

# **Landscape rebuttal to TDC landscape Proof of Evidence**

Prepared by  
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Land South of Barrow Green Road, Oxted

**An appeal made under Section 78  
of the Town & Country Planning Act 1990**

**by**

**Croudace Homes Ltd**

**Appeal Ref: APP/M3645/3372747**

## **REBUTTAL OF TDC LANDSCAPE PROOF OF EVIDENCE**

### **CONTENTS**

1. Introduction
2. Photography of views within the Surrey Hills National Landscape
3. Sensitivity of LCA GV4

## 1. INTRODUCTION

- 1.1. This landscape rebuttal has been prepared in response to the Proof of Evidence prepared by Mr Ian Dudley on behalf of Tandridge District Council (TDC).
- 1.2. The rebuttal addresses two points:
  - the photography provided in Mr Dudley's proof of two views from within the Surrey Hills National landscape (SHNL); and
  - an inconsistency noted by Mr Dudley in the assessment of the sensitivity of landscape receptor Landscape Character Area (LCA) GV4 Merstham to Clacket Lane Greensand Valley in the submitted LVIA (Chapter 12 of the ES)<sup>1</sup>

## 2. VIEWS FROM SHNL TOWARDS THE APPEAL SITE

- 2.1. It is likely that all parties will refer to views towards the Appeal Site from the SHNL during the examination of landscape evidence at the inquiry. However, landscape and visual matters may be addressed before the Inspector has had an opportunity to visit these locations to experience the views and the Appeal Site within them for herself.
- 2.2. Whilst a two-dimensional photograph can never be a full substitute for what people would see in reality, it is desirable and best practice that any two-dimensional reproductions of views should represent as closely as possible the actual viewing experience, and not give undue prominence to any one particular element in the view.
- 2.3. In his proof, Mr Dudley includes photographs of two sensitive views from elevated locations within the SHNL towards the Appeal Site, referred to at paras 4.37-4.38 of his proof:
  - Figure 12: View towards the Site from Whistler's Steep (Vanguard Way); and
  - Figure 13: towards the Site from Ganger's Hill (North Downs Way National Trail)
- 2.4. However, both of the photographs reproduced in Mr Dudley's evidence are crops of a wider panorama and do not provide even an approximate understanding of the viewer's experience from these elevated locations within the SHNL.
- 2.5. Therefore, to assist the Inspector, should they be required in advance of her site visit, the wider panoramas of which the photos in Mr Dudley's proof form a part are provided appended to this note.

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<sup>1</sup> CD 1.22.L

2.6. Panoramic photographs of representative views from the SHNL are also provided in the Proof of Evidence of Ms Hooper prepared on behalf of the R6 party<sup>2</sup> and in the Appellant's landscape proof of evidence<sup>3</sup>.

### **3. SENSITIVITY OF LCA GV4**

3.1. In his proof, Mr Dudley notes that there is an inconsistency in the recording of the sensitivity of landscape receptor LCA GV4 in the Appellant's LVIA (Chapter 12 of the submitted ES).

3.2. To clarify, the assessed sensitivity of LCA GV4 in the Appellant's LVIA is medium, as described at para 12.4.59 of the ES, and not high, as shown in tables 12.13, 12.15 and 12.18 of the ES. The assessment of medium sensitivity derives from the appraisal of LCA GV4's landscape value and susceptibility to the change proposed – both assessed as medium - following the methodology detailed in section 12.3 of the ES and the matrix provided at table 12.8 of the ES.

3.3. The assessments of the significance of residual effects on LCA GV4 are correctly recorded in tables 12.13, 12.15 and 12.18 of the ES.

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<sup>2</sup> CD8.1B; Viewpoint 9, page 42

<sup>3</sup> CD 6.10; Appendix EB2, Views 5 and 6

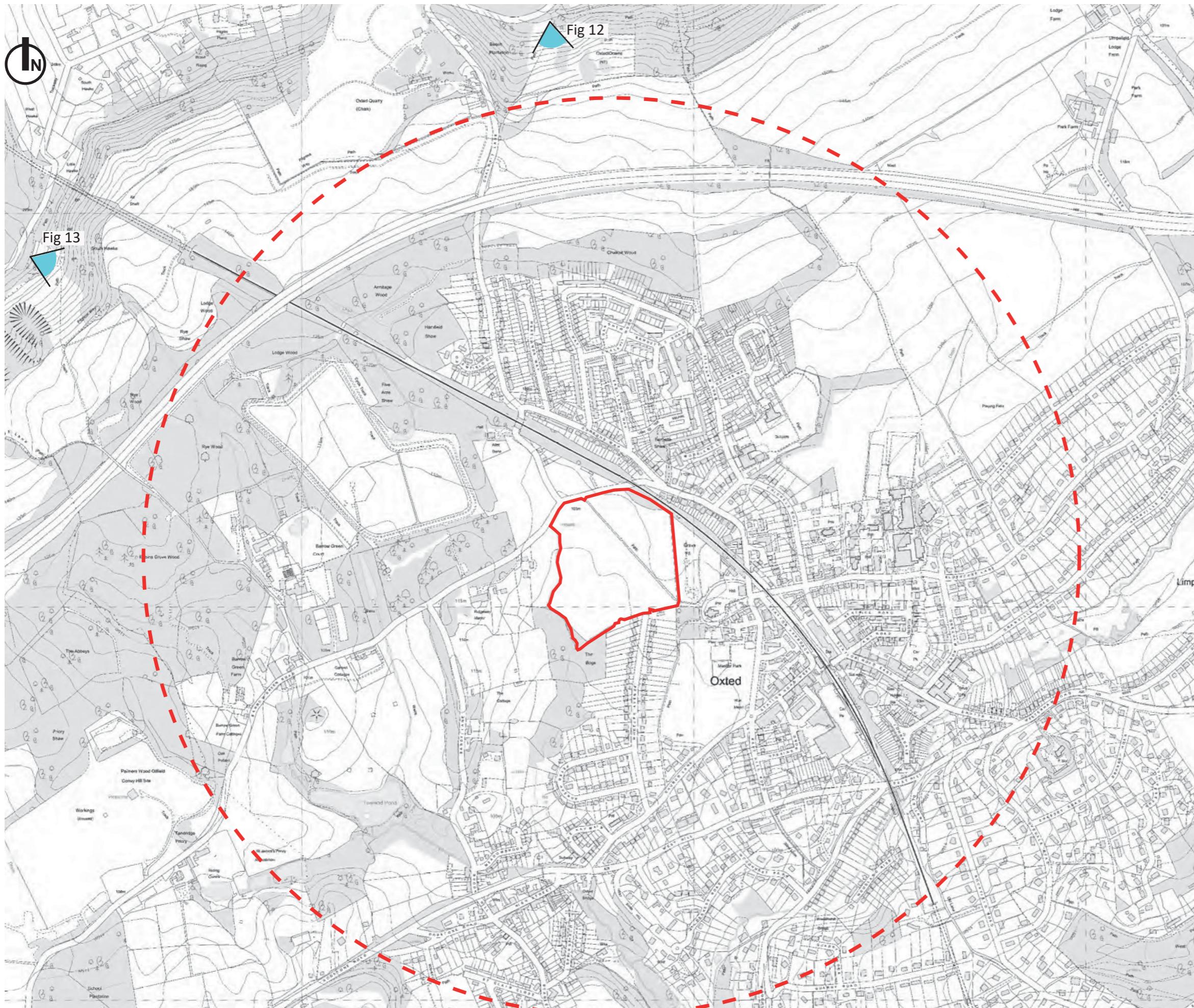




Figure 12: View from Whistler's Steep (Landscape Proof of Evidence of Mr Dudley)



Panorama of view from Whistler's Steep (January 2026)

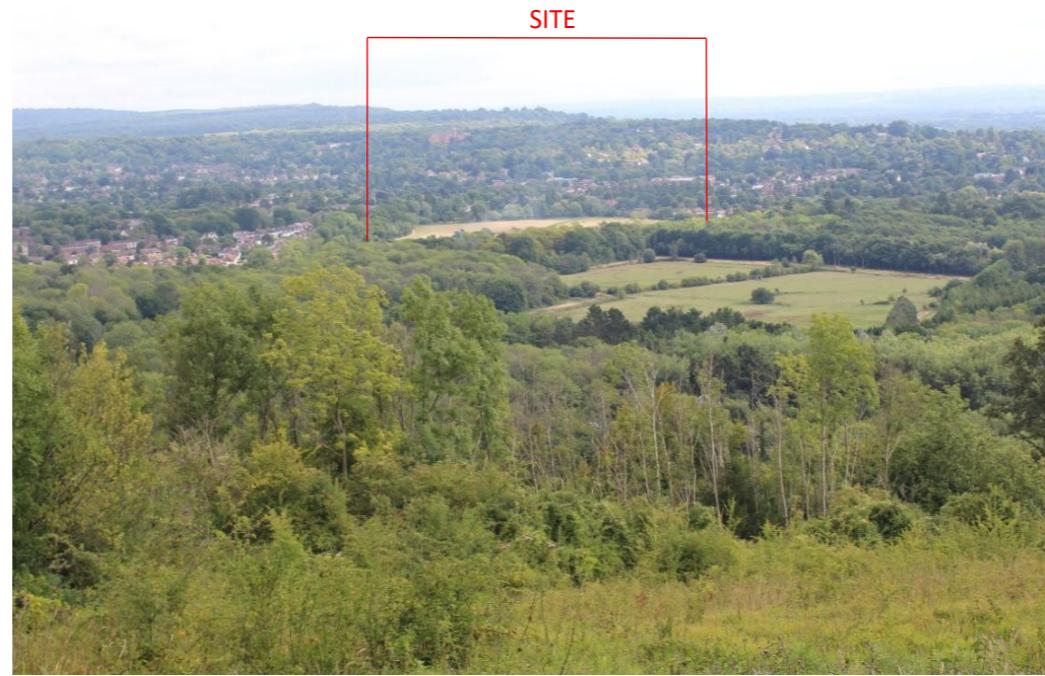


Figure 13: View from Ganger's Hill (Landscape Proof of Evidence of Mr Dudley)



Panorama of view from Ganger's Hill (January 2026)

