

# **Landscape Proof of Evidence**

## **Volume 1: Text**

Prepared by  
Elizabeth Bryant MA (Cantab) CMLI

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**

## Experience and Qualifications

My name is Elizabeth Bryant. I am a Chartered Landscape Architect and founder and director of Bryant Landscape Planning (BLP), a registered practice of the Landscape Institute which specialises in landscape and visual impact assessment. BLP works for a range of clients, including both volume and small house builders, logistics companies, hotels and entertainment venues, education establishments, residents' groups, major retailers and renewable energy providers.

I became a full Member of the Landscape Institute in 2007 and received Chartered Membership status in 2010. My qualifications include an MA in Landscape Architecture from Greenwich University and an MA Hons (Cantab) in the History of Art and Architecture from the University of Cambridge.

I have nearly 20 years' experience in the landscape profession, in which time I have carried out over 100 Landscape and Visual Impact Assessments, either as stand-alone assessments or as chapters for Environmental Statements. I have been called as an expert witness for planning appeals on multiple occasions, giving evidence on behalf of developers and of local community groups.

I sit as an assessor for my professional body, the Landscape Institute, assessing candidates' suitability to be accepted as chartered members of the Institute; I am also a mentor to candidates preparing to sit the chartership exam. I sit on the Richmond Design Review Panel and am an external critic for the MA Landscape Architecture and MA Landscape and Urbanism at Kingston University.

## Instruction

I was instructed by the Appellant in February 2022, as an independent landscape consultant, to advise on landscape and visual constraints in relation to a site south of Barrow Green Road, Oxted ('the Appeal Site'). I was then appointed in March 2023 to advise on emerging development proposals and to carry out a Landscape and Visual Impact Appraisal (LVIA) of the likely landscape and visual effects of residential development of the Appeal Site (Chapter 12 of the Environmental Statement<sup>1</sup>).

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<sup>1</sup> CD1.22.L

## Declaration of Professional Competence

I confirm that this Proof of Evidence has been prepared by me and that the evidence-based judgements within it have been prepared in accordance with guidance from my professional body, the Landscape Institute.

I confirm that in preparing this Proof of Evidence, I have assumed the same duty that would apply when providing an expert opinion in a court of law and that this duty has overridden any duty to those instructing me. I have complied with this duty by giving my opinion impartially and objectively, based on available evidence and my professional judgement.

I recognise that it is not my role as a landscape expert to act either as an advocate for or as an opponent of development proposals but solely to provide the decision maker with my objective and professional opinion on the scale and direction of any significant landscape or visual effects which could result from the implementation of the development proposals under consideration.

# Landscape Proof of Evidence

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## 1. PURPOSE, SCOPE AND STRUCTURE OF PROOF OF EVIDENCE

### Purpose of this Proof of Evidence

- 1.1. The purpose of my Proof of Evidence is to address landscape and visual matters in relation to the decision by Tandridge District Council (TDC) to refuse planning permission for residential development (the Appeal Scheme) of land south of Barrow Green Road, Oxted (the Appeal Site).
- 1.2. Landscape and visual matters are referenced in three Reasons for Refusal (RfR) of the Planning Decision<sup>2</sup> – RfR 2, RfR 3 and RfR 8.

*RfR 2 - The application site is sensitive being in the setting of the Surrey Hills National Landscape. The proposed development would adversely impact upon the character and distinctiveness of the landscape and countryside of the site and wider area and significantly detract from the overall character and appearance of the area and thereby the setting of the National Landscape. As such, the proposed development is contrary to the provisions of NPPF paragraph 189 and Core Strategy Policies CSP20 and CSP21 and Tandridge Local Plan Part 2: Detailed Policies (2014) policy DP7;*

*RfR 3 - The current proposal by Natural England to include the application site in the Surrey Hills National Landscape, based on advice of expert landscape consultants, has reached an advanced stage and is now a material planning consideration in the determination of this planning application. A grant of planning permission that would nullify this proposal would be unjustified. Planning permission should not be granted for development such as now proposed that would prejudice the outcome of the proposal to include the site in the National Landscape and damage an environmental asset contrary to Tandridge Local Plan Part 2: Detailed Policies (2014) policy DP7;*

and

*RfR 8 - The proposed development would have a major adverse effect for users of public bridleway 97 which would not just be limited to the loss of views of the National Landscape but the degradation and loss of experience of open countryside that is a valued landscape and an important recreational and well-being resource for local residents, contrary to policies 96(c) and 105 of the NPPF and Tandridge Local Plan Core Strategy policy CSP13.*

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<sup>2</sup> CD3.3

#### *TDC's position on landscape and visual matters*

1.3. In summary, TDC's case on landscape matters and the Appeal Scheme as set out in the Officer Delegated Report<sup>3</sup>, TDC's landscape consultation response<sup>4</sup> and Statement of Case (SOC)<sup>5</sup>, is that:

- the Appeal Site is a 'valued landscape' for the purposes of para 187 a) of the National Planning Policy Framework (NPPF);
- the Appeal Scheme would significantly detract from the character and appearance of the area, including the setting of the Surrey Hills National Landscape (SHNL);
- the Appeal Scheme would have a major adverse effect on Public Right of Way (PROW) Bridleway 97, which crosses the Appeal Site, and on residents' ability to enjoy the countryside; and
- the recommendation by National England (NE) to vary the boundary of the SHNL to include the Appeal Site is a material consideration.

#### *The Appellant's position on landscape and visual matters*

1.4. In summary, it is the Appellant's case that the Appeal Scheme would not '*significantly detract from the overall character and appearance of the area and thereby the setting of the National Landscape*' as stated in RfR 2, and that visual effects would be limited:

- the Appeal Site is not a 'valued landscape' for the purposes of para 187 a) of the NPPF;
- the Appeal Scheme would not significantly detract from the character and appearance of the SHNL; and
- visual effects would be limited.

#### *Scope of this Proof of Evidence*

1.5. Discussion with TDC on a Statement of Common Ground (SOCG) on landscape matters was initiated in November 2025.

1.6. Since no response has been received from TDC at the time of finalising this Proof of Evidence, having reviewed the Officer Report, TDC's SOC and the RfRs, I have identified the following main issues relating to landscape and visual impact as disputed between the Appellant and TDC and which I address in this Proof of Evidence:

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<sup>3</sup> CD3.1

<sup>4</sup> CD3.2M

<sup>5</sup> CD7.1

- In relation to the Appeal Site and its context:
  - whether the Appeal Site is a 'valued landscape' for the purposes of para 187a) of the NPPF;
  - the relationship of the Appeal Site with the SHNL;

and

- In relation to the predicted landscape and visual effects of the Appeal Scheme:
  - the effects of the Appeal Scheme on local landscape character, the SHNL and its setting;
  - the effects of the Appeal Scheme on PROW 97 and on access to public open space;
  - the implications of the SHNL Boundary Variation Project for the Appeal Scheme.

- 1.7. The Appeal Site is designated as Green Belt; although Green Belt is a spatial planning tool and not a designation intended to protect landscape character or the benefits it provides, my Proof of Evidence also provides an assessment of the potential effect of the Appeal Scheme on the openness of the Green Belt.
- 1.8. My Proof of Evidence should be read alongside those of others produced on behalf of the Appellant.
- 1.9. In preparing my Proof of Evidence, I reference the following core documents:

- CD1.22L – Environmental Statement (ES) Volume 2 Chapter 12: Landscape and Visual Impact Assessment (LVIA);
- CD.22.AG – ES Volume 3 Appendix H1: Supporting Figures;
- CD.22.AH – ES Volume 3 Appendix H2: Winter Baseline Photography;
- CD.22.AI – ES Volume 3 Appendix H3: Accurate Visualisations of the Proposed Development;
- CD.22.AK – ES Volume 3 Annex H1: Extract of Surrey landscape Character Assessment: Landscape Character Area Greensand Valley; Sub-Area GV4;
- CD.22.AL – ES Volume 3 Annex H2: Extract of Surrey Hills Area of Outstanding Natural Beauty (AONB) Landscape Assessment: LCA The North Downs Scarp and Holmesdale;
- CD3.2M -TDC Landscape consultation response (Rowellian Environmental Consulting Ltd);
- CD4.15 - TDC Landscape Capacity and Sensitivity Study (2016);
- CD8.1.C - Rule 6 Statement of Case - Appendix 3: LVIA prepared by Lousie Hooper CMLI;
- CD15.5 - Surrey Hills Boundary Review project: Appendix 1 Detailed Analysis of Method and Approach Responses;
- CD15.6 - Surrey Hills Boundary Review project: Appendix 2 Detailed Analysis of Desirability Responses; and
- CD15.7 - Surrey Hills AONB Boundary Variation Project Consultation Report June 2025: Appendix 16 Godstone Hills Analysis.

1.10. For ease of reference, CD.22.AH and CD.22.AI (Appendices H2 and H3 of the LVIA) are provided as appendices to this proof (Volume 2: Appendix EB2 and Volume 3: Appendix EB8 respectively).

### Structure of this Proof of Evidence

1.11. To address the above matters, my evidence is structured as follows:

- Summary of the key policy tests in relation to landscape and visual matters (Section 2);
- The Appeal Site and its context (Section 3);
- Assessment of whether the Appeal Site is a ‘valued’ landscape (Section 4);
- Review of the Appeal Site’s contribution to the SHNL and its setting (Section 5);
- The Appeal Scheme and embedded mitigation measures (Section 6);
- Effects of the Appeal Scheme on local landscape character and on the SHNL (Section 7);
- Effects of the Appeal Scheme on Public Right of Way (PROW) 97 and access to public open space (Section 8);
- Implication of the SHNL Boundary Variation Project for the Appeal Scheme (Section 9);
- Effects of the Appeal Scheme on Green Belt openness (Section 10); and
- Summary (Section 11).

## 2. PLANNING POLICY CONTEXT

2.1. The planning policy context is set out in detail in the planning statement<sup>6</sup> which accompanied the planning submission; below I summarise the key policy tests of relevance to landscape and visual matters. Detail on other planning matters, the overall planning balance and what weight should be given to any non-compliance with specific policies, is provided in the Proof of Evidence of Mr Brown<sup>7</sup>.

### National Policy

2.2. In relation to the Appeal Scheme and matters addressed in this Proof of Evidence, the following paragraphs of the current NPPF are of relevance:

- Para 96c) - planning policies and decisions should aim to achieve healthy, inclusive and safe places which enable and support healthy lives;
- Para 105 - planning policies and decisions should protect and enhance public rights of way and access;
- Para 135c) - developments should be sympathetic to local character and history, including the surrounding built environment and landscape setting;
- Para 136 - trees make an important contribution to character and quality and opportunities should be taken to incorporate them;
- Para 187a) - planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing 'valued landscapes' in a manner commensurate with their statutory status or identified quality in the development plan;
- Para 187b) - planning policies and decisions should recognise the intrinsic character and beauty of the countryside;
- Para 189 - great weight should be given to conserving and enhancing landscape and scenic beauty in protected landscapes and development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas;
- Para 190 - applications for major development within protected landscapes should be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.

2.3. In December 2025, a consultation draft of an updated NPPF was published. The draft NPPF contains National Decision-Making Policies; the following are of relevance to landscape and visual matters:

- DP3: Key principles for well-designed places – development proposals should respond to the history, character and features of the site and its setting, and should incorporate

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<sup>6</sup> CD1.3

<sup>7</sup> CD6.2

and/or connect to a network of high quality, accessible, multi-functional green infrastructure to provide opportunities for recreation and healthy living;

- TR8: Public rights of way – Development proposals should maintain public rights of way and take opportunities to extend, link or improve the quality of existing routes;
- N2: Improving the natural environment – development proposals should consider landscape character and the natural beauty of the countryside, conserve and enhance existing natural features;
- N3: Trees in new development - trees bring benefits to the character and quality of the built environment and opportunities should be taken to incorporate them and to ensure the long-term viability of retained trees; and
- N4: Protected Landscapes - substantial weight should be placed on the importance of conserving and enhancing their natural beauty, proposals for major development within them should only be supported in exceptional circumstances and development proposals within their setting should be sensitively located and designed to avoid or minimise adverse impacts on them.

2.4. The draft NPPF does not carry forward from the current NPPF the requirement to contribute to and enhance the natural and local environment by protecting and enhancing ‘valued landscapes’.

### Regional Policies

2.5. The Surrey Hills National Landscape Management Plan<sup>8</sup> provides policies to conserve and enhance the natural capital and benefits which the National Landscape (previously AONB) provides. Policies relevant to landscape and visual matters comprise:

- P1 - Great weight will be attached to any adverse impact that a development proposal would have on the amenity, landscape and scenic beauty of the National Landscape and the requirement to seek to further the purpose of conserving and enhancing the natural beauty of the National Landscape;
- P2 - Development must respect the special landscape character and nature of the locality, giving particular attention to potential impacts day and night on hillsides, ridgelines and relative tranquillity;
- P3 - Development proposals will be required to be of high-quality design, respecting any local distinctiveness and complementary in form, setting and scale with their surroundings and should take any opportunities to enhance their setting;

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<sup>8</sup> CD4.5

- P4 - Trees and woodlands are unlikely to be accepted as an argument for screening a development in its own right. Additional reasoning and justification which demonstrates that development will conserve and enhance the natural beauty of the National Landscape will be needed;
- P5 - Development that would fail to conserve and enhance the natural beauty of the NL will be resisted even when well screened;
- P11 - Development proposals will need to demonstrate through accordance with the guidance note published by the Institution of Lighting Professionals on the Reduction of Obtrusive Light, how light pollution affecting the darker skies, wildlife and habitats of the National Landscape will be avoided; and
- P13 - The impact of development outside the boundary of the SHNL that would adversely impact its setting by harming public views to or from it, or which would generate harmful additional traffic flows along its country lanes, should be considered.

### Local Policies

2.6. The following policies contained in TDC's Core Strategy 2008<sup>9</sup> and Local Plan Part 2: Detailed Policies 2014-2029<sup>10</sup> are referenced in TDC's Planning Decision as of relevance to landscape matters:

- *Policy CSP13 - Community, Sport and Recreation Facilities and Services;*
- *Policy CSP18 - Character and Design;*
- *Policy CSP20 - Areas of Outstanding Natural Beauty;*
- *Policy CSP21 - Landscape and Countryside; and*
- *Policy DP7 - General Policy for New Development.*

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<sup>9</sup> CD4.1

<sup>10</sup> CD4.2

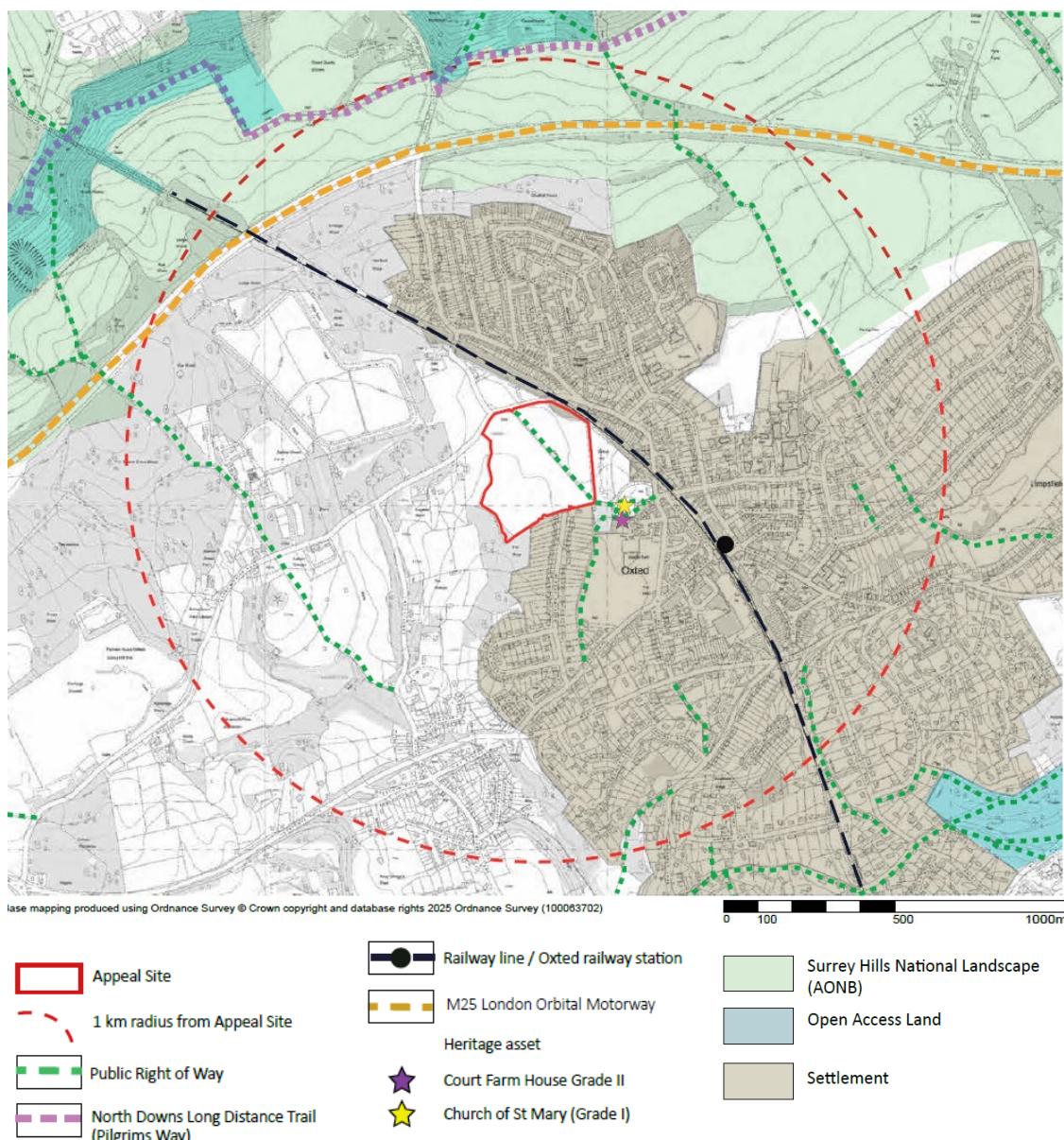
### 3. THE APPEAL SITE AND ITS CONTEXT

3.1. The Appeal Site and its context are described in detail in the planning submission documents. In this section, I summarise key features of relevance to landscape and visual matters.

#### The Appeal Site

3.2. The Appeal Site is a roughly rectangular parcel of land in agricultural use which lies adjacent to built-up areas of the settlement of Oxted (Plan 3.1 below).

3.3. It is bounded to the east by a railway line and Oxted burial ground; to the south by residential areas of Oxted; to the west by woodland and the grounds of a private property, Brookmead; and to the north by Barrow Green Road.



Plan 3.1: The Appeal Site and its context

3.4. Formal public access to the Appeal Site is limited to a bridleway, PROW 97, which crosses the Appeal Site, connecting the settlement to the south with Barrow Green Road to the north.

There is an informal pedestrian access from Wheeler Avenue on the southern boundary and undesignated footpaths around the perimeter of the Appeal Site, which appear well-used.

- 3.5. The Tree Survey (TS) of the trees within and immediately adjacent to the Appeal Site<sup>11</sup> confirms that, with the exception of a single mature ash tree (T16) which is subject to a Tree Protection Order (TPO), all surveyed trees, areas of woodland and hedgerows are either on or adjacent to the boundaries. Six of the individual trees and two of the groups of trees on the boundaries are also subject to TPOs.
- 3.6. The TS categorises six individual trees and two areas of woodland as Category 'A' i.e. they are high quality and their retention should be prioritised. The majority of the remaining surveyed trees are Category 'B' i.e. they are of moderate quality and their retention is desirable.
- 3.7. The woodland in the southwestern corner of the Appeal Site is part of wider wet woodland known as 'The Bogs'; areas of The Bogs beyond the Appeal Site boundary are designated as Ancient Woodland. The Bogs as a whole is identified as a Potential Site of Nature Conservation Importance (pSNCI).
- 3.8. The Appeal Site falls gently from approximately 105m Above Ordnance Datum (AOD) at the eastern boundary to approximately 95m AOD at the western boundary, towards The Bogs woodland area. An embankment rises to the railway line on the north-eastern boundary, beyond which is residential development.

#### Landscape and townscape context of the Appeal Site

- 3.9. An appraisal of the Appeal Site's landscape context, including a review of relevant published national and regional landscape character assessments, informed the landscape baseline appraisal in the LVIA<sup>12</sup>.
- 3.10. At a national level, the Appeal Site falls within National Character Area (NCA) Profile: 120 Wealden Greensand, a long narrow belt of Greensand, typified by scarp-and-dip slope topography. There are extensive areas of ancient woodland of hazel, oak and birch with some sweet chestnut; fields are identified to be small or medium, in irregular patterns, with boundaries formed by hedgerows and shaws, and the settlement pattern is described as a mixture of dispersed farmsteads, hamlets and some nucleated villages, with large houses within extensive parks and gardens found throughout the area.
- 3.11. At a regional level, the Surrey Landscape Character Assessment (SLCA) locates the Appeal Site within Landscape Character Area (LCA) Greensand Valley<sup>13</sup>, characterised as a '*moderately flat*

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<sup>11</sup> CD2.2

<sup>12</sup> CD1.22.L; paras 12.4.23-12.4.43

<sup>13</sup> CD1.22.AK

*or gently undulating farmland enclosed by the North Downs scarp to the north and the hills of the greensand ridge to the south’.*

- 3.12. LCA Greensand Valley is divided into sub-areas; the Appeal Site is located within Sub-area GV4, described in the SLCA as a ‘*semi-enclosed area with rural views to the open pastoral valley sides, the North Downs scarp and the wooded slopes of the greensand hills, with east west transport links running parallel with the scarp to the north.*’ The Appeal Site shares many of the characteristics of GV4.
- 3.13. To the north of the Appeal Site, the land rises gently towards the M25 London Orbital Motorway (the M25), beyond which it rises steeply to form the chalk scarp of the SHNL. Due to its proximity to the SHNL, whose closest boundary is approximately 500 metres (m) to the northeast, it is agreed between all parties that the Appeal Site lies within the setting of the NL.
- 3.14. The Surrey Hills Character Assessment identifies the area of the NL to the north of the Appeal Site as North Downs Scarp and Holmesdale; detail is provided at section 5 of this Proof of Evidence.
- 3.15. Residential areas of Oxted extend from the centre to north of the Appeal Site, with properties generally two storeys in height, detached or semi-detached and with pitched roofs, exemplified by residential areas of the settlement immediately to the south of the Appeal Site, centred on Wheeler Avenue, and to the north of the Appeal Site, beyond the railway line.
- 3.16. The Church of St Mary the Virgin (Grade I) lies approximately 100m to the southeast of the Appeal Site. Master Park, which provides sporting and play facilities, is approximately 125m to the south.

#### *Landscape value of landscape receptors*

- 3.17. The landscape value of sub-area GV4 is assessed as medium, reflecting its proximity to the NL and that it is a landscape in generally good condition, with moderate importance and scenic quality and limited potential for substitution.
- 3.18. The landscape value of the SHNL is assessed as high, reflecting its status as a landscape designated for its natural beauty.

#### *Visibility of the Appeal Site*

- 3.19. Due to intervening visual barriers such as built form, trees and the railway corridor, many views from the wider area towards the Appeal Site are effectively obstructed and/or partially screened, even during winter months.

3.20. To illustrate the existing visibility of the Appeal Site, winter photography of the existing view taken from a series of representative viewpoints towards the Appeal Site were provided in the LVIA (**Appendix EB2**).

3.21. Local views across and into the Appeal Site are possible from PROW 97<sup>14</sup> and from the burial ground<sup>15</sup>. There are glimpsed views into the Appeal Site above the hedgerow and through the access from the stretches of Barrow Green Road which pass it<sup>16</sup> and travelling south on Chalkpit Lane, approaching the junction with Barrow Green Road<sup>17</sup>. In these views, there are glimpses of St Mary's church tower and of 20<sup>th</sup> century built form associated with the settlement, beyond intervening tree cover. From Wheeler Avenue there are glimpsed views of the Appeal Site beyond the boundary vegetation<sup>18</sup>. There are assumed to be views of the Appeal Site from windows and gardens of some of the properties closest to it, although it should be emphasised that for residents, there is no right to a view from private properties.

3.22. From other locations within Oxted, such as Master Park, the Appeal Site is indiscernible<sup>19</sup>.

3.23. In longer views, the Appeal Site is discernible in the wide, panoramic views from elevated locations on the scarp to the north; where the Appeal Site is visible in these views, built form associated with the settlement of Oxted and the M25 are also present<sup>20</sup>.

3.24. In these long views looking south towards the settlement from elevated locations in the NL, mature tree cover is a feature, wrapping around the edges and present throughout the settlement, softening views of built form and transport infrastructure and integrating the town into the landscape.

*Value of visual receptors' views*

3.25. Of the groups of potential visual receptors identified in the LVIA, users of public footpaths, including within the NL, were assessed as being of high sensitivity.

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<sup>14</sup> Appendix EB2; Views 1, 2, 3 and 4

<sup>15</sup> Appendix EB2; View 7

<sup>16</sup> Appendix EB2; Views 11 and 12

<sup>17</sup> Appendix EB2; View 13

<sup>18</sup> Appendix EB2; View 14

<sup>19</sup> Appendix EB2; Views 9, 10, 15 and 16

<sup>20</sup> Appendix EB2; Views 5 and 6

#### 4. WHETHER THE APPEAL SITE IS A 'VALUED LANDSCAPE'

4.1. An area of disagreement between parties is whether the Appeal Site displays sufficient characteristics and qualities to qualify as a 'valued landscape' under the meaning intended of para 187a) of the 2024 NPPF. Under para 187a), 'valued landscapes' should be protected and enhanced *'in a manner commensurate with their statutory status or identified quality in the development plan'*.

4.2. My conclusion in the LVIA<sup>21</sup> was that the Appeal Site does not display sufficient features or characteristics to be considered a 'valued landscape'.

4.3. This conclusion was informed by the initial appraisal work which I conducted for the Appellant in March 2022 providing informal advice on landscape and visual constraints associated with the Appeal Site. The initial appraisal was based on desk research - reviewing relevant policies, designations, and published assessments - and field visits to appraise the Appeal Site's characteristics and context.

4.4. Factors which I considered in my desk-top appraisal included:

- Landscape designations;
- The TDC Evidence Base and whether the Appeal Site was identified in the development plan; and
- The non-inclusion of the Appeal Site in the initial proposed SHNL boundary variation by NE

4.5. In reaching my conclusion, I was also mindful that whilst a landscape may be popular and valued by a local community, that is not sufficient for it to be considered a 'valued landscape' and that for a site to be a valued landscape, it must have some demonstrable physical attribute rather than just popularity. I was also mindful that areas which fall within the setting of a NL or National Park should not, solely by virtue of this, be considered as 'valued landscape'. Extensive areas of land fall within the setting of NLs and National Parks and, from many of these areas, the Protected Landscape can be seen, however this alone is not sufficient for all such areas to be considered as 'valued landscape'.

4.6. It is also important to note that Landscape Institute guidance on assessing landscape value outside designated areas<sup>22</sup> does not provide absolute benchmarks or scores to be attained; whether a site meets the criteria for being a 'valued' landscape in NPPF terms – rather than a landscape with value – is a matter of professional opinion.

4.7. The specific evidence on which I based my conclusion that the Appeal Site is not a 'valued landscape' under the meaning intended of para 187a) of the NPPF is summarised below.

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<sup>21</sup> CD1.22.L; para 12.4.17

<sup>22</sup> CD15.3

## Landscape Designations

4.8. Existing landscape designations are one - although not the only – indicator that a site is of higher landscape value.

### *National designations*

4.9. The Appeal Site is not subject to a designation which would denote landscape value at the national level – for example, inclusion within the boundary of a National Park or National Landscape – and does not currently form part of the SHNL.

4.10. In 2021, NE launched the Surrey Hills Boundary Variation Project. The Appeal Site was not initially assessed as meeting the beauty criteria for inclusion within the NL and did not fall within any of the proposed boundary extension areas published in 2023 by NE. (Subsequently, following Statutory and public consultation in 2023, the Appeal Site and The Bogs were recommended for inclusion in the boundary variation project; further detail of the SHNL Boundary Variation Project and the Appeal Site is provided at Section 9 of this proof.)

4.11. The exclusion of the Appeal Site from the initial proposed boundary extensions and the fact that it was not identified at that time as being of sufficient quality to meet NE's criteria for natural beauty were additional factors which I took into account when appraising whether it met the bar to be considered a 'valued landscape'.

### *Regional designations*

4.12. Locally designated landscapes are also normally considered to be valued landscapes, in line with the hierarchical approach to landscape protection in the NPPF – i.e. that they should be protected '*in a manner commensurate with their statutory status or identified quality in the development plan*'.

4.13. Many regional and local authorities do not have local landscape designations, however, at the regional level, Surrey designates areas as Areas of Great Landscape Value (AGLV) - a designation intended to protect and conserve areas of landscape assessed as having inherent landscape and visual qualities.

4.14. TDC state that the AGLV designation is '*important in its own right*'<sup>23</sup> and that AGLVs function as buffers to protect the integrity of the NL, noting also that many views from the NL are into areas of AGLV. AGLVs are given commensurate protection in TDC Policy CSP 20.

4.15. Neither the Appeal Site, nor its immediate context, are – or have ever been - covered by the AGLV designation, which wraps around the eastern extent of Oxted. The Appeal Site's

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<sup>23</sup> CD4.1; para 17.4

exclusion from the AGLV designation means that it is not specifically identified for its quality in the current TDC development plan.

4.16. As context, AGLVS were originally designated in Surrey in 1953 (approved in 1958) and have been the subject of periodic reviews - in 1971, in 1981, and, most recently, in 2007. However, in none of these reviews was the Appeal Site identified for inclusion within the AGLV designation.

#### TDC Evidence Base

4.17. Studies such as landscape capacity and sensitivity studies prepared by local authorities as part of the evidence base for their development planning/plan making process can provide useful analysis of a site and inform judgements on its value.

4.18. TDC have prepared such a study – the 2016 Tandridge Landscape Capacity and Sensitivity Study<sup>24</sup> - which assesses potential development sites across the district. Four sites are adjacent to Oxted's northern boundary, one of which is the Appeal Site (ref. OXT007).

4.19. The TDC Study assesses the landscape value of the potential development sites, scoring each site 1-5 against seven criteria. Each site's numeric score is then summarised on a three-tier scale – high value, moderate value or low value.

4.20. The TDC Study concludes that the Appeal Site scores 16 - out of a maximum of 35 – against the seven criteria and is therefore of moderate value and has medium landscape capacity for housing development<sup>25</sup>. This is the lowest score of the four North Oxted sites, which score 19 (OXT006), 18 (OXT034) and 21 (OXT035) respectively.

4.21. The TDC Study does not identify the Appeal Site as a valued landscape.

#### Conclusion on whether the Appeal Site can be considered a 'valued landscape'

4.22. Taking account of the factors above, I concluded that although the Appeal Site has some strong landscape qualities, these were not exceptional or substantial and would not elevate it beyond mere countryside, and that the Appeal Site did not therefore meet the threshold of a 'valued' landscape as intended by para 187a) of the NPPF.

#### The Appeal Site's value

4.23. It is important to note that this conclusion does **not** mean that I assess the Appeal Site as being of low – or having no - landscape value.

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<sup>24</sup> CD4.15

<sup>25</sup> CD1.22.AM

4.24. Applying the Landscape Institute criteria for assessing landscape value, I concluded that the Appeal Site is of medium landscape value<sup>26</sup>. This aligns with the 'score' in the TDC Study, albeit that I did not assign numeric scores.

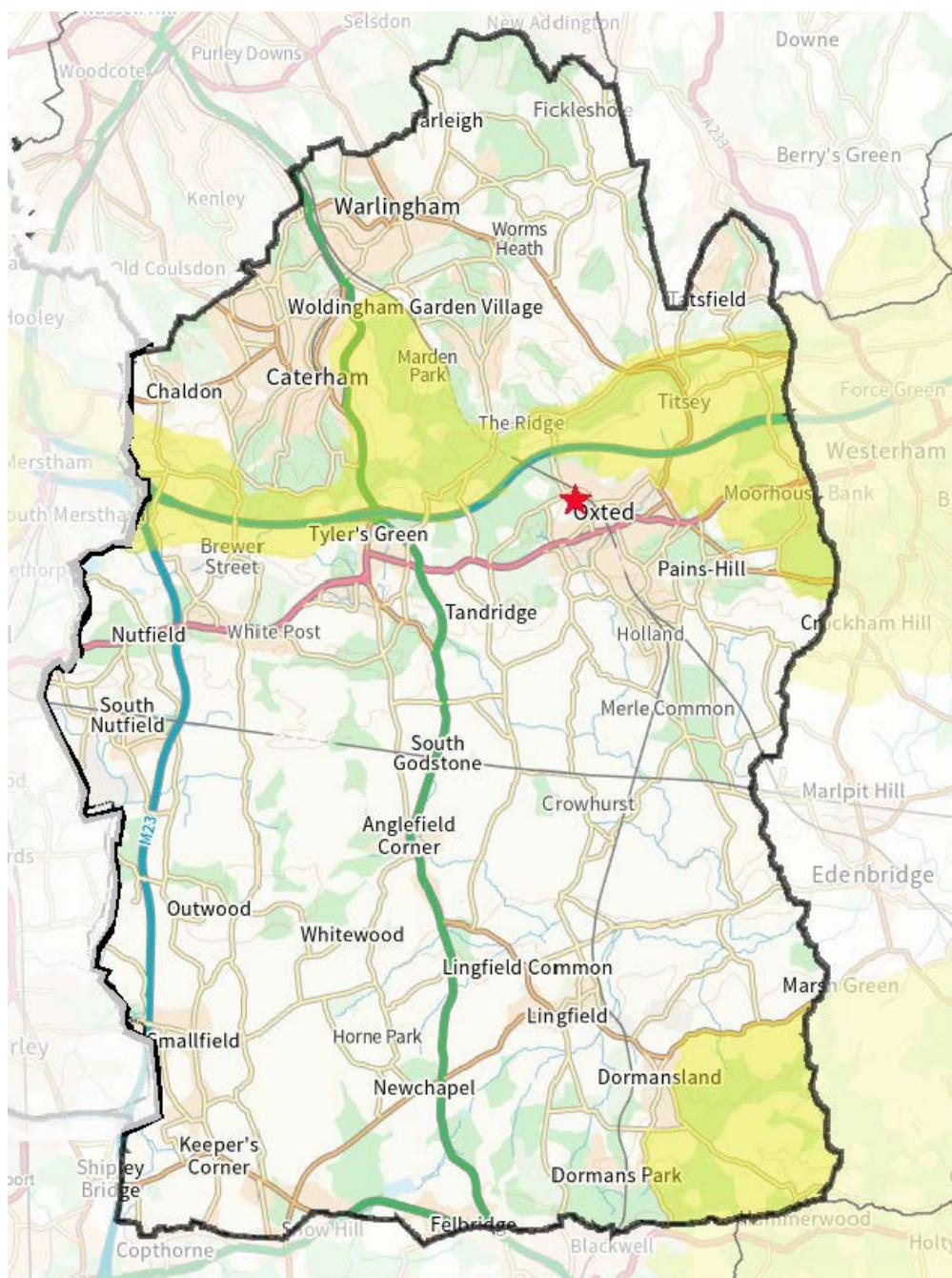
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<sup>26</sup> CD1.22.L; Table 12.11

## 5. THE APPEAL SITE AND THE SURREY HILLS NATIONAL LANDSCAPE

5.1. The SHNL designation covers one quarter of the land in Surrey and a swathe of land in the north of Tandridge district (**Plan 5.1**).

5.2. The High Weald NL designation covers the south-eastern corner of the district.



Plan 5.1: Extent of National Landscape in TDC

5.3. The Appeal Site is not currently covered by the NL designation, however, the closest boundary of the SHNL is approximately 500m to the northeast. Settings of NLs are not defined geographically but broadly comprise areas beyond the NL from which the NL can be experienced and/or which influence the character and scenic quality within the NL (either positively or negatively).

5.4. All parties agree that the Appeal Site forms part of the setting of the NL.

5.5. The Surrey Hills Character Assessment identifies local landscape character areas in the NL. The area of the NL closest to the Site is identified as The North Downs Scarp and Holmesdale<sup>27</sup>, described as:

*'A prominent scarp slope of the North Downs ... a dramatic and dominant feature overlooking the farmed landscape of the Holmesdale Valley and wooded Greensand Hills to the south. The scarp comprises a rich mosaic of pasture, ploughed land, downland, woodland and scrub.'*

5.6. The scarp provides an attractive backdrop to Oxted, prominent in views from multiple locations throughout the town, including from within the Appeal Site, where there are attractive, open views northwards from PROW 97.

5.7. In terms of intervisibility, the Appeal Site is in turn discernible in the wide, panoramic views available from footpaths and Open Access Land within the NL<sup>28</sup>. In these views from the NL, the area in which the Appeal Site is located is influenced by the presence of the settlement of Oxted and the M25.

5.8. The Appeal Site's visual relationship with the SHNL is recognised in the TDC Sensitivity Study which assessed the visual sensitivity of the Appeal Site as being substantial, due to its intervisibility with the NL<sup>29</sup>.

5.9. However, I conclude that, notwithstanding its proximity, the Appeal Site does not make a significant contribution to the experience of the landscape and scenic beauty of the NL in views from it, nor to the landscape or scenic qualities of the NL itself, and that the visual influence of the Appeal Site on the NL is low.

### Special qualities of the SHNL

5.10. The SHNL Management Plan<sup>30</sup> identifies special qualities and key landscape features which define the natural beauty of the NL, which comprise:

- Hills & views;
- Woodland;
- Heathland;
- Commons;
- Chalk downland;
- Water: Rivers & ponds;
- Agricultural Land;

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<sup>27</sup> CD15.4

<sup>28</sup> Appendix EB2; views 5 and 6

<sup>29</sup> CD1.22.AM

<sup>30</sup> CD4.5

- Boundary features;
- Parkland & historic landscape features;
- Routeways: Country Lanes & Rights of Way;
- Settlements & the built heritage; and
- Tranquillity & Dark Skies

5.11. Since some of the special qualities are experiential and can have influence beyond the boundary of the protected landscape, although the Appeal Site is not located within the NL, it is relevant to consider to what extent the Appeal Site currently enhances or contributes to these special qualities.

5.12. I consider that the special qualities to which the Appeal Site could contribute are Hills & Views, and Tranquillity & Dark Skies. Below I consider what contribution the Appeal Site currently make to these two experiential special qualities.

*Hills and views*

5.13. As previously noted in section 3 of this proof, panoramic views are possible from many vantage points throughout the NL, including from the chalk scarp to the north of the Appeal Site. In views from the scarp, for example from the North Downs Way, the Appeal Site is often discernible and forms part of the rural scene at the settlement edge. However, it is my assessment that the contribution which the Appeal Site makes to these wider views is minimal.

*Tranquillity and dark skies*

5.14. Many areas of the NL retain a feeling of remoteness, isolation and tranquillity, including dark skies at night. However, the peace and tranquillity can be eroded by air traffic and by motor vehicles. Increases in light pollution from new development can also threaten the dark skies.

5.15. Although there are no light sources within the Appeal Site itself, due to its location, it experiences a moderate level of light pollution from the settlement, as illustrated by CPRE's Light Pollution and Dark Skies map (**Appendix EB3**).

5.16. Due to its undeveloped condition and its location adjoining the settlement boundary, it is my conclusion that the Appeal Site currently neither contributes to nor damages the tranquillity of the NL or the dark skies.

*Summary of contribution of the Appeal Site to the SHNL*

5.17. In summary, I find that the Appeal Site has a visual relationship with the SHNL, however, whilst the Appeal Site does not contribute negatively to the setting of the NL, neither does it make a significant, quantifiable positive contribution.

## 6. THE APPEAL SCHEME AND EMBEDDED MITIGATION

- 6.1. The Appeal Scheme is described in the material submitted with the planning application, but in summary, it is a landscape-led design response which considers the landscape opportunities and constraints of the Appeal Site.
- 6.2. Although the Appeal Scheme is in outline, the submission was accompanied by an illustrative landscape masterplan<sup>31</sup>, reproduced for convenience at **Appendix EB4**, which demonstrates how the proposed built form could be accommodated within the Appeal Site.
- 6.3. The development of the layout was an iterative process, informed – amongst many factors - by the landscape and visual analysis work which I carried out and by responses from consultees.
- 6.4. Key principles of the proposals which were informed by landscape and visual considerations comprise:
  - Maximum heights of two and a half storeys to minimise the locations from which the proposed built form would be intrusive in views – for example from Master Park to the south;
  - Set built form back from Barrow Green Road to accommodate structural landscape on the northern boundary, which, on reaching maturity, would replicate the character of the existing settlement edges, for example on the southern boundary of the Appeal Site or the northern edge of residential areas north of the railway line;
  - Retain informal footpaths around the Appeal Site boundary;
  - No diversion of PROW 97;
  - Locate TPO ash tree (T16) within a public open space;
  - Provide enhanced native planting on western boundary to enhance screening from Brookmead;
  - Provide substantial landscape buffers to The Bogs and other areas of woodland, including Ancient Woodland, on the boundaries; and
  - Minimise removal of mature hedgerow to a stretch on the boundary with Barrow Green Road to create the proposed access.
- 6.5. The landscape strategy has been informed by the local landscape context. Extensive tree planting is proposed, creating new green boundaries and augmenting the existing planting. The planting palette would comprise predominantly native species appropriate to the local landscape context.

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<sup>31</sup> CD2.11

- 6.6. Tree planting is proposed within the landscape buffers and areas of public open space, significantly increasing tree cover within the Appeal Site and supplementing the existing tree and woodland cover on the boundaries.
- 6.7. The layout provides many opportunities for mitigation in the form of planting which would be an integral part of the development, softening views, providing habitat and enriching the visual quality of the Appeal Site margins.

## 7. EFFECTS OF THE APPEAL SCHEME ON LANDSCAPE CHARACTER AND ON THE SHNL

7.1. In considering the landscape effects which could follow implementation of the Appeal Scheme, I address:

- *direct landscape effects*, i.e. effects on the fabric of the Appeal Site itself and on landscape features associated with it; and
- *indirect landscape effects*, i.e. changes to characteristics and landscape character beyond the boundary of the Appeal Site, including on the SHNL.

7.2. The assessment of effects was informed by sixteen accurate visualisations of the Appeal Scheme (**Appendix EB8**), based on the illustrative landscape masterplan. These demonstrate, for a range of publicly accessible locations, whether the Appeal Scheme would be visible, and, when visible, the extent and appearance of the Appeal Scheme in the view.

7.3. Three additional viewpoints to the viewpoint locations proposed by the Appellant during pre-application consultation were prepared - an additional view from PROW 97 (VP4 - requested by TDC in the formal scoping opinion<sup>32</sup>) and two additional views from Master Park (VP15 and VP16 - requested by Historic England<sup>33</sup>).

### Direct effects on the Appeal Site

7.4. In the LVIA, I concluded that there would be major adverse effects following completion of the Appeal Scheme on the Appeal Site itself<sup>34</sup>. This is due to the introduction of built form to undeveloped land, which would permanently change the character of the Appeal Site.

7.5. As is typically the case when introducing built form and associated infrastructure to a greenfield site, the proposed planting, even when mature, would not mitigate the adverse landscape effects of the Appeal Scheme on the Appeal Site.

7.6. The assessment of adverse effects is therefore due to the consequent permanent change to the structure and pattern of the existing landscape which would follow the introduction of built form.

7.7. The landscape features identified in the LVIA as being of value which could experience change and direct effects as a result of the Appeal Scheme are the trees, woodland and hedgerows associated with the Appeal Site, including The Bogs.

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<sup>32</sup> CD1.22.L; table 12.9

<sup>33</sup> CD6.7; para 2.10

<sup>34</sup> CD1.22.L; para12.6.10

- 7.8. The Appeal Scheme includes generous landscaped buffers to ensure that no built form or infrastructure is located within the root protection areas or canopies of the trees and woodland on the boundaries. This should also ensure that there is no pressure from future residents to reduce canopies. T16 – the TPO ash tree within the Appeal Site - is located within an area of public open space.
- 7.9. These embedded design features ensure the long-term viability and health of the trees, woodland and hedgerows.
- 7.10. The technical assessments provided in Mr Cafferkey's Proof of Evidence<sup>35</sup> addressing hydrology matters, Mr Jaques' Proof of Evidence<sup>36</sup> addressing drainage matters and Ms Tamblyn's Proof of Evidence<sup>37</sup> addressing ecology matters all conclude that the Appeal Scheme would not result in adverse effects on the wet woodland in The Bogs.
- 7.11. In the LVIA, I predicted that the magnitude of change which the trees, woodland and hedgerows would experience would be negligible<sup>38</sup>; they would therefore experience minor neutral effects following implementation of the Appeal Scheme. I assessed the effects as neutral rather than adverse because the changes within the Appeal Site would have an indiscernible effect on their health and long-term viability.

#### Effects of the Appeal Scheme on landscape character

- 7.12. Acknowledging the adverse landscape effects on the Appeal Site which would result from implementation of the Appeal Scheme, the key issue is to assess to what extent the changed character of the Appeal Site would impact the character of the wider area, including of the SNHL.
- 7.13. The significance of residual effects on the character of LCA G4 is predicted to be minor and adverse<sup>39</sup>. The direction of effects is predicted to be adverse due to the de facto reduction in area of LCA G4 which would follow the removal from the LCA of the Appeal Site. However, the Appeal Scheme would not be uncharacteristic of the receiving townscape to the north and south and the new settlement edge would replicate the character of the existing edge i.e. glimpses of built form, encompassed by trees.
- 7.14. TDC's SOC<sup>40</sup> claims that the Appeal Scheme would be seen as '*an isolated residential development in open countryside*' with the resultant urbanisation having a major adverse effect

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<sup>35</sup> CD6.8

<sup>36</sup> CD6.4

<sup>37</sup> CD6.6

<sup>38</sup> CD1.22.L; para 12.6.11

<sup>39</sup> CD1.22.L; para 12.6.12

<sup>40</sup> CD7.1; para 20.3

on the character and appearance of the wider open countryside. This is not a conclusion supported by any evidence.

- 7.15. There would be a perception of built form within the Appeal Site from Barrow Green Road and Chalkpit Lane, however by Year 15, these views would soften as the proposed structural planting matures (**Appendix EB8; VP11-13**).
- 7.16. The Appeal Scheme would extend the settlement, creating a new settlement edge along Barrow Green Road. NE comment that the existing settlement edge in this location <the Appeal Site's southern boundary> '*does not exert a significant influence*<sup>41</sup>' on the qualities of the land adjacent to it and it is my conclusion that a new settlement edge on Barrow Green Road would replicate the existing relationship between settlement and countryside and would also not exert significant influence on land to the north.
- 7.17. I conclude that, given its location and context, the level of harm to the surrounding landscape which would result from the Appeal Scheme would be limited and less than significant, with effects on landscape character beyond the Appeal Site reducing rapidly with distance.

#### Effects of the Appeal Scheme on the SHNL and its setting

- 7.18. All parties agree on the importance of the SHNL as a landscape afforded the highest protection and that the Appeal Site's proximity to the NL means that development of it could result in effects on the NL and on its setting. Although development beyond the boundary of the NL would not impact the physical fabric of the designated landscape itself, there is potential for development in its setting to affect its perceptual qualities or the experience of it by, for example, affecting views from within the NL or views towards it.
- 7.19. However, as described in Section 5, whilst the Appeal Site is located relatively close to the boundary of the SHNL, it does not currently make an important contribution to the experience of the landscape or to its scenic qualities and the visual influence of the Appeal Site on the SHNL is not significant.
- 7.20. There still remains the potential however for development of the Appeal Site to impact adversely on the SHNL by undermining the designated landscape's purposes.

#### Impacts on views and intervisibility with the SHNL

##### *Views towards the Appeal Site*

- 7.21. Whilst the Appeal Scheme would not result in any direct changes to the fabric of the SHNL, elements of the Appeal Scheme such as rooves and landscaped areas would be discernible in

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<sup>41</sup> CD15.7; page 7

views from elevated locations within the SHNL looking south, as demonstrated in the visualisations of the Appeal Scheme (**Appendix EB8; VP5-6**).

- 7.22. These glimpses of built form within the Appeal Scheme would be within wide panoramic views which, as described at 3.23, contain built form and tree cover associated with the settlement of Oxted and the M25. The visualisations demonstrate how the Appeal Scheme would be an element in these views, but would not change their structure, integrating with neighbouring developed areas and being incorporated into the existing landscape and townscape.
- 7.23. Whilst there would be some change in views from the SHNL, it is my assessment that the magnitude of change would be negligible i.e. *the proposed development would result in a minor variation in the views and the change would affect a small proportion of the views*<sup>42</sup>.
- 7.24. Therefore, notwithstanding the acknowledged high sensitivity of the visual receptors, the significance of residual effects on visual receptors within the SHNL would be negligible, demonstrating that change does not automatically equate to unacceptable harm.

#### *Views towards the SHNL*

- 7.25. It is agreed between parties that views from PROW 97 as it crosses the Appeal Site would be adversely affected by the introduction of built form to the Appeal Site, noting that there would still be publicly accessible views towards the scarp from other locations within the Appeal Site, such as from the proposed extensive areas of public open space within the Appeal Scheme.
- 7.26. From locations in Oxted beyond the Appeal Site, the Appeal Scheme would not be present in views looking north, for example from Master Park, and the scarp would still sit prominently on the skyline (**Appendix EB8; VP10-11 & VP15-16**).
- 7.27. The scarp would continue to provide an attractive backdrop to the settlement, including for future residents of the Appeal Scheme.

#### *Impacts on dark skies and tranquillity*

- 7.28. In relation to potential impact on the dark skies, the specification of the lighting would be subject to planning conditions to ensure that the lighting strategy minimises light spill from the Appeal Scheme.
- 7.29. The technical note prepared by MMA Lighting Consultancy (**Appendix EB6**) illustrates how a lighting strategy could be designed to minimise light spill and comply with SHNL Policy P11 by meeting the requirements of the Institution of Lighting Professionals guidance note on the Reduction of Obtrusive Light.

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<sup>42</sup> CD1.22.L; Table 12.7

## Impacts on other special qualities of the SHNL

7.30. The Appeal Scheme would not impact on any ridgelines and, due to intervening distance, would not impact on the tranquillity of the NL.

## Conclusion on effect of the Appeal Scheme on the SHNL

7.31. Whilst the sensitivity of the SHNL is agreed by all parties to be high, the predicted change (impact) on the designated landscape derives from changes in views from within it and changes in public views towards it from a limited area (the Appeal Site).

7.32. The Appeal Scheme would not harm the landscape character, scenic quality or defined special qualities of the SHNL. Likewise, whilst the Appeal Scheme would permanently change the character of the Appeal Site, which forms part of the setting of the NL, these changes would not have a harmful effect on the character, scenic quality or special qualities of the NL itself which would be preserved and would not result in '*significant adverse impact on the setting of the NL*' as claimed by TDC in their SOC<sup>43</sup>.

7.33. The Appeal Scheme would not impact on any ridgelines, would not impact on the tranquillity of the NL or on dark skies and would not harm views from within the NL.

7.34. In summary, it is concluded that changes to some existing views towards the NL from a limited area (the Appeal Site) and negligible changes in views towards the Appeal Site from within the NL do not equate to a level of harm which could be categorised as spoiling the setting of the NL and that the changes in these views should not be given great weight. I assess these changes as representing a negligible impact on the SHNL, resulting in a negligible significance of effect on it.

## Visual effects of the Appeal Scheme

7.35. The LVIA provides an assessment of the likely effects on visual receptors beyond the SHNL<sup>44</sup>.

7.36. In summary, the conclusion of the LVIA was that, on completion, views towards the Appeal Site from some locations in the vicinity would change, resulting in adverse visual effects for some local visual receptors (in each case due to proximity to the Appeal Site). The visual receptors predicted to experience significant effects on their visual amenity comprise:

- Users of PROW 97 – major adverse; and
- Visitors to Oxted burial ground – moderate adverse, reducing to minor adverse at Year 15.

7.37. For completeness, acknowledging that residents can be sensitive to changes in views, effects were also assessed on views from properties on Wheeler Avenue and were predicted to be

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<sup>43</sup> CD7.1; para 11.2

<sup>44</sup> CD1.22.L; Table 12.16

moderate adverse. However, it should be noted that there is no right to a view from a private property in planning terms.

- 7.38. From the wider area, views of the Appeal Scheme would be screened by intervening visual barriers. The predicted effects on views from the SHNL is addressed above at 7.21-7.24.
- 7.39. The R6 objection to the application states that '*the development would be highly visible*'<sup>45</sup> and that '*the proposed development will be clearly visible from multiple public and private viewpoints*'<sup>46</sup> (although, as noted previously, there is no right to a view from a private viewpoint).
- 7.40. The claim by the R6 that the Appeal Scheme would be '*highly visible*' from '*multiple viewpoints*' is not supported by the Zone of Theoretical Visibility (ZTV) prepared on their behalf by LHLA<sup>47</sup> (**Appendix EB7**).
- 7.41. The R6 ZTV demonstrates a limited zone of visibility for the Appeal Scheme, a conclusion with which I agree and which aligns with the assessment of visual effects in the submitted LVIA.

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<sup>45</sup> CD8.1A; para 50

<sup>46</sup> CD8.1A; para 93

<sup>47</sup> CD8.1C; figure 47

## 8. EFFECTS OF THE APPEAL SCHEME ON PROW 97 AND ACCESS TO PUBLIC OPEN SPACE

- 8.1. For users of PROW 97, which crosses the Appeal Site, the LVIA predicts that effects on their visual amenity would be major and adverse.
- 8.2. TDC's SOC<sup>48</sup> states that the adverse effects the Appeal Scheme would have on users of PROW 97 would not be limited to the loss of views of the NL but would include the loss of experience of open countryside and the health and well-being benefits which the bridleway provides for residents.
- 8.3. It is relevant to emphasise that the Appeal Site is **not** public open space or Open Access Land and that official public access to it is limited to PROW 97. Whilst unofficial access is possible around the perimeter of the Appeal Site via informal paths, which were the subject of a rights of way application submitted to Surrey County Council in 2022 (no. CP612), at the time of preparing this proof, the footpaths have not been designated.
- 8.4. In terms of public open space, residents have access to Master Park, 100m to the south of the Appeal Site - described in TDC's SOC as '*a significant open space close to the centre of Oxted town*'<sup>49</sup>, providing approximately 3.5ha of open space, with sports pitches, tennis courts, play facilities etc - and to the extensive areas of Open Access Land in the NL to the north. Although further from the settlement, they are well-served by a network of footpaths.
- 8.5. I do acknowledge that, notwithstanding the views of the scarp which are afforded from Master Park, visitors to it do not have the same appreciation of the countryside as they do from the footpaths in the Appeal Site.
- 8.6. However, the Appeal Scheme does not require that PROW 97 is blocked or diverted and the informal footpaths around the perimeter of the Appeal Site would be formalised and permanently protected.
- 8.7. It is agreed that the experience would change for users of the bridleway, and that the visual amenity for users would change, with views of the development replacing current views across an open field towards the scarp, resulting in major adverse effects on views; adverse effects which would not reduce when the proposed planting reaches maturity,
- 8.8. However, in relation to wider amenity provision for the community, the Appeal Scheme would provide new areas of open space, including both formal and informal play areas. There would be no reduction in access to the Appeal Site and no reduction in the extent of publicly accessible locations within the Appeal Site from which the scarp would be visible.

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<sup>48</sup> CD7.1; para 19.5

<sup>49</sup> CD7.1; para 2.4, 4<sup>th</sup> bullet

- 8.9. In terms of access to open countryside, the Appeal Site does not represent an isolated pocket of open land, representing the only opportunity to access the countryside – in addition to the facilities provided by Master Park to the south, as already identified, there are also extensive areas of Open Access Land to the north.
- 8.10. In their objection, the R6 state<sup>50</sup> that the Appeal Scheme ‘*would involve a substantial loss of open space and public recreational opportunity*’, a statement which is not supported by evidence. The Appeal Scheme would result in an increase in publicly accessible open space and recreational opportunities.
- 8.11. The R6 objection also states<sup>51</sup> that the Appeal Site ‘*is widely used for recreational purposes by walkers, runners, dog walkers, horseriders and cyclists.*’ Although the experience would change, access for these uses would not be curtailed following implementation of the Appeal Scheme.

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<sup>50</sup> CD8.1A; para 210

<sup>51</sup> CD8.1A; para 154

## 9. THE APPEAL SCHEME AND THE SHNL BOUNDARY VARIATION PROJECT

### Background to the SH National Landscape (AONB) Boundary Variation Project

- 9.1. The Surrey Hills AONB Boundary Variation Project was initiated in 2021 by Natural England (NE). (Although AONBs have been rebranded as National Landscapes, when designating an area, NE legally designate it as an Area of Outstanding Natural Beauty; NE documents therefore refer to AONBs. Following designation as an AONB, land would be branded as a National Landscape.)
- 9.2. Following two rounds of Statutory and public consultation on proposed boundary changes to the SHNL in 2023 and 2024, 20 Proposed Boundary Extension Areas and 19 minor boundary refinements have been identified, representing an area of approximately 129 sq km, representing a 30.5% increase in the area of the SHNL.
- 9.3. The Notice Period for a final period of consultation on the draft boundary variations was launched by NE on November 21<sup>st</sup> 2025, closing on January 14<sup>th</sup> 2026, following which, the designation variation order will be submitted for confirmation to the Defra Secretary of State.
- 9.4. It is not possible to predict how long the Secretary of State's decision on an extended boundary will take following submission of a designation variation order, or whether a Public Inquiry will be called. As an indication, the extension to the Suffolk Coast and Heaths AONB was confirmed in July 2020, a year after submission of the variation order to the Secretary of State.
- 9.5. In appendices to the Statutory Consultation Analysis, published in November 2025, NE clarify certain aspects of the natural beauty assessment and provide advice for decision makers in relation to proposed development within designated areas:
  - NE does not agree that views from transport routes or urban edges should be used as a justification for designating areas of land. The land itself should express sufficient natural beauty whether or not there are views of it from transport networks or built-up areas<sup>52</sup>;
  - There is no presumption against development in a designation, and it is for the relevant local authorities to ensure that planning decisions weigh the purposes of designation against other priorities in their area in making their decisions<sup>53</sup>;
  - Land should not be included merely to seek to protect it from specific development proposals<sup>54</sup>;

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<sup>52</sup> CD15.5; page 8

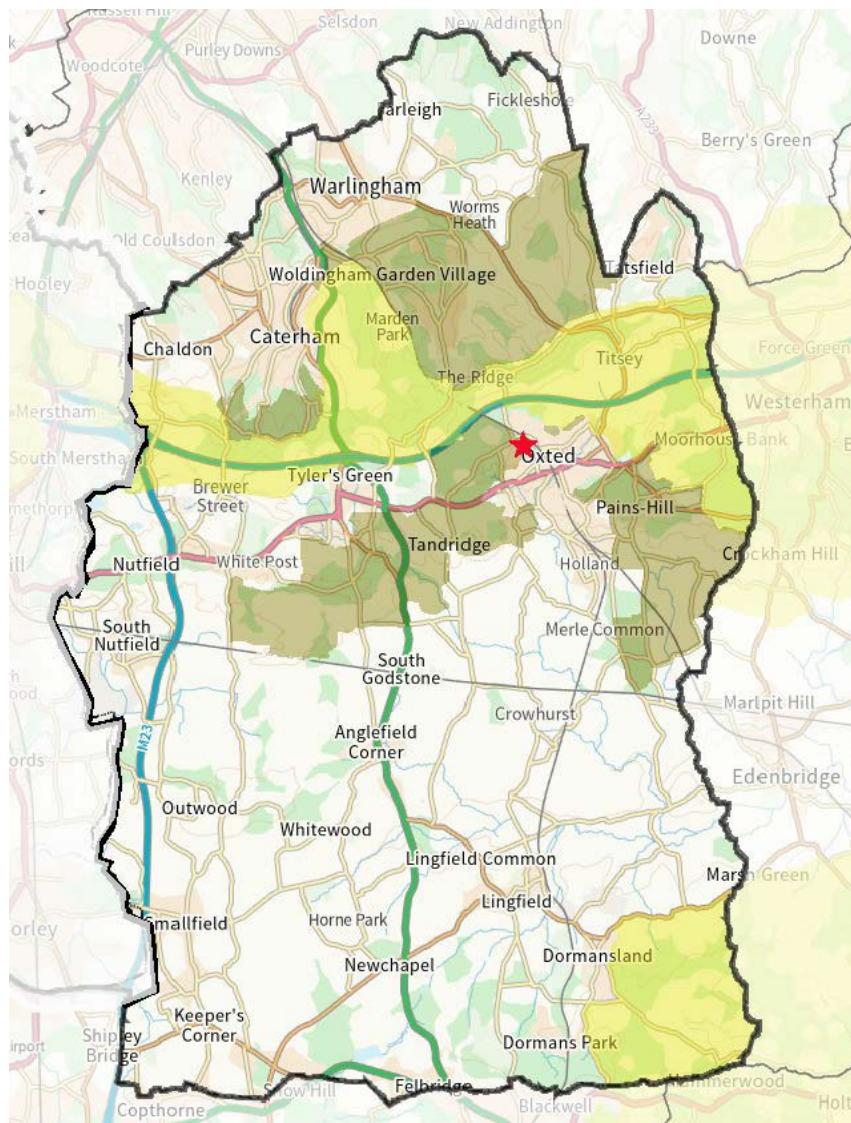
<sup>53</sup> CD15.5; page 20

<sup>54</sup> CD15.5; page 23

- Where major development is likely to happen within the body of an area of qualifying land, a decision has to be made as to whether the development would fragment the land to such an extent that it affects the ability of the area as a whole to meet the technical criteria (Paragraph 5.3 bullet 7 of NE Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England)<sup>55</sup>; and
- There is no presumption against development in AONBs, and appropriate development can be permitted within AONBs, although the NPPF requires the highest level of protection in relation to conserving and enhancing the landscape and scenic beauty of AONBs in relation to plans and planning decisions<sup>56</sup>.

#### *TDC and the proposed SHNL boundary extension*

The SHNL extension areas represent an additional 30sq km of NL within the northern half of TDC (Plan 9.1).



*Plan 9.1: Extent of National Landscape in TDC following proposed extension of SHNL*

- Existing NL shown in yellow
- Proposed NL extension shown in brown

<sup>55</sup> CD15.5; page 24

<sup>56</sup> CD15.5; page 20

## Relevance of the Boundary Variation Project to the Appeal Scheme

### *The Appeal Site and the proposed SHNL boundary extension*

- 9.6. The Appeal Site was not included within areas initially identified by NE as candidates for inclusion in an extended SHNL (Map 1; **Appendix EB5**), however, following the 2023 Statutory and public consultation, the Appeal Site and The Bogs were identified as a potential Addition Area.
- 9.7. The Appeal Site and The Bogs were therefore included in a second round of consultation in 2024, under the reference Addition 13: Land at The Bogs (A13). NE described The Bogs as '*a feature of interest on the edge comprising ancient and deciduous woodland*' and the Appeal Site as '*an open arable field between Barrow Green Lane and the settlement edge ... part of a sweep of agricultural landscape to the north ... affords dramatic views of the chalk scarp*'<sup>57</sup>.
- 9.8. Following the 2024 consultation, in July 2025, A13 was included in a wider candidate extension area which extends to the west of Oxted (shown on Map 12 - Godstone Hills in the Surrey Hills AONB Boundary Variation Project Boundary Considerations report). The Appeal Site (indicated with a star on Plan 9.1) is located within the eastern-most extent of the proposed extension area.
- 9.9. A second proposed extension (Map 11 - Limpsfield of the Boundary Considerations report) wraps around Oxted to the southeast.
- 9.10. For ease of reference, and to illustrate the relationship between Oxted and an extended SHNL, Maps 11 and 12 of the Boundary Considerations Report have been combined in a single map which shows the two proposed extensions to the SHNL which encompass Oxted (Map 2; **Appendix EB5**).

### *The Appeal Scheme and an extended SHNL*

- 9.11. The Appellant's position is that the Appeal Site does not currently form part of the NL and that precedent would suggest that the boundary variations to the SHNL may not be confirmed for a considerable period of time.
- 9.12. In relation to this scenario, NE advise if, during the designation process, land becomes allocated for development or receives planning permission, or is allowed at appeal, then NE will review this decision and alter its proposals to exclude relevant land where necessary<sup>58</sup>.
- 9.13. Notwithstanding this, NE also state that prior to confirmation by the Secretary of State, the inclusion of an area in the variation order - such as the Godstone and Limpsfield extension

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<sup>57</sup> CD15.7; page 7

<sup>58</sup> CD15.5; page 24

areas which abut Oxted – ‘could carry great weight as a material consideration in planning decisions’<sup>59</sup>.

9.14. It is therefore appropriate to assess the scale and extent of any harm to an extended SHNL which could follow the implementation of the Appeal Scheme and the resultant changes to the Appeal Site.

*Effects of the Appeal Scheme on an extended SHNL*

9.15. In the LVIA<sup>60</sup>, I concluded that were the SHNL boundary to be extended to include the Appeal Site, following implementation of the Appeal Scheme, the magnitude of change would remain high and the significance of effects would remain major and adverse for the Appeal Site itself.

9.16. In terms of effects on the wider SHNL, the introduction of built development to the Appeal Site would result in de facto harm to the landscape value and scenic beauty of the NL, giving rise to unavoidable harm to the designated landscape, due to the major adverse effects on the Appeal Site.

9.17. However, it would not be correct to conclude that the significant major adverse effects on the Appeal Site which would follow implementation of the Appeal Scheme would necessarily result in major adverse effects on the wider SHNL.

9.18. The LVIA predicted that were the SHNL boundary to be extended to include the Appeal Site, following implementation of the Appeal Scheme, the magnitude of change experienced by an extended SHNL would be medium. Reflecting its high landscape sensitivity, the significance of residual effects in this scenario would be moderate and adverse<sup>61</sup>.

9.19. It is relevant to drill down into the characteristics which the Appeal Site displays which could be impacted by the Appeal Scheme and could therefore impact on the special qualities of the SHNL were the Appeal Site to be covered by the NL designation.

9.20. It is my assessment that the Appeal Site would make a contribution to the following special qualities of the SHNL were the Appeal Site to be included in an extended SHNL:

- *Hills & views* – there are views from within the Appeal Site towards the scarp and reciprocal views from the scarp towards the Appeal Site;
- *Woodland* – there are areas of woodland on the Appeal Site’s boundaries, including The Bogs, some of which are Ancient Woodland and/or classified in the TS as category A;
- *Water: Rivers & ponds* – there is a stream which feeds The Bogs wet woodland on the Appeal Site’s western boundary;

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<sup>59</sup> CD3.2B; page 3

<sup>60</sup> CD1.22.L; paras 12.6.25

<sup>61</sup> CD1.22.L; paras 12.6.26

- *Agricultural Land* – the Appeal Site is in agricultural use;
- *Routeways: Country Lanes & Rights of Way* – there is a right of way (PROW 97) across the Appeal Site;
- *Settlements & the built heritage* – the Appeal Site forms part of the setting of the church of St Mary the Virgin (Grade I)<sup>62</sup>;
- *Tranquillity & Dark Skies* – the Appeal Site is shown on the CPRE Light Pollution and Dark Skies map (**Appendix EB3**) as experiencing a relatively high level of light pollution and cannot therefore be assessed as currently contributing to dark skies, however development can increase light pollution, resulting in an elevated level of harm to dark skies.

9.21. The Appeal Site does not display characteristics which would contribute to the following special qualities of the SHNL:

- *Heathland* – there is no heathland associated with the Appeal Site;
- *Commons* – there is no commonland associated with the Appeal Site;
- *Chalk downland* - there is no chalk downland associated with the Appeal Site;
- *Boundary features* – there are no notable boundary features associated with the Appeal Site; and
- *Parkland & historic landscape features* – there are no parkland or historic landscape features associated with the Appeal Site;

*Predicted effects on SHNL special qualities were the Appeal Site to be included in an extended SHNL*

#### *Views*

9.22. In views within and across the SHNL, elements of the Appeal Scheme such as rooves and landscaped areas would be discernible in views from elevated locations to the north.

9.23. These glimpses of built form would be within wide panoramic views which contain built form and tree cover associated with the settlement of Oxted and the M25. The Appeal Scheme would be an element in these views, but would not change their structure, integrating with neighbouring developed areas and being incorporated into the existing landscape and townscape.

9.24. More local views across the Appeal Site from PROW 97 and locations on its boundaries would experience adverse effects.

9.25. The Appeal Scheme would impact on views across the Appeal Site.

#### *Woodland and Water*

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<sup>62</sup> CD6.7 para 6.4

- 9.26. None of the woodland on the Appeal Site's boundaries is proposed for removal. Indeed, the wooded character of the SHNL would be enhanced rather than diminished due to the tree planting proposed within the Appeal Scheme.
- 9.27. There is no dispute that The Bogs represents an asset of high value; it is cited as one of the two grounds for the inclusion of A13: Land at The Bogs within the proposed boundary variation order. However, the Appellant's drainage and hydrology experts have assessed that following implementation of the Appeal Scheme, there would be a negligible impact on water flow within The Bogs<sup>63</sup>.
- 9.28. The Appeal Scheme is not therefore predicted to have any adverse impacts on woodland or on water.

*Agricultural land*

- 9.29. The Appeal Site is currently in agricultural use, which would not continue following implementation of the Appeal Scheme.

*Country Lanes and Rights of Way*

- 9.30. As previously detailed, although the character of PROW97 across the Appeal Site would change following implementation of the Appeal Scheme, its route would not be diverted or blocked.

*Settlements and built heritage assets*

- 9.31. Although the Appeal Site forms part of the setting of the Church of St Mary the Virgin, the church lies south of the proposed extended NL boundary and the low degree of less than substantial harm to its significance which the Appellant's heritage expert predicts would have no impact on an extended NL<sup>64</sup>.

*Tranquillity and Dark Skies*

- 9.32. The Appeal Scheme would introduce lighting and vehicle movements and an increased level of activity to the Appeal Site. However, as illustrated by the CPRE Light Pollution and Dark Skies map (**Appendix EB3**), the Appeal Site currently makes no contribution to the dark skies, and as the technical note prepared by MMA Lighting Consultancy (**Appendix EB6**) illustrates, the lighting strategy would be designed to minimise light spill and control light pollution.

*Summary of effects of the Appeal Scheme on an extended SHNL*

- 9.33. The Appeal Scheme would result in adverse effects on an extended SHNL which included the Appeal Site.

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<sup>63</sup> CD6.4 para 6.1 and CD6.8 para 7.11

<sup>64</sup> CD6.7 para 7.5

9.34. However, the majority of the land proposed for inclusion in the extended boundary is relatively rural and does not adjoin existing settlements. In terms of the wider integrity of the NL, the Appeal Site meanwhile:

- is located at the eastern most extent of a proposed boundary extension, adjacent to a settlement;
- is only bordered by proposed NL land to the west and is not an integral part of an extensive tract of land; and
- does not connect areas of existing landscape designation.

9.35. Development of the Appeal Site would not therefore leave isolated pockets of land, fragmenting the NL.

9.36. The wider setting of the Appeal Site is relevant as the proposed built form would be viewed in the context of the existing settlement. As demonstrated in the visualisations of the Appeal Scheme<sup>65</sup>, from elevated locations to the north, the Appeal Site would be a minor component of the wide panoramic views, experienced as an extension of the existing settlement, particularly once the proposed structural planting has matured, softening the visibility of the proposed built form.

9.37. Undeniably, the Appeal Scheme would be harmful to the landscape character and scenic beauty of an extended SHNL which included the Appeal Site, but, given the limited views of it and the Appeal Site's context, this harm would be at a localised level and the significance of effects would be moderate and adverse, rather than major.

#### Visual effects

9.38. In terms of visual effects, the magnitude and nature of change and the significance of residual effects predicted for the visual receptors following implementation of the Appeal Scheme would remain as previously assessed, with major to moderate adverse effects predicted for users of PROW 97, visitors to Oxted burial ground and residents of some properties on Wheeler Avenue.

#### Summary

9.39. It is acknowledged by the Appellant that if the areas detailed for inclusion in the NL in the Draft Variation Order are confirmed by the Secretary of State prior to the grant of planning permission for the Appeal Scheme, then the Appeal Site would have the status of a Protected

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<sup>65</sup> Appendix EB8; views 5 and 6

Landscape and paragraph 189 of the NPPF would apply; the wider implications of this for the planning balance are addressed in the Proof of Evidence of Mr Brown<sup>66</sup>.

9.40. However, there is no presumption against development in a designation and although the significance of effects would remain major and adverse for the Appeal Site itself, it is not predicted that the effects on the wider extended SHNL and its special qualities would be major.

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<sup>66</sup> CD6.2

## 10. EFFECTS OF THE APPEAL SCHEME ON OPENNESS

- 10.1. As set out in paragraph 142 of the NPPF, the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; openness is identified as one of the essential characteristics of Green Belts.
- 10.2. If development proposals are found to be not inappropriate development on previously developed land or grey belt, an assessment of the impact of the proposals on openness is not required, however, if development proposals are found to be inappropriate development within the Green Belt, then an assessment of the effect of the proposals on openness is required.
- 10.3. There is no legal definition of the term '*openness*' in relation to Green Belt, however, case law has established that there are two critical limbs to take into account in an assessment of openness:
  - the spatial dimension: i.e. how built-up the Green Belt is now and how built-up it would become; and
  - the visual dimension: i.e. the visual impact of a proposed development.

### Assessment of openness

- 10.4. Considering to what extent the Appeal Site exhibits the essential Green Belt characteristic of openness, although it is bounded by trees and areas of woodland which limit views of the Appeal Site from some locations, it contains no built form and there are views across it.
- 10.5. In terms of levels of activity, it is assumed that this is limited to recreational use by walkers and riders and that there are minimal to no vehicle movements associated with it.
- 10.6. The Appeal Site in its current undeveloped condition does therefore exhibit the essential Green Belt characteristic of openness.

### Assessment of the effect of the Appeal Scheme on openness

#### *Spatial aspect of openness*

- 10.7. The Appeal Scheme would introduce residential development to part of the Appeal Site, along with the paraphernalia generally associated with residential development, such as garages, cycle and bin storage, boundary treatments etc.
- 10.8. The Appeal Scheme includes areas of public open space and landscaped buffers on the boundaries and the proposed built form is limited in height, however it is inevitable that the

introduction of built form to a currently open field would have a significant impact on the spatial dimension of the openness of the Appeal Site.

*Visual aspect of openness*

- 10.9. With regard to the visual aspect of openness, built form associated with the Appeal Scheme would be introduced to existing open views across the Appeal Site from locations within the Appeal Site and on its boundaries, albeit that the quantum of intervening visual barriers such as trees and woodland on the boundaries and built form in the settlement would screen the Appeal Scheme in views from many locations, limiting the impact on the visual dimension of the openness of the Green Belt in the area.
- 10.10. For these reasons, it is concluded that the Appeal Scheme would result in some limited, localised harm to the visual openness of the Green Belt.

**Summary**

- 10.11. The Appeal Site currently exhibits the essential Green Belt characteristic of openness.
- 10.12. Development of it would result in a significant impact on the spatial dimension of openness due to the introduction of built form to a currently undeveloped site and a limited, localised impact on the visual dimension of openness.

## 11. SUMMARY

### Scope and purpose of landscape evidence

- 11.1. My Proof of Evidence addresses landscape and visual matters raised by TDC in their Statement of Case and refusal of planning permission, comprising:
  - Whether the Appeal Site is a valued landscape;
  - The relationship of the Appeal Site with the Surrey Hills National Landscape (SHNL);
  - The effects of the Appeal Scheme on landscape character, the SHNL and its setting;
  - The effects of the Appeal Scheme on PROW 97 and access to public open space;
  - The Appeal Scheme and the SHNL Boundary Variation Project;
  - The effect of the Appeal Scheme on Green Belt openness
- 11.2. This Landscape Proof of Evidence has been prepared by Elizabeth Bryant, a Chartered Landscape Architect and director and founder of Bryant Landscape Planning, who specialises in assessing and advising on the potential landscape and visual effects of development proposals.
- 11.3. TDC's position is that the Appeal Site is a '*valued landscape*' under the meaning intended of the National Planning Policy Framework (NPPF); that the Appeal Scheme would detract from the character and appearance of the area and the qualities of the SHNL; and that it would result in major adverse effects on public access to and enjoyment of the countryside.
- 11.4. My case is that the Appeal Site is not a '*valued landscape*' in NPPF terms, that the Appeal Scheme would not significantly harm the SHNL, and that visual effects would be limited.

### The Appeal Site and its context

- 11.5. The Appeal Site is a roughly rectangular parcel of agricultural land on the northern edge of Oxted, bounded by a railway line, Oxted burial ground, residential areas, woodland, and Barrow Green Road. Public access is possible via PROW 97, with informal footpaths around the perimeter of the Appeal Site. There are individual trees and areas of woodland associated with the Appeal Site, some of which are protected by Tree Preservation Orders (TPOs). It is adjacent to an area of ancient woodland known as 'The Bogs'.
- 11.6. I assess the Appeal Site as having medium landscape value, reflecting its proximity to the SHNL, whose closest boundary is about 500 meters to the northeast, and its generally good condition. The Appeal Site forms part of the setting of the SHNL.
- 11.7. The landscape context of the Appeal Site beyond the SHNL is characterised by gently undulating farmland, ancient woodland, and a mixture of dispersed settlements; its landscape value is assessed as medium. The landscape value of the SHNL is assessed as high.

11.8. Visibility of the Appeal Site is limited by built form, trees, and the railway, with local views possible from PROW 97, the burial ground and stretches of road adjoining it. In longer views from the SHNL, the Appeal Site is visible at the settlement edge; built form and the M25 are also present in these views.

#### Whether the Appeal Site is a 'valued landscape'

11.9. I conclude that the Appeal Site does not display sufficient features or characteristics to be considered a '*valued landscape*' under NPPF para 187a, although this does not mean it has no landscape value.

- *Designations* - The Appeal Site is not currently covered by any national or regional landscape designation. It was not initially included in areas to be considered as SHNL boundary extensions, although, following public consultation, it has since been recommended for inclusion in an extended SHNL.
- *TDC evidence base* - The TDC Landscape Capacity and Sensitivity Study (2016) assessed the Appeal Site as having moderate value and medium capacity for housing development, scoring it the lowest of four potential development sites assessed in North Oxted.
- *Professional Judgment* - Applying Landscape Institute guidance, I assess the Appeal Site as having medium landscape value, a conclusion which aligns with the TDC study.

#### The Appeal Site and the Surrey Hills National Landscape (SHNL)

11.10. The SHNL covers a significant portion of Surrey. Since the Appeal Site is within the setting of the SHNL, development of it has the potential to affect the character and scenic quality of the National Landscape.

- *Landscape Character* - The area of the SHNL closest to the Appeal Site is the North Downs Scarp, a dramatic feature visible from the Appeal Site which provides an attractive backdrop to the settlement of Oxted and is visible from multiple locations.
- *Visual Relationship* - There are open views from the Appeal Site towards the scarp and reciprocal views from the scarp towards the Appeal Site. However, I conclude that the Appeal Site is a minor element in these wide, panoramic views from the scarp and does not make a significant contribution to the experience or scenic qualities of the SHNL, and its visual influence is low.
- *Special Qualities of the SHNL* - The Appeal Site's current contribution to the SHNL's special qualities is limited to views, manifested in the intervisibility between it and the SHNL. The

Appeal Site does not currently contribute to dark skies due to existing levels of light pollution associated with the adjoining settlement.

### **The Appeal Scheme and embedded mitigation**

11.11. The Appeal Scheme is a landscape-led design; an illustrative landscape masterplan submitted with the application demonstrates how built form could be accommodated within the Appeal Site. Key principles include:

- Limiting building heights to minimise visual intrusion;
- Setting built form back from Barrow Green Road to allow for landscape buffers and structural planting on the boundary;
- Retaining informal footpaths around the Appeal Site boundaries and not diverting PROW 97;
- Providing enhanced planting and landscape buffers to The Bogs and other woodland on the boundaries;
- Minimising removal of mature hedgerows;
- A landscape strategy focussed on native species and increasing tree cover.

### **Effects of the Appeal Scheme on Landscape Character and the SHNL**

#### *Direct Effects*

11.12. The introduction of built form to a currently undeveloped site would result in major adverse effects on the Appeal Site itself, permanently changing its character. However, the layout considers the long-term viability and health of trees and woodland associated with the Appeal Site and the Appeal Scheme would not result in adverse effects on them or on The Bogs.

#### *Effects on Landscape Character*

11.13. In relation to the extent to which the changed character of the Appeal Site would harm the wider landscape, particularly the SHNL, I conclude that harm to the surrounding landscape would be limited and less than significant, with effects reducing rapidly with distance. The new settlement edge would replicate the existing character, with glimpses of built form encompassed by trees.

#### *Effects on the SHNL and its setting*

11.14. Whilst the high landscape value of the SHNL is agreed by all parties, I do not find that the Appeal Site currently makes an important contribution to the SHNL's experience or scenic

qualities. The Appeal Scheme would be visible in panoramic views from elevated locations within the SHNL to the north but would integrate with the existing settlement and the overall structure of these views would not change. The magnitude of change experience by the SHNL is predicted to be negligible, representing a negligible significance of effect.

- 11.15. The claim by the R6 that the Appeal Scheme would be ‘highly visible’ from ‘multiple viewpoints’ is not substantiated.

#### *Effects on Public Right of Way (PROW 97) and access to Public Open Space*

- 11.16. For users of PROW 97, there would be major adverse effects on visual amenity due to the introduction of built form. However, the Appeal Scheme does not require blocking or diverting the bridleway, and the informal footpaths around the perimeter of the Appeal Site would be formalised. The Appeal Scheme provides areas of open space, increasing public access and there would be no reduction in locations from which views of the scarp would be possible.
- 11.17. While the experience for users of the bridleway would change, and adverse effects on visual amenity are predicted, the Appeal Site is not public open space, and residents have access to other areas of open spaces such as Master Park to the south and the extensive Open Access Land in the SHNL to the north.

#### *The Appeal Scheme and the SHNL Boundary Variation Project*

- 11.18. Natural England’s (NE) Surrey Hills Boundary Variation Project proposes to extend the SHNL to the west, north and east of Oxted, including the Appeal Site and The Bogs. The Appeal Site was not initially identified as a potential extension but was later recommended for inclusion following consultation.
- 11.19. NE’s guidance clarifies that inclusion in a designation is not a presumption against development, and planning decisions must weigh the purposes of designation against other priorities.

#### *Effects of the Appeal Scheme on an extended SHNL*

- 11.20. If the Appeal Site becomes part of the SHNL, the introduction of built development would cause unavoidable harm to the landscape value and scenic beauty of the National Landscape, but this harm would be localised. The Appeal Site is at the edge of the proposed NL extension and adjacent to the settlement; the wider integrity of the SHNL would not be compromised.
- 11.21. Visual effects would remain as previously assessed, with significant adverse effects for users of PROW 97, visitors to the burial ground, and some residents, but limited wider impact.

## Effects on Green Belt openness

11.22. The Appeal Site is designated as Green Belt, whose essential characteristic is openness. The development would harm the spatial dimension of openness by introducing built form; the harm to the visual aspects of openness would be limited and localised.

## Summary and conclusions

11.23. My main conclusions are:

- The Appeal Site does not meet the criteria to be considered a 'valued landscape' under NPPF para 187a, although it has medium landscape value.
- The Appeal Site's contribution to the SHNL is limited, and the Appeal Scheme would not result in significant adverse harm to the SHNL's character or special qualities.
- The Appeal Scheme would cause major adverse effects on the Appeal Site and on users of PROW 97, but wider landscape and visual effects would be limited.
- Whilst there would be some unavoidable harm to the SHNL following its extension to include the Appeal Site at the local level, the overall effects on the SHNL and its special qualities would not be major.