

Land at the Old Cottage, Station Road, Lingfield

Summary Landscape and Green Belt Purposes Proof of Evidence

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Of LDA Design Consulting

On behalf of

Woolbro Group and Morris Investment

29.06.23

LPA Ref. 2022/685

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Contents

1.0 Summary.....	1
2.0 Conclusions.....	7

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1.0 Summary

1.1.1. My name is Ben Croot. My qualifications and experience are set out in **Section 1.0** of my main Proof of Evidence ('proof').

1.1.2. My evidence has been prepared on behalf of Woolbro Group and Morris Investment ('the Appellant') against the non-determination of planning application reference 2022/685 for outline planning permission (with all matters reserved apart from access and layout) for a residential development of 99 dwellings (40% affordable) with associated access, formal open space, landscaping, car & cycle parking and refuse. ('the Proposed Development') at land at the Old Cottage, Station Road, Lingfield ('the Appeal Site').

1.1.3. My evidence addresses (in part) putative Reason for Refusal (RfR) (1) in relation to Green Belt and also putative RfR 3 in relation landscape and visual matters.

1.1.4. **Section 3.0** of my proof sets out the background to the appeal and **Section 4.0** planning policy in relation to Green Belt and landscape and visual matters.

1.2. Landscape Design Evolution

1.2.1. I have been personally involved with the project from its early genesis and been able to shape the proposals as part of a 'landscape led' design. **Figure 3** and **Figure 4** illustrates the key landscape principles that have underpinned the Proposed Development. These are:

- The retention, set back of development from, and enhancement with new planting of footpath 381a as part of an east to west 'green spine'.
- The provision of green space adjacent to footpath 381a forming a central 'green heart' to the Proposed Development.

- The provision of Public Open space (POS) and Sustainable Drainage (SUDs) in the southeast of the Appeal Site adjacent to Station Road/Town Hill junction.
- The retention of existing internal and boundary vegetation wherever possible.
- The sensitive design response to dwellings that back on to the Appeal Site.
- The active frontage of Proposed Development onto POS and outward on to Station Road and Town Hill.
- The use of existing local landmarks such as the spire of the St Peter's and St Paul's Church to anchor the Proposed Development in its sense of place.

1.2.2. Further design amends have been made on the basis of advice from Dr Edis:

- Further reduction of the development area in the north of the Appeal Site within Lingfield Conservation Area to reduce potential heritage impacts.
- Further offset of built form from heritage assets at New Place to provide greater areas of POS.

1.2.3. TDC has allocated the Appeal Site for development for 60 dwellings under Policy HSG12 within the emerging Local Plan. It is my own view the Appeal Site is capable of accommodating more than 60 dwellings acceptably in landscape and visual terms subject to the principles above and it is right that the Development of any site, whether it is in the Green Belt or not, makes most efficient use of that land once the principle of development has been established.

1.3. Consideration of 'Valued Landscape'

1.3.1. I have undertaken a valued landscape assessment of the Appeal Site using the Landscape Institute's Technical Guidance Note 02/21: Assessing Landscape Value Outside National Designations (TGN 02/21) at **Section 6.0** in my proof.

1.3.2. The value of the Appeal Site was assessed within the Landscape Capacity and Sensitivity Study Addendum (2017) which concluded the value of the Appeal Site to be of 'moderate' value with an overall value score of 20 (out of a possible 36)

and have 'medium' landscape capacity for development. Such a 'mid-range' score would not to me indicate it is a 'valued landscape' under paragraph 174 of the NPPF.

1.3.3. My assessment aligns with the 2017 Addendum study in that whilst the Appeal Site does have some features of value these are not sufficient in my view to warranty it being a valued landscape.

1.3.4. The Landscape and Visual Impact Assessment (LVIA), the methodology of which is not challenged by TDC, acknowledges this at **Section 5.7.2** and accordingly ascribes the Appeal Site a higher 'Local/District' value for the purposes of assessment.

1.3.5. Should the Inspector be minded to take a different view, it is also of note that a site found to be a 'valued landscape' is not a preclusion to development and by adopting the landscape led approach as summarised in **Section 2.0** demonstrates how the Proposed Development could be accommodated sensitively.

1.4. Landscape and Visual Assessment

Landscape Character

1.4.1. I concur with the findings of the LVIA in that there would be a 'Moderate' but 'Neutral' impact on landscape character of WF3: Horley to Swaynesland Low Weald Farmland Landscape within the Appeal Site and approximately 50m from it, reducing to 'Negligible' and 'Neutral' to the to the wider Horley to Swaynesland Low Weald Farmland character area as a whole. No other impacts to any other landscape character areas would occur.

1.4.2. Landscape character guidelines for Tandridge actively promote planting of trees and hedgerows. I do not therefore consider the planting proposed to be deleterious to landscape character.

Visual Impact

1.4.3. I also concur with the findings of the LVIA in relation to potential visual impacts in that they would be limited to the Appeal Site and its immediate context – Receptor Group 1. Impacts to Receptor Group 1 would be ‘Moderate’ and ‘Adverse’ but importantly these are not significant in landscape and visual terms. Visual receptors beyond this area would experience ‘Slight’ to ‘Negligible’ effects which are ‘Neutral’ in nature.

1.4.4. **Figure 7** of my proof illustrates the Zone of Visual Influence (ZVI) (indicated by a green line) which is very limited.

Impacts to Visual Amenity of Footpath 381a

1.4.5. **Figure 8** of my proof provides illustrative views along the footpath whilst **Appendix 2** provides a map extract from Natural England’s Green Infrastructure mapping tool illustrating the numerous natural spaces that exist within Lingfield.

1.4.6. The footpath has been retained in its existing alignment with built form offset from it at least approximately 12m at its closest point with a provision of POS, retention of existing vegetation and new planting. The only direct physical impact to it would be the proposed access crossing to the northern field parcel which utilises existing gateways and would have limited impact.

1.4.7. The provision of generous POS adjacent to it and new planting; and enhancement of the path’s surfacing and lighting would in my view overall improve what is

currently an uninviting route to the important transport node of Lingfield Railway Station.

Impacts on the Star Inn Public House Garden

1.4.8. Whilst this location lies within the Conservation Area, I do not agree that this view is a 'public viewpoint' as it is within the grounds of a public house that can only be accessible when the public house is open. Subsequently I would consider it to be 'semi-public'.

1.4.9. Whilst built form within the Appeal Site would be visible, it would be set back by approximately 39m from the boundary of the Star Inn garden and filtered by existing and new planting as part of the POS. It is my view there would be little change to the amenity and character of this view which would remain open and vegetated, and in which built form is already characteristic. The details of new planting could be agreed by condition.

1.5. Harm to Green Belt Purposes

1.5.1. TDC has undertaken a comprehensive Green Belt Assessment for the district. The Part 3 assessment assessed the Appeal Site in detail and concluded on pages 85 – 87:

1.5.2. *"...the impact of development could be reduced through buffers, landscaping and sensitive design, in particular it could be designed such that it conserves the setting of the Lingfield Conservation Area. Further, Town Hill which aligns the southern boundary and Station Road marking the eastern boundary provide robust and defensible boundaries, whilst making a positive contribution to settlement form in this location. As such this would limit the impact on the wider Green Belt's ability to continue to serve these purposes."*

1.5.3. *The assessment concludes “as a matter of planning judgement, that this site does justify the exceptional circumstances necessary to recommend amendment of the Green Belt boundary.”*

1.5.4. The Appellant’s Green Belt Assessment submitted as part of the application specific for the Proposed Development concludes that only limited harm to purpose 4 – Setting of Historic Towns would occur as a result of the scheme and that the strategic performance of the Green Belt would be unaffected (**Figure 10**). I agree with this conclusion.

2.0 Conclusions

2.1.1. I have considered carefully the landscape and visual and Green Belt evidence submitted by TDC and Rule 6 parties. From my review, I am of the opinion that TDC and Rule 6 parties have in my view:

- Failed to recognise that the Proposed Development has been shaped by a 'landscape led' response so that impacts can be successfully mitigated to acceptable levels and the most efficient use of the land is made.
- Failed to acknowledge fully the benefits of the Proposed Development, including the additional areas of POS and improvements to Footpath 381a, an important route between Lingfield Station and the town centre, opportunities TDC's own evidence base also identified.
- Incorrectly identified the Appeal Site as a 'valued landscape' under paragraph 174 of the NPPF. Whilst I recognise the Appeal Site has some qualities of value, principally in relation to heritage, this does not warrant it to be considered a 'valued landscape'.
- Even if the Inspector were minded to agree with TDC and the Rule 6 parties that the Appeal Site is a 'valued landscape', this does not preclude development from taking place within it.
- Overstated the visual prominence of the Appeal Site and the church spire of St Peter and St Pauls Church.
- Incorrectly overestimated the landscape and visual impacts of the Proposed Development which in my view, are limited to the immediate vicinity of the Appeal Site and would be no more than 'Moderate Adverse' at worst and would not be significant.
- Incorrectly applied the Green Belt purpose tests as set out in paragraph 138 of the NPPF to the Appeal Site such that the harm identified to the purposes is overestimated. I recognise there would be limited harm to purpose 4 which should be considered in the VSC balancing exercise.

- In consideration of that harm, failed to consider the strategic performance of wider Green Belt beyond the Appeal Site and how it can continue to function successfully with the Proposed Development.

2.1.2. Taking the evidence presented within my proof and other evidence provided by objectors, it is my view that policies CSP21 and Policy DP7 would not be breached as a result of the Proposed Development.