVIA in the following paragraphs.

#### ***Published assessments***

57. The LVIA correctly identifies the published character areas in which the Site is located, although it does not reference the relevant Landscape Types, which are equally relevant.

58. In paragraph 12.4.27 it presents an abbreviated list of the key characteristics of the Merstham to Clacket Lane Greensand Valley Character Area, with no explanation given as to why this is the case. I have presented the full list above with my analysis of the level of representation of the various receptors.

#### ***'Valued' landscape***

59. With regard to whether the landscape in which the Site is located is a 'valued' landscape for the purposes of paragraph 187 of the NPPF, the LVIA applies an incorrect test, stating that *"The Site itself is not subject to a designation which would denote value and under the meaning intended of para 187a) of the NPPF, is not a 'valued landscape'."*

60. This is the opposite of the intention within the NPPF, as established in case law by the judgement of Ouseley J<sup>1</sup>, which stated in its paragraph 13 *"The Inspector, if he had concluded, however, that designation was the same as valued landscape, would have fallen into error. The NPPF is clear: that designation is used when designation is meant and valued is used when valued is meant and the two words are not the same."*

61. Subsequently to this, the Landscape Institute has published its Technical Guidance Note 02/21: Assessing Landscape Value Outside National Designations. This presents the definition of a 'valued' landscape as:

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<sup>1</sup> Stroud District Council vs. Secretary of State for Communities and Local Government [2015] EWHC 488 (Admin)

*“A ‘valued landscape’ is an area identified as having sufficient landscape qualities to elevate it above other more everyday landscapes.*

62. The LVIA in its Table 12.11 assess the Site itself against the Landscape Institute’s latest value criteria, as set out in its Technical Guidance Note 02/21, but this again is the incorrect approach because it only examines the Site itself and not the landscape context in which it occurs, for example its score for the natural heritage criterion is low despite the Site containing an area of ancient semi-natural woodland that is a candidate Site of Nature Conservation Importance. I have therefore presented my own assessment of the Site and the landscape it occurs within in the box below, which I assert is the correct approach.

Factor	Commentary
Natural heritage	The Site itself largely comprises arable land although it contains a number of mature trees and there is an area of tall herb vegetation in its western part. It contains an area of woodland that forms part of The Bogs, an area of ancient semi-natural woodland and candidate SNCI. A further small area of woodland is located at the north-eastern end of the Site. The contribution to this factor is therefore high.
Cultural heritage	The Site does not contain any heritage assets, but it is adjacent to the churchyard of the Grade I Listed Church of St Mary, and it contains an area of ancient woodland. The contribution to this factor is therefore medium.
Landscape condition	The Site represents an area of well-managed arable land. The landscape in which it is located is in good condition with a healthy structure and a high proportion of trees and woodland. The landscape is of sufficient intactness to be promoted by Natural England as part of the extended Surrey Hills National Landscape. The contribution to this factor is therefore high.
Associations	There are no known associations with the Site and its landscape setting.
Distinctiveness	The Site is strongly representative of the published character of the Greensand Valley. The Site and its setting form the outlook from the Surrey Hills National Landscape. The contribution to this factor is therefore high.
Recreational	The Site contains a public bridleway that is a key connection between Oxted and the Surrey Hills National Landscape. The surrounding landscape contains the North Downs Way National Trail and a number of Long Distance Recreational Routes. The valley slopes to the north of the Site are designated Open Access Land, and the cemetery immediately

	east of the Site is also publicly accessible. The contribution to this factor is therefore high.
Perception (scenic)	The Site forms part of the outlook from the Surrey Hills National Landscape, and it is at an advanced stage of consideration for inclusion within the National Landscape. The contribution to this factor is therefore high.
Perception (wildness and tranquillity)	The Site represents an area of arable land, with some woodland and tall herb vegetation. It adjoins the settlement of Oxted and there is background noise from the railway and M25 motorway, but the strongly vegetated boundaries lend it a sense of seclusion in places. The contribution to this factor is therefore medium.
Functional	The Site is largely arable, but it also contains wet woodland that provides a variety of environmental functions as part of the wider complex of The Bogs. Its boundaries provide important green infrastructure connections to the wider landscape, and the bridleway that crosses it performs an important social function. The contribution to this function is therefore high.

63. Based upon the above assessment, it is my conclusion that the Site is located within a 'valued' landscape. This is supported by the promotion of this land by Natural England for the inclusion within the Surrey Hills National Landscape as follows<sup>2</sup>, which specifically names the Site (Stoney Field):

*"This area was included within the Candidate Area and noted as containing natural heritage features. Natural England agrees that these areas form part of a sweep of landscape up to the settlement boundary and that Stoney Field affords dramatic views of the chalk scarp."*

64. It is therefore the case that national planning policy requires this landscape to be protected and enhanced, in addition to the protections afforded to it by its association with the National Landscape.

#### ***Value of landscape receptors***

65. The LVIA identifies the following four landscape receptors of the proposals, with their respective landscape value scores:

- The Site: Medium value

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<sup>2</sup> Statutory Consultation Analysis Appendix 16: Godstone Hills

- Trees and vegetation within the Site and on its boundaries (including The Bogs): High value
- Areas of LCA GV4 outwith the Surrey Hills AONB: Medium value
- The Surrey Hills AONB: High value

66. Based on my assessment of the Site against established value criteria, and its important role within the setting of a National Landscape, I consider it to be of High value.

67. I am unclear as to why the trees within the Site and on its boundaries have been attributed a higher value than the Character Area that forms the immediate setting to the Surrey Hills National Landscape. In my opinion, this should be of High value, reflecting its important role as the outlook to the Surrey Hills.

#### ***Sensitivity of landscape receptors***

68. I am generally in agreement with the susceptibility scores given for the receptors, but as noted above, I am of the opinion that the value of the receptors is under-stated. I therefore consider the respective sensitivity of the landscape receptors to be as follows:

- The Site: High sensitivity
- Trees and vegetation within the Site and on its boundaries (including The Bogs): High sensitivity
- Areas of LCA GV4 outwith the Surrey Hills AONB: Medium to high sensitivity
- The Surrey Hills AONB: High sensitivity

#### ***Sensitivity of visual receptors***

69. I am generally in agreement with the attributed sensitivity scores within the LVIA, although I disagree with the findings in relation to the two public highways.

70. Receptor RD01 relates to the users of Barrow Green Road and Chalkpit Lane, and it attributes Low susceptibility to these users on the basis that they are “*travelling by road and their attention is unlikely to be focused on the landscape*”. This may be the case for car users, but pedestrian and cycle users of this rural public highway, which provides the link between the bridleway crossing the Site and the Surrey Hills, are far more likely to be focussed on their setting. I therefore consider the susceptibility of this receptor to be Medium and therefore the overall sensitivity to be Medium.

71. A Low susceptibility is also applied to receptor RD02, with identical justification text used. It is important to bear in mind that Wheeler Avenue is a residential cul-de-sac and therefore the phrase “*travelling by road*” is rather misleading, implying that they would

be moving at traffic speeds. Users of this highway are likely to be residents accessing their homes and those of their neighbours or walking towards the Site. I therefore consider the susceptibility of this receptor to be Medium and as such, the overall sensitivity to be Medium.

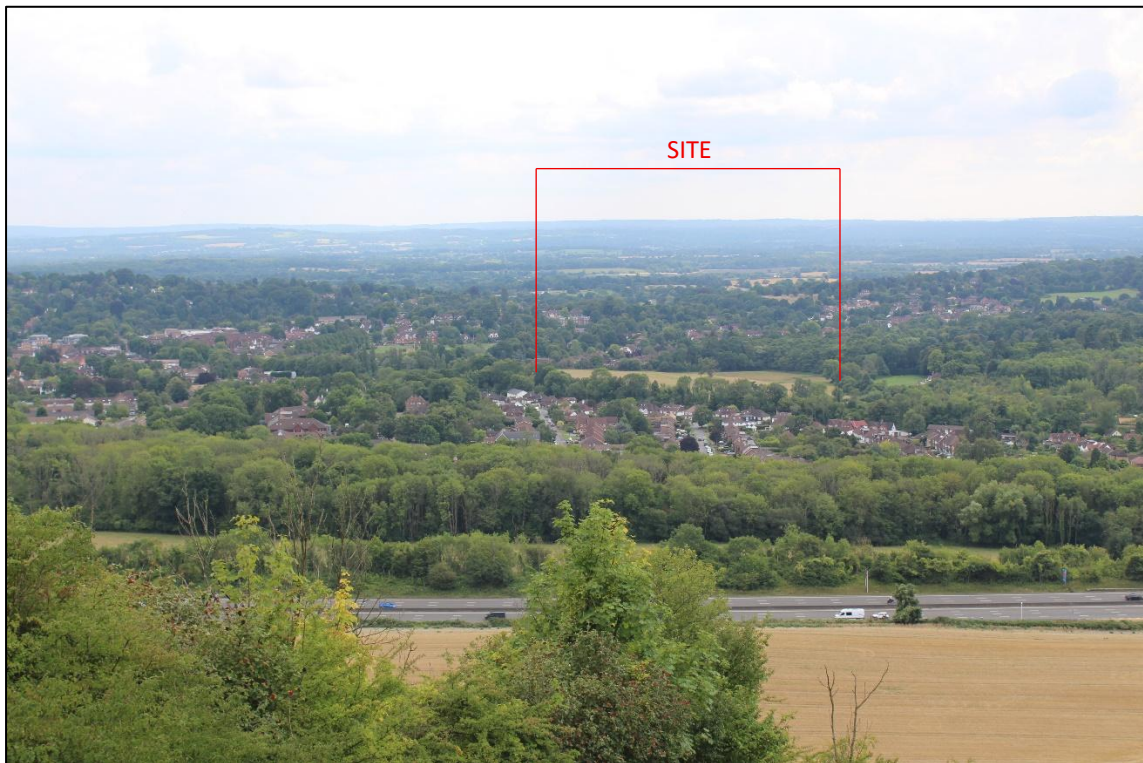
### ***Anticipated Landscape Effects***

72. Whilst I am in agreement with the majority of the receptor scores, in my opinion the score of Negligible magnitude in relation to the Surrey Hills National Landscape is simply not credible.
73. The Site is clearly visible in the outlook from the hills, and the views from the Site towards the hills are of such value that they were cited by Natural England as one of the main reasons for the Site's inclusion within the extended National Landscape.
74. The construction phase of the project would introduce a clearly incongruent element into the setting of the National Landscape, which would be prominent because of the inherent level of movement and noise associated with this phase. I therefore consider the magnitude of impact to be Medium, giving rise to an adverse effect of Major significance.
75. The LVIA has applied identical significance scores for the operational phase and therefore the same disagreement remains, that the fundamental and permanent alteration of the Site's relationship with the National Landscape and its contribution to the setting would give rise to a permanent adverse effect of Major significance.

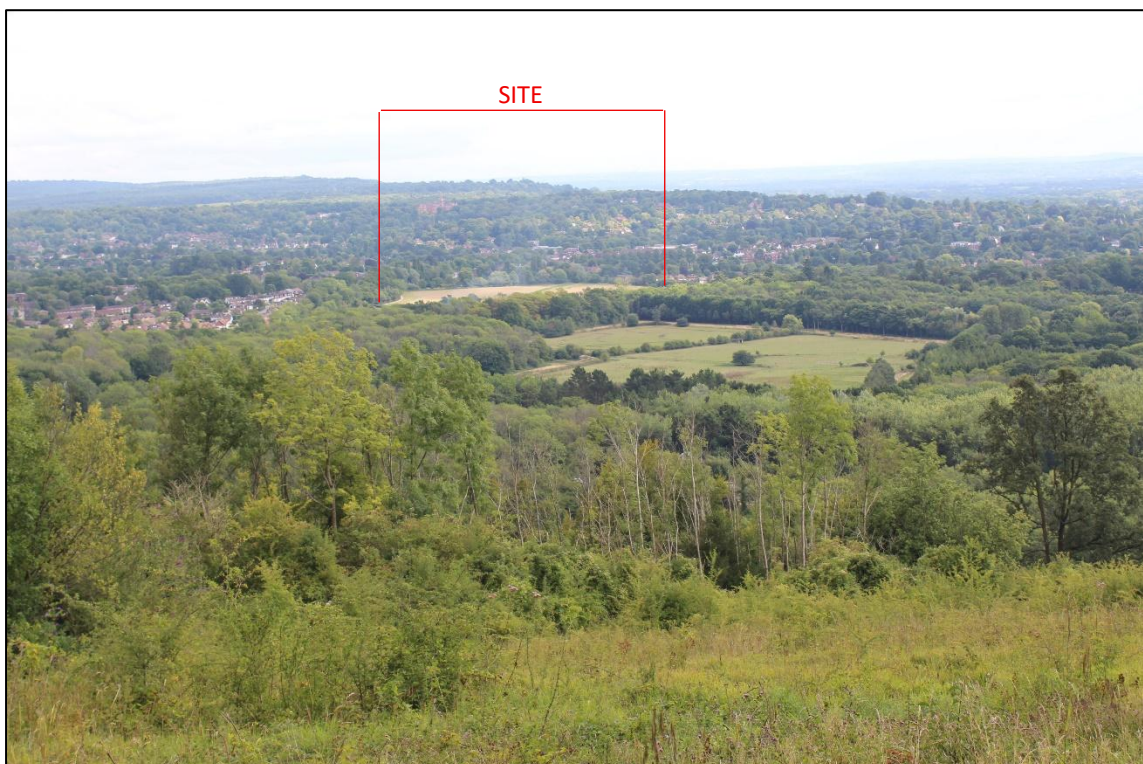
### ***Anticipated Visual Effects***

76. As noted above, I am of the opinion that receptors RD01 and RD02 are of Medium sensitivity, and therefore this would give rise to a Moderate adverse impact upon both receptors during the construction and operational phases.
77. My primary concern, however, lies with views from the Surrey Hills National Landscape, in which the Site is clearly visible and makes a notable contribution to the openness of the setting.
78. Figure 7 below was taken from the promoted viewpoint at Whistler's Steep, where a bench has been provided to enable the public to rest and enjoy the view. The public viewpoint is also located on the route of the Vanguard Way, a Long Distance Recreational Route. Given these factors, as well as its location within a nationally important landscape, I consider the view to be of the highest significance.
79. Similarly, Figure 8 was taken from a bench location on the North Downs National Trail, at Ganger's Hill, where the Site is clearly identifiable within the view from this promoted location.

***Figure 7: View towards the Site from Whistler's Steep (Vanguard Way)***



***Figure 8: View towards the Site from Ganger's Hill (North Downs Way National Trail)***





80. Given the level of visibility of the Site, I do not agree with the LVIA findings that the magnitude of impact upon this receptor during the construction and operational phases will be Negligible. In my opinion, the proposed development will be clearly visible from this elevated position at all stages, and therefore the magnitude of impact is Medium, giving rise to a permanent adverse effect of Major significance upon these highly sensitive views. I consider this judgement to be supported by the visualisations submitted by the Applicant, which demonstrate the prominence of the scheme within this view.

### ***Cumulative Effects***

81. I am in agreement with the LVIA that there will be no cumulative effects arising from this proposal in association with other schemes.

### **Conclusion**

82. The Site comprises an area of open arable land with some tall herb vegetation and two areas of woodland. The western area of woodland is part of The Bogs, an ancient semi-natural wet woodland. The Site is well used by the public, with a public bridleway running through it and a desire line path around its perimeter. It adjoins the town of Oxted, although strong vegetation on its boundaries limits the degree of perception between the Site and settlement.

83. The Site occupies a highly sensitive location, being located within the setting of the Surrey Hills National Landscape. I consider the Site to be located within a 'valued' landscape on account of its inherent qualities, and it is currently being promoted by Natural England for inclusion within the National Landscape. The Site and its setting are strongly representative of the published character of the Greensand Valley.

84. In my opinion, the submitted LVIA has underestimated both the baseline sensitivity and magnitude of impact in landscape and visual terms. In particular, I consider the judgement that the proposals would have a Negligible effect upon both the Site's relationship with the National Landscape and the views from it to be notable understatements that are contradicted by the Applicant's submitted visualisations.

85. I therefore conclude that the proposed development will result in permanent significant adverse effects upon multiple landscape and visual receptors, including the Site itself and the Surrey Hills National Landscape, and the recreational users of both of these areas.

86. The proposed development will therefore fail to protect and enhance the 'valued' landscape in which the Site is located. Furthermore, it does not minimise the adverse

effects within the setting of the Surrey Hills National Landscape and once the Site falls within this designation, it would not conserve and enhance its special qualities.

87. I recommend that the proposed development be refused planning permission on account of its significant harm to the character and appearance of the countryside, and the setting of the Surrey Hills National Landscape, and the consequent failure to satisfy national and local planning policy.

**Ian Dudley BSc(Hons) MICFor CEnv CMLI**