

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

PINS REF: APP/M3645/W/25/3372747

LANDSCAPE AND VISUAL PROOF OF EVIDENCE



Ref: 25-109 V6

Client: Tandridge District Council

Site: Land South of Barrow Green Road, Oxted

Author: Ian Dudley BSc(Hons) MICFor CEnv CMLI

Date: 29/12/2025

1. INTRODUCTION

Personal Details

- 1.1. My name is Ian Dudley, and I am a Director of Rowellian Environmental Consulting Ltd, an expert landscape consultancy practice.
- 1.2. I hold a Bachelor of Science honours degree in Forestry from Bangor University. I am a Chartered Member of the Landscape Institute, a Chartered Member of the Institute of Chartered Foresters, and a Chartered Member of the Society for the Environment.
- 1.3. My professional experience over the last 25 years has included land management, management planning, green infrastructure planning and assessment, landscape and visual impact assessment, landscape character assessment, landscape design and landscape planning. I have contributed to the landscape sector at regional and national levels, sitting on panels and committees for the Landscape Institute, Natural England and Defra on matters such as the development of the national Green Infrastructure Standards and Biodiversity Metric. I have served at the Chair of the Royal Forestry Society for England, Wales and Northern Ireland, and I am currently the Vice Chair of the Landscape Institute's East Midlands Branch.
- 1.4. I am an experienced landscape witness, having acted on behalf of both public and private sector bodies for over 10 years and for a range of development types including residential, leisure and industrial developments.
- 1.5. I believe that the facts and matters contained in this Proof of Evidence are true and that I am acting in accordance with the codes of my various professional institutions.

Project Involvement

- 1.6. I was originally appointed by Tandridge District Council (the 'Council') in July 2025 to comment upon an outline planning application (Ref. TA/2025/245) by Croudace Homes (the 'Appellant') for up to 190 residential dwellings, an 80-bed residential care home and associated infrastructure on land south of Barrow Green Road, Oxted, Surrey (the 'Site'). Following the Council's refusal of planning permission on 15th August 2025 and the Appellant's submission of an appeal against this decision, I have been appointed to prepare evidence and to present this evidence at a forthcoming Public Inquiry due to commence in January 2026.
- 1.7. I visited the Site and its landscape setting on 1st August 2025 prior to the submission of my comments on the planning application, and I re-visited the Site on 5th September 2025.

Scope of Evidence

- 1.8. This Proof of Evidence covers matters relating to the anticipated landscape and visual impacts of the Appeal Scheme.
- 1.9. It will set out my independent appraisal of the Site and its landscape and visual characteristics, and the anticipated impacts of the Appeal Scheme, based upon the nationally accepted guidance presented within Guidelines for Landscape and Visual Impact Assessment Third Edition (Landscape Institute and Institute of Environmental Management & Assessment, 2013).
- 1.10. This evidence has been found to support the Council's second, third and eighth reasons for refusal, which read as follows:
 - 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.*
 - 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.*
 - 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.*

2. POLICY BACKGROUND

Relevant National Planning Policy and Guidance

National Planning Policy Framework (December 2024)

- 2.1. The latest version of the NPPF was published in December 2024, replacing a previous version of this document. It sets out the Government's planning policies for England, and how these should be applied, as well as setting out a framework for the production of locally prepared housing and development plans.
- 2.2. Chapter 8 of the NPPF relates to the promotion of healthy and safe communities. It states at Paragraph 96 that planning policies and decisions should aim to achieve healthy, inclusive and safe places that promote social interaction, are safe and accessible, and enable and support healthy lifestyles. Measures to achieve these objectives include street layouts enabling easy pedestrian and cycle connections, active street frontages, clear and legible pedestrian and cycle routes, high quality public spaces that encourage active and continual use, and the provision of safe and accessible green infrastructure.
- 2.3. Paragraph 103 recognises the importance of access to a network of high-quality open spaces and opportunities for sport and physical activity for the health and well-being of communities.
- 2.4. Paragraph 105 states that planning policies and decisions should protect and enhance Public Rights of Way and access, including taking opportunities to improve users' facilities and to create additional connections to existing networks.
- 2.5. Chapter 12 of the NPPF relates to the achievement of well-designed places. In particular, it recognises that good design is a key aspect of sustainable development, creates better places in which to live and work and helps to make development acceptable to communities, and it establishes the creation of high quality, beautiful and sustainable places as a fundamental goal of the planning and development process.
- 2.6. Paragraph 135 sets out a number of positive design criteria that planning policies and decisions should ensure. These include contributing to the overall character of an area in the long term, being visually attractive, being sympathetic to local character and history, establishing or maintaining a strong sense of place, and creating safe, inclusive and accessible places that promote health and well-being.
- 2.7. Paragraph 136 recognises the importance of trees in creating high quality places and contributing to climate change adaptation and mitigation. It recommends that planning policies and decisions ensure that new streets are tree-lined unless there are clear, justifiable and compelling reasons why this is not appropriate, and also promotes the incorporation of trees elsewhere in developments. To ensure the sustainability of these

benefits, it recommends that appropriate measures should be in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible.

- 2.8. Paragraph 139 states that development that is not well designed should be refused, and it attributes significant weight to development that is in compliance with local design guidance, and/or which is outstanding or innovative, promoting high levels of sustainability.
- 2.9. Chapter 15 of the NPPF relates to the conservation and enhancement of the natural environment. Paragraph 187 states that planning policies should contribute to and enhance the natural and local environment by a range of measures including protecting and enhancing valued landscapes (in a manner commensurate with their statutory status or identified quality in the development plan) and recognising the intrinsic character and beauty of the countryside.
- 2.10. Paragraph 189 states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the highest status of protection in relation to these issues, and it further states that scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas. Paragraph 190 states that the consideration of applications within these areas should include any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

National Planning Practice Guidance (PPG)

- 2.11. Paragraph 034, Reference ID: 8-034-20190721 of the PPG presents the national guidance for landscape and planning. It states that:

The National Planning Policy Framework is clear that plans should recognise the intrinsic character and beauty of the countryside, and that strategic policies should provide for the conservation and enhancement of landscapes. This can include nationally and locally-designated landscapes but also the wider countryside.

Where landscapes have a particular local value, it is important for policies to identify their special characteristics and be supported by proportionate evidence. Policies may set out criteria against which proposals for development affecting these areas will be assessed. Plans can also include policies to avoid adverse impacts on landscapes and to set out necessary mitigation measures, such as appropriate design principles and visual screening, where necessary. The cumulative impacts of development on the landscape need to be considered carefully.

- 2.12. With specific regard to nationally important landscapes and their settings, Paragraphs 041 and 042, Reference ID: 8-041-20190721 of the PPG state the following:

All development in National Parks, the Broads and Areas of Outstanding Beauty will need to be located and designed in a way that reflects their status as landscapes of the highest quality. Where applications for major development come forward, paragraph 172¹ of the Framework sets out a number of particular considerations that should apply when deciding whether permission should be granted.

Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.

Adopted Local Plan

Tandridge Core Strategy 2008

- 2.13. The Tandridge District Core Strategy was adopted by the Council in October 2008, and it forms the Part 1 Local Plan, setting out key planning policies for the district.

- 2.14. Policy CSP13 relates to Community, Sport and Recreation Facilities and Services. Its penultimate paragraph protects the public enjoyment of Public Rights of Way in the district, and reads as follows:

The Council will seek to protect the Rights of Way network, in particular the North Downs Way national trail, the Greensand Way and Vanguard Way recreational paths from developments that would adversely affect the enjoyment of users of the network. The Council will encourage improvements to the network and the North Downs Way.

- 2.15. Policy CSP20 relates to National Landscapes, formerly titled Areas of Outstanding Natural Beauty, and it reads as follows:

The conservation and enhancement of the natural beauty of the landscape is of primary importance within the two Areas of Outstanding Natural Beauty, reflecting their national status. The principles to be followed in the area are to:

- a) conserve and enhance the special landscape character, heritage, distinctiveness and sense of place of the locality.*

¹ Paragraph 190 of the December 2024 NPPF

- b) conserve and enhance important viewpoints, protect the setting and safeguard views out of and into the AONB.*
- c) protect prominent locations on skylines and slopes and for development to take advantage of existing landscape features and tree screening.*
- d) support suitable located sustainable development necessary to facilitate the environmental, economic and social wellbeing of the AONBs and their communities.*
- e) promote access to, particularly by means other than the car, recreation within and enjoyment of the area.*
- f) apply the highest environmental design standards to development.*

The same principles will be applied in the associated Area of Great Landscape Value which will be retained for its own sake; as a buffer to the Surrey Hills AONB and to protect views from and into the AONB. The AGLV will be retained until such time as there has been a review of the AONB boundary.

2.16. Policy CSP21 specifically relates to landscape character and the countryside, and reads as follows:

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

Tandridge Local Plan: Part 2 – Detailed Policies 2014

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

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

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

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

Surrey Hills National Landscape

Surrey Hills Management Plan 2025-2030

- 2.19. This statutory document presents an overall vision for the Surrey Hills National Landscape, defines its Special Qualities, and sets out policies to achieve that vision.
- 2.20. The Surrey Hills was one of England's first National Landscapes (then Areas of Outstanding Natural Beauty), designated in 1958, and the purpose of the designation is to protect the Special Qualities of this nationally important landscape.
- 2.21. The Statement of Significance for the National Landscape reads as follows:

"A landscape mosaic of farmland, woodland, heaths, downs and commons has inspired some of the country's greatest artists, writers and architects over the centuries. The National Landscape includes internationally and nationally important priority habitats which support protected species. The Surrey Hills attract millions of visitors every year who contribute to the economy of the area. The Hills are protected as part of London's Metropolitan Green Belt and provide an outstanding natural resource for London and Surrey residents to enjoy outdoor pursuits, taste local food and drink, and to explore market towns and picture-postcard villages."

- 2.22. The overall 75-year vision for the National Landscape is as follows:

The Surrey Hills is a nature-rich landscape connecting its ancient trees, woodland, heathland and downland, whose beauty is enjoyed and appreciated by all parts of society. As part of a network of internationally protected landscapes, it has a thriving community and economy, delivers natural health and wellbeing, and is resilient to climate change.

- 2.23. Under the topic of 'Planning', the importance of the setting of the National Landscape is recognised, with the overall Aim reading as follows:

Development conserves and enhances local character and the environmental quality of this nationally important protected landscape and its setting.

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

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

2.25. Policy P11 specifically relates to the setting of the National Landscape, and reads as follows:

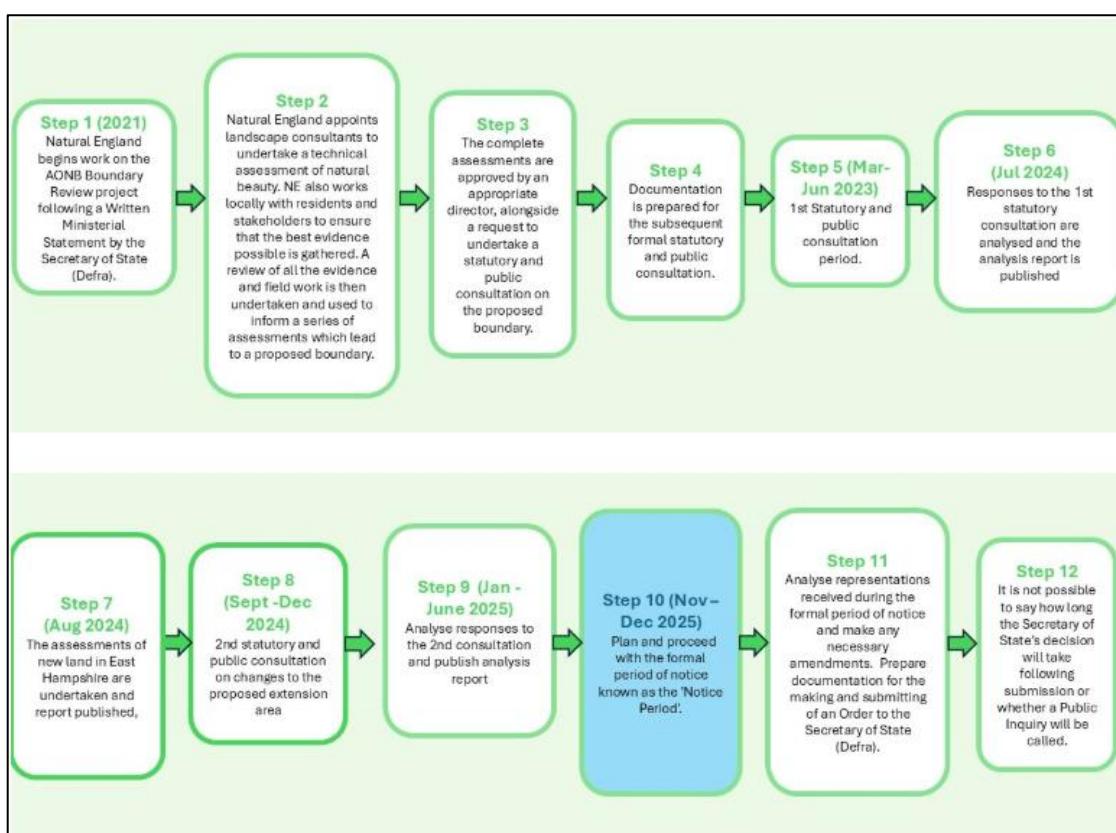
Development proposals outside the boundary of the Surrey Hills National Landscape must not cause harm to the setting of the National Landscape in terms of public views to or from it or generate harmful additional traffic flows along country lanes within the National Landscape.

Surrey Hills National Landscape Boundary Variation Project

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

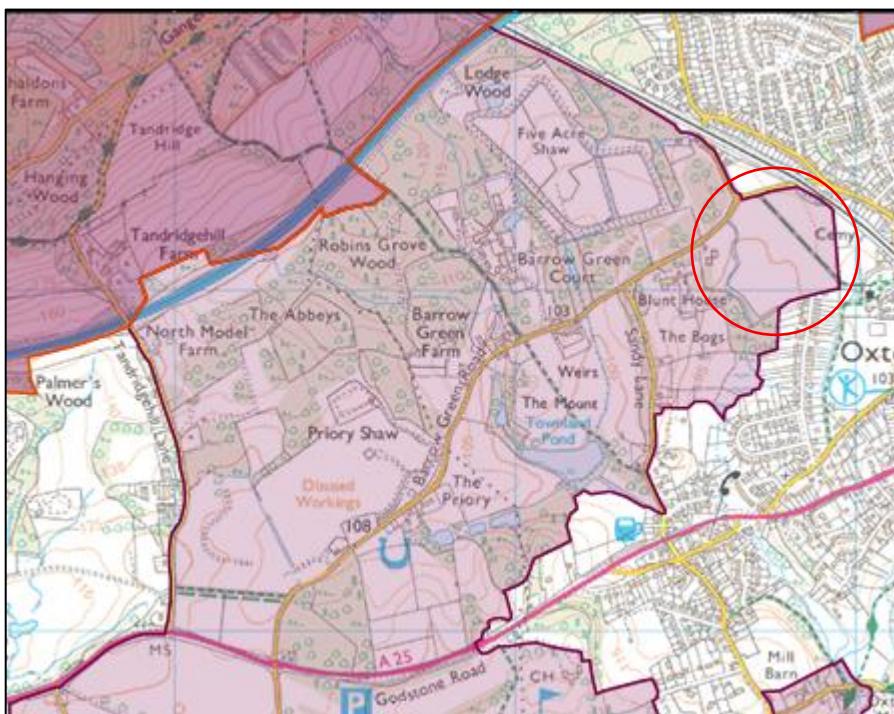
2.27. The Project involves a rigorous, 12-step process commencing with a technical assessment by landscape consultants and then three rounds of consultation before submission of the final proposal to the Secretary of State for approval. A graphic produced by DEFRA setting out the process and highlighting the current stage is reproduced as Figure 1 below.

Figure 1: DEFRA graphic illustrating Surrey Hills National Landscape Boundary Variation Project process



- 2.28. The Surrey Hills aspect of the project has been subject to its second and final round of public consultation from September to December 2024 (Step 8 on Figure 1), and the results of the consultation were published in June 2025 (Step 9 on Figure 1). This included alterations to the National Landscape boundary that had arisen from the first round of consultation undertaken in 2023 (Step 5 on Figure 1). The draft Order is now in its final, formal Notice Period, which expires on 14th January 2026. It is therefore considered that the project is at an advanced stage, with 10 of the 12 steps completed.
- 2.29. The Site is located in the Godstone Hills area of the boundary variation. The draft boundary plan for the Godstone Hills extension is presented as Map 12 (CD 8.3) within the draft Order documents. An extract of the area closest to the Site is reproduced as Figure 2 below, with the Site location approximated with a red circle. The entire Site area is proposed to fall within the extended National Landscape.

Figure 2: Extract from draft National Landscape Boundary Variation Order Map 12



3. LANDSCAPE BASELINE APPRAISAL

Appraisal of Site and Context Character

- 3.1. The Site currently comprises approximately 9.7 hectares of gently sloping arable farmland with an area of tall herb vegetation to the south-west. An aerial photograph of the Site is reproduced as Figure 3 below.
- 3.2. The Site is bisected by Public Bridleway Oxted 97, which runs through it in a north-south direction, connecting Oxted to the south with the Surrey Hills to the north via Chalkpit Lane. The bridleway is marked by a corridor of vegetation, and it is well used by the public. A desire line path runs around the edge of the Site, which is also used by the public for circular walking, and there is an informal entrance from Wheeler Avenue.
- 3.3. A mature field ash tree is located in the southern part of the Site, and a cluster of oak trees is located at the northern end of the public bridleway.
- 3.4. The Site is bound on all sides by mature native vegetation, which serves to partially separate it from the adjacent settlement, creating a sense of isolation within some parts. The only clear views into the Site from adjacent land are from the cemetery to the east. Figure 4 is a photograph taken during my first visit to the Site, and it illustrates the view towards Wheeler Avenue from the Site, demonstrating the extent to which the adjacent settlement is obscured.
- 3.5. The settlement of Oxted is present to the south, east and north-east of the Site, although the Site is separated from residential areas by the grounds of the Grade I Listed St Mary's Church to the east, and by a railway line to the north. Wheeler Avenue is located directly to the south, with dwellings arranged perpendicular to the Site as shown on Figure 3 but largely obscured by vegetation. The Site is therefore not clearly related to the settlement despite its close proximity.

Figure 3: Google Earth aerial photograph of the Site and its landscape context dated June 2021



Figure 4: View south from the Site towards Wheeler Avenue



- 3.6. The land to the south-west, west and north-west of the Site is largely rural in character, including The Bogs to the south-west, an area of ancient semi-natural wet woodland and candidate Site of Nature Conservation Importance. The Site's western boundary largely comprises a wooded stream corridor, which is one of the headwaters of the River Eden, dividing the Site from the grounds of a private dwelling. An area of scrubland and woodland is located to the north of Barrow Green Road and west of Chalkpit Lane.

- 3.7. The Surrey Hills National Landscape forms a strong topographic backdrop to the north of the Site, with clear views of wooded slopes and open ground, as illustrated by Figure 5 below, which I took during my field survey. It is common ground that the Site lies within the setting of the National Landscape. Figure 5 also serves to illustrate the arable character of the Site, and its immediate wooded context. The public bridleway that runs through the Site can be seen to the right of the image.
- 3.8. The hills to the north of the Site are crossed by the North Downs Way National Trail and the Vanguard Way Long Distance Recreational Route, and several promoted viewpoints on the slopes include views of the Site in context with the wider landscape.

Figure 5: View towards the Surrey Hills National Landscape from the Site



Published Character of the Wider Setting

National Level Assessment

- 3.9. Natural England's National Character Assessment places the Site within the Wealden Greensand National Character Area (NCA 120) (CD 15.9). This is broadly described as a long, curved belt of land with a significant proportion of woodland cover comprising ancient woods and more recent conifer plantations, in addition to more open areas of heath on acidic soils, river valleys and mixed farming, including areas of fruit growing.

3.10. The key characteristics for the Wealden Greensand are as follows, with those considered representative of the Site and its setting highlighted in bold text:

- **A long, narrow belt of Greensand, typified by scarp-and-dip slope topography, including outcrops of Upper Greensand, Gault Clay and Lower Greensand. The Greensand forms escarpments separated by a clay vale: the overall undulating and organic landform – particularly in the west – gives a sense of intimacy to the landscape. Leith Hill in Surrey is the highest point in south-east England.**
- **There are extensive areas of ancient mixed woodland of hazel, oak and birch, with some areas having been converted to sweet chestnut coppice in past centuries. These areas reflect the diverse geology, including the distinctive chalk grassland elements within the East Hampshire Hangers Special Area of Conservation (SAC), the wooded commons ('charts') of East Surrey and West Kent, and conifer plantations.**
- **Semi-natural habitats include: remnant lowland heathland, mostly concentrated in West Sussex, Hampshire and West Surrey; the wetlands associated with the River Arun in West Sussex; and unimproved acid grasslands found in commons, parklands, heathland and other areas of unimproved pasture.**
- **Fields are predominantly small or medium, in irregular patterns derived from medieval enclosure. Boundaries are formed by hedgerows and shaws, with character and species reflecting the underlying soils. On the clay, hedgerows are dense and species-rich, with occasional standard oaks. On more acidic soils they generally consist of hawthorn and blackthorn, also with occasional oak trees, and often trimmed low.**
- **Agricultural land comprises a mosaic of mixed farming, with pasture and arable land set within a wooded framework. There is a fruit-growing orchard belt in Kent and also around Selborne in Hampshire.**
- **The rural settlement pattern is a mixture of dispersed farmsteads, hamlets and some nucleated villages. Large houses set within extensive parks and gardens are found throughout the area.**
- **In the east of Kent, the Wealden Greensand has a gentler and more open aspect than in the wooded west. This part of the area is also more marked by development, with the presence of major towns and communication corridors such as the M26, M25 and M20 motorways and railway lines including the Channel Tunnel Rail Link (High Speed 1).**
- **The local built vernacular includes the use of Greensand, ragstone and, in the west, malmstone, bargate stone, plus dark carrstone patterned in the mortar between stones ('galleting') in Surrey, as well as timber-framing and weatherboarding.**

- There are a range of historic landscape features, including field monuments, old military defences, prehistoric tumuli, iron-age hill forts, Roman forts, the Royal Military Canal, small quarries and relics of the iron industry (including hammer ponds). Sunken lanes cut into the sandstone are a historic and characteristic feature, as are older deer parks and more recent 18th-century parklands.
- Surface water is an important feature across the Greensand, with many streams and rivers passing through the NCA: the Western Rother, Wey, Arun, Medway and the Great and East Stour.
- The Greensand ridge meets the coast of Kent between Folkestone Warren and Hythe. While most of the coastal strip is now built up and protected by sea defences, the undeveloped sea cliffs at Copt Point provide important geological exposures, are designated for their nature conservation interest and fall within the Dover–Folkestone Heritage Coast.

3.11. Based upon the above analysis, the Site and its setting are considered to be moderately representative of the Wealden Greensand National Character Area.

Surrey Landscape Character Assessment (2013)

- 3.12. The Surrey Landscape Character Assessment (CD 15.1) places the Site within the Merstham to Clacket Lane Greensand Valley Character Area, associated with the Greensand Valley Landscape Type. The Site also has a strong perceptual relationship with the slopes of the Box Hill to Tatsfield Chalk Ridge Character Area, associated with the Chalk Ridge Landscape Type, which forms the backdrop to the north of the Site as illustrated by Figure 5 above.
- 3.13. The key characteristics of the **Greensand Valley Landscape Type** are as follows, with those considered representative of the Site and its setting highlighted in bold text:

- **Valley based on greensand with alluvium, diamicton and sand and gravel drift geology.**
- **Moderately flat or gently undulating farmland enclosed by the North Downs scarp to the north and the hills of the greensand ridge to the south.**
- **The area is crisscrossed the headwaters of a number of important river catchments. The Pipp Brook which flows in to the River Mole, the Tillingbourne which flows in to the Wey, and the River Eden.**
- Presence of the Tillingbourne with ponds, streams and weirs and the Pipp Brook with lakes, ponds and streams.
- The Tillingbourne, flowing west, is set within an intimate, small scale valley floor with a chain of historic villages set amongst pastures, woodland and parkland.
- The Pipp Brook, flows east to the River Mole around Westcott and through Dorking.

- **The headwaters of the River Eden flows south from Godstone and Oxted towards Edenbridge in Kent.**
- **Semi-enclosed area with rural views to the open pastoral valley sides, the North Downs scarp and the wooded slopes of the greensand hills.**
- **Contains east west transport links running parallel with the scarp to the north.**
- **Historic landscape pattern based on mixed farming on the easily cultivated lighter soils between the chalk of the North Downs and the heavier clay soils of the low weald.**

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

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

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

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

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

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

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

- **Underlain by Folkestone Formation Sandstone, with areas of Gault Formation Mudstone to the north.**
- **Undulating landform, rising up to meet the chalk ridge scarp to the north and wooded greensand hills to the south.**
- **The predominant land use consists of medium-large scale, open arable fields, but there is a mixture of other uses including, generally smaller pastoral fields, large scale sand quarry workings, golf courses, road and motorway corridors and settlement.**
- **Blocks of woodland occur across the character area, with more substantial areas of woodland to the west of Oxted. Hedgerows line field boundaries, but are limited in some places with larger arable fields. Smaller parcels of land associated with settlement often have good tree cover. There is ancient woodland, the size and occurrence increasing at the eastern end of the character area.**
- **Northerly views from the character area include the chalk ridge scarp.**
- **The M25 motorway runs along the length of the northern edge of the character area. Junctions 6, 7 and the Clacket Lane services, of the M25 are located within the character area. A limited number of roads, including the A25 and rural lanes cross the character area.**
- **A comprehensive network of public rights of way criss-cross every part of the character area, including the Tandridge Border Path, Greensand Way and Vanguard Way Recreational Paths and the North Downs National Trail.**
- **The character area includes the village of Godstone and settlements such as Merstham, and wraps around Oxted and Bletchingley. Elsewhere, there are isolated dwellings and farmsteads, with settlement becoming more limited at the eastern end of the character area. Merstham is a linear, low density settlement designated as a Conservation Area, and is encircled by motorway, road and rail routes at the north-west corner of the character area.**
- **There are a number of other Conservation Areas, including Pendell Court and Place Farm and Brewer Street, at the western end of the character area, and Godstone in the centre of the character area. The character area includes a small area of registered common land at Clacket Common in the eastern end of the character area, a few scheduled monuments, and part of the historic park/garden at Titsey Place.**

- There are a number of small woodland areas designated as Sites of Nature Conservation Importance. A few larger blocks of woodland are designated as Sites of Special Scientific Interest, around Titsey Woods.
- **Relatively rural landscape, with tranquillity and remoteness varying across the Character Area due to the degree of urban influence from settlement and roads.**

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

Tandridge Landscape Capacity and Sensitivity Study (2013)

- 3.21. This study was published by the Council as part of the evidence base of the now withdrawn draft Local Plan 2033. It considered the landscape sensitivity of a number of potential development parcels around the main settlements in the district.
- 3.22. The Study significantly pre-dates the Surrey Hills Boundary Review Project, which commenced in 2021, and therefore this was not a consideration in its outputs.
- 3.23. The study identifies the Site as Parcel OXT007 and it provides an analysis of its landscape characteristics based upon various criteria, feeding into overall scores for landscape sensitivity and value.
- 3.24. The parcel is scored as being of Substantial visual sensitivity, due to the availability of views towards the Surrey Hills, the public bridleway crossing the Site, and inward views from adjacent areas.
- 3.25. The overall landscape capacity of the Site was judged to be Medium, derived from scores of Moderate value and Moderate sensitivity. The study made the following observation with regard to the Site's capacity for development:

With moderate sensitivity and value, site OXT007 is judged to have a medium landscape capacity for housing development. The site would potentially be suitable in landscape terms for limited housing proposals, but would need to take into consideration views and the site's contribution to the setting of the surrounding landscape, including the AONB, and demonstrate no adverse impacts on the setting of the existing landscape and settlement. Other evidence relevant to the site's suitability for development should also be considered.

4. DESCRIPTION OF THE APPEAL SCHEME

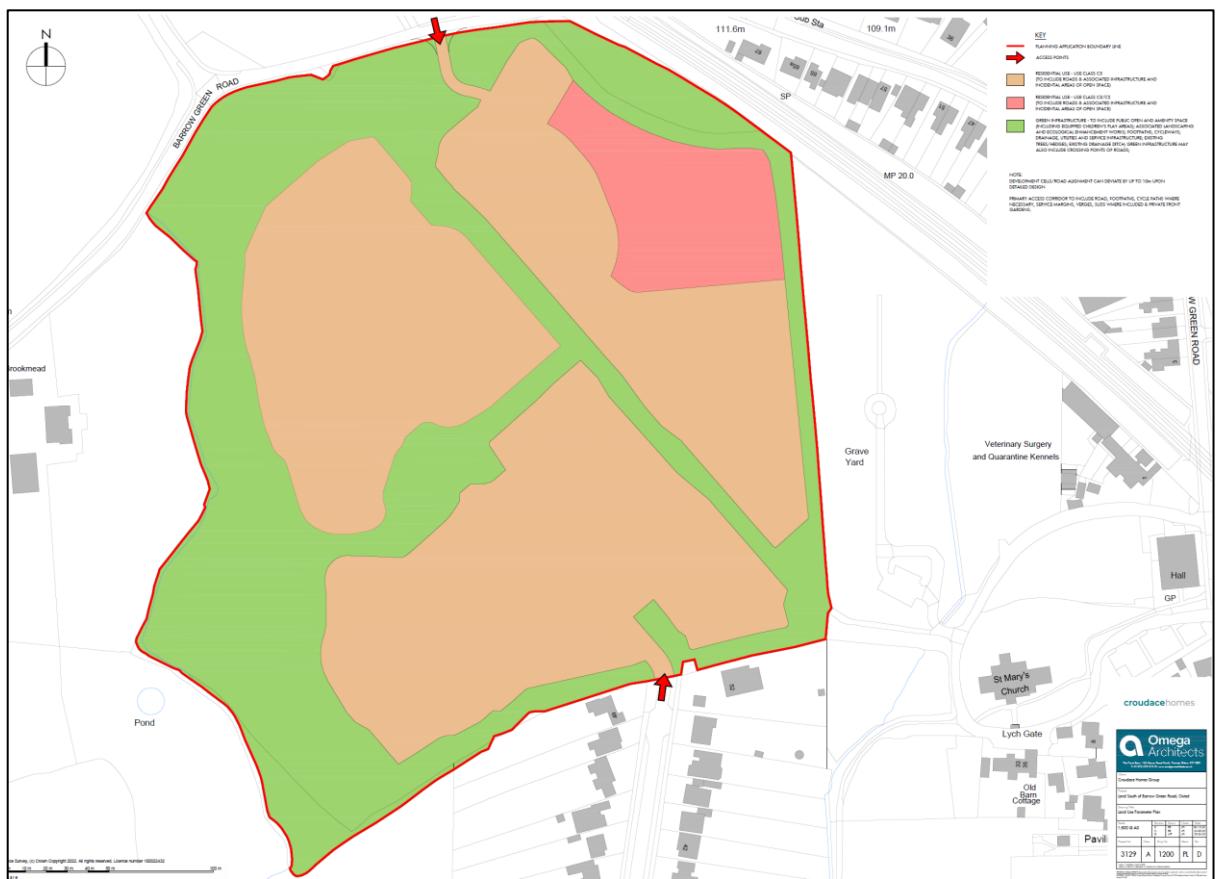
- 4.1. The Appeal Scheme comprises an outline planning application with the following description:

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

Parameter Plans

- 4.2. A Land Use Parameter Plan has been submitted for the proposed development, and this is reproduced as Figure 6 below.

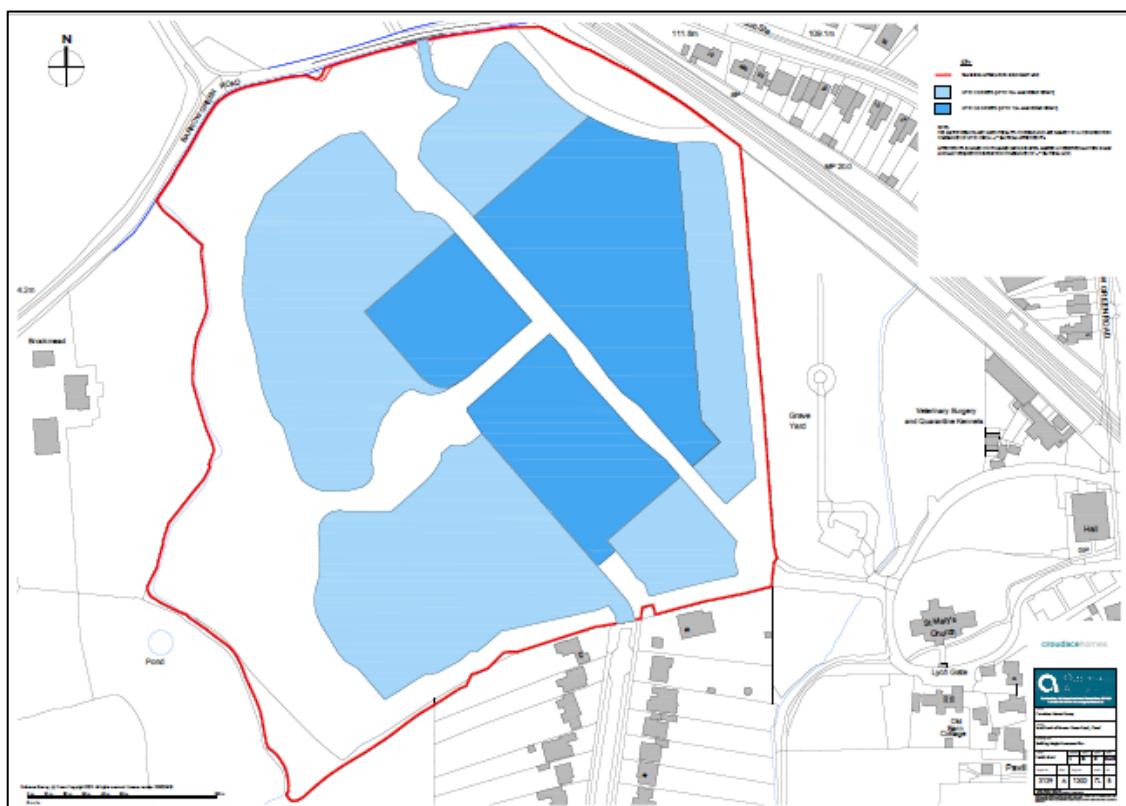
Figure 6: Submitted Land Use Parameter Plan



- 4.3. The Parameter Plan shows the main residential areas arranged in three parcels in the centre of the Site. The residential care facility is located in the north-eastern corner of the Site, shown in red on Figure 6.
- 4.4. Access to the Site is proposed via connections to Barrow Green Road to the north and Wheeler Avenue to the south, indicated by red arrows on the drawing.

- 4.5. Green infrastructure is proposed around the periphery of the Site, and in narrow corridors of approximately 10 metres in width between the residential parcels, although it is noted that this would include road crossings that would truncate the corridors. The majority of the green infrastructure area occurs along the western and northern boundaries, providing an offset of the built parcels from The Bogs and Barrow Green Road, and retaining the area of existing woodland that falls within the Site.
- 4.6. A Building Height Parameter Plan has also been submitted, and this is reproduced as Figure 7 below. This shows buildings of up to 12m ridge height (2.5 storeys) in the central and northern part of the Site, and up to 10m ridge height (2 storeys) for the remainder. The drawing notes, however, that the heights are subject to a 'construction tolerance' of plus or minus two metres, which gives provision for the buildings to be up to 14m and 12m respectively.

Figure 7: Submitted Building Height Parameter Plan



Illustrative Design Information

- 4.7. In addition to the Parameter Plans, which have been submitted for approval, the Appellant has submitted illustrative design information to show how the scheme could come forward. In particular, an Illustrative Masterplan showing dwellings, access and green infrastructure has been submitted and this is reproduced as Figure 8 below.

Figure 8: Illustrative Masterplan



- 4.8. Figure 8 shows the dwellings arranged in a perimeter block layout with dwellings in the southern part accessed from Wheeler Avenue and those in the northern part accessed from Barrow Green Road, with no vehicular access shown between these areas. The healthcare facility is shown as a substantial structure in the north-eastern part of the Site, set within amenity and meadow grassland with a car park to the north.
- 4.9. Public Bridleway Oxted 97 is shown as a narrow, urbanised corridor with 2.5 storey dwellings on either side. At its northern end, the route forks and the existing connection with Barrow Green Road is not shown. Instead, it joins an access road further east, which leads to the northern development entrance onto the public highway. A circular walking route is shown following the Site's western perimeter.

4.10. An area of public open space of varying width is shown at the western edge of the development, comprising open meadow areas and drainage ponds, with scattered tree planting. A corridor of open space then provides a connection between this western area and the public bridleway corridor, encompassing the existing mature ash tree within the Site.

Submitted Landscape and Visual Impact Assessment

- 4.11. The Applicant has submitted an Environmental Statement as part of the application, which includes a chapter covering landscape and visual effects. This has been prepared by a Chartered Landscape Architect.
- 4.12. This is compliant with the Guidelines for Landscape and Visual Impact Assessment Third Edition, which is the current guidance.
- 4.13. I will discuss various sections of the LVIA in the following paragraphs.

Published assessments

- 4.14. The LVIA correctly identifies the published character areas in which the Site is located, although it does not reference the Landscape Types occupied by the Site and its setting, which are equally relevant.
- 4.15. In paragraph 12.4.27 it presents an abbreviated list of the key characteristics of the Merstham to Clacket Lane Greensand Valley Character Area, with no explanation given as to why this is the case. I have presented the full list in Section 3 above with my analysis of the level of representation of the various receptors.

'Valued' landscape

- 4.16. With regard to whether the landscape in which the Site is located is a 'valued' landscape for the purposes of paragraph 187 of the NPPF, the LVIA applies an incorrect test, stating that "*The Site itself is not subject to a designation which would denote value and under the meaning intended of para 187a) of the NPPF, is not a 'valued landscape'.*"
- 4.17. This is the opposite of the intention within the NPPF, as established in case law by the judgement of Ouseley J², which stated in its paragraph 13 "*The Inspector, if he had concluded, however, that designation was the same as valued landscape, would have fallen into error. The NPPF is clear: that designation is used when designation is meant and valued is used when valued is meant and the two words are not the same.*"

² Stroud District Council vs. Secretary of State for Communities and Local Government [2015] EWHC 488 (Admin)

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

"A 'valued landscape' is an area identified as having sufficient landscape qualities to elevate it above other more everyday landscapes.

- 4.19. The LVIA in its Table 12.11 assesses the Site itself against the Landscape Institute's latest value criteria, as set out in its Technical Guidance Note 02/21, but this again is the incorrect approach because it only examines the Site itself and not the landscape context in which it occurs, for example its score for the natural heritage criterion is low despite the Site lying adjacent to an area of ancient semi-natural woodland that is a candidate Site of Nature Conservation Importance. The Technical Guidance Note clarifies at paragraph 2.4.5 that:

When assessing landscape value of a site as part of a planning application or appeal it is important to consider not only the site itself and its features/elements/characteristics/qualities, but also their relationship with, and the role they play within, the site's context. Value is best appreciated at the scale at which a landscape is perceived – rarely is this on a field-by-field basis.

- 4.20. I have therefore presented my own assessment of the Site and the landscape it occurs within in Table 1 below, which I assert is the correct approach.

Table 1: Assessment of the Site and its landscape context against Landscape Institute value criteria

Factor	Commentary
Natural heritage	The Site itself largely comprises arable land although it contains a number of mature native trees that are subject to Tree Preservation Orders and there is an area of tall herb vegetation in its western part and following the corridor of the public bridleway. It contains an area of woodland that forms part of The Bogs, an area of ancient semi-natural woodland and candidate SNCI. A further small area of woodland is located at the north-eastern end of the Site. The contribution to this factor is therefore high.
Cultural heritage	The Site does not contain any heritage assets, but it is adjacent to the churchyard of the Grade I Listed Church of St Mary, and it lies adjacent to an area of ancient woodland. The contribution to this factor is therefore medium.
Landscape condition	The Site represents an area of well-managed arable land. The landscape in which it is located is in good

	condition with a healthy structure and a high proportion of trees and woodland. The landscape is of sufficient intactness to be promoted by Natural England as part of the extended Surrey Hills National Landscape. The contribution to this factor is therefore high.
Associations	There are no known associations with the Site and its landscape setting.
Distinctiveness	My appraisal has revealed the Site to be strongly representative of the published character of the Greensand Valley. The Site and its setting form the outlook from the Surrey Hills National Landscape. The contribution to this factor is therefore high.
Recreational	The Site contains a public bridleway that is a key connection between Oxted and the Surrey Hills National Landscape. The surrounding landscape contains the North Downs Way National Trail and a number of Long Distance Recreational Routes. The valley slopes to the north of the Site are designated Open Access Land, and the cemetery immediately east of the Site is also publicly accessible. Master Park is a substantial public park located a short distance to the south of the Site and accessible via Public Rights of Way. The contribution to this factor is therefore high.
Perception (scenic)	The Site forms part of the outlook from the Surrey Hills National Landscape, and the hills form an attractive backdrop to views across the Site. It is at an advanced stage of consideration for inclusion within the National Landscape. The contribution to this factor is therefore high.
Perception (wildness and tranquillity)	The Site represents an area of arable land, with some woodland and tall herb vegetation. It adjoins the settlement of Oxted and there is background noise from the railway and M25 motorway, but the strongly vegetated boundaries lend it a sense of seclusion in places. The contribution to this factor is therefore medium.
Functional	The Site is largely arable, but it also contains wet woodland that provides a variety of environmental functions as part of the wider complex of The Bogs. Its boundaries provide important green infrastructure connections to the wider landscape, and the bridleway that crosses it performs an important social function enabling sustainable access to the Surrey Hills. The contribution to this function is therefore high.

4.21. Based upon the above assessment, it is my conclusion that the Site is located within a 'valued' landscape. This is supported by the promotion of this land by Natural England for the inclusion within the Surrey Hills National Landscape as follows³, which specifically names the Site (Stoney Field):

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

4.22. It is therefore my opinion that national planning policy requires this landscape to be protected and enhanced, in addition to the protections afforded to it by its location within the setting of the National Landscape.

Value of landscape receptors

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

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

4.24. Based on my assessment of the Site against established value criteria, and its important role within the setting of a National Landscape, as well as Natural England's assessment that it warrants inclusion within a nationally important landscape, I consider it to be of High value.

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

4.26. Rather confusingly with regard to this receptor, paragraph 12.4.59 of the LVIA attributes it Medium sensitivity, but in subsequent tables it is shown as having High sensitivity. I consider the latter score to be the correct one. Furthermore, the Appellant inconsistently applies their own methodology in their Tables 12.13 and 12.15, combining

³ Statutory Consultation Analysis Appendix 16: Godstone Hills (CD 15.7)

High sensitivity and Low magnitude for this receptor to derive a Minor (non-significant) effect rather than a Moderate-Minor (significant) effect as their Table 12.8 suggests.

Sensitivity of landscape receptors

4.27. I am generally in agreement with the susceptibility scores given for the receptors, but as noted above, I am of the opinion that the value of certain receptors is under-stated. I therefore consider the respective sensitivity of the landscape receptors to be as follows, based upon my value assessment and the Appellant's methodology:

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

Sensitivity of visual receptors

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

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

4.30. A Low susceptibility is also applied to receptor RD02, with identical justification text used. It is important to bear in mind that Wheeler Avenue is a residential cul-de-sac and therefore the phrase "*travelling by road*" is rather misleading, implying that they would be moving at traffic speeds. Users of this highway are likely to be residents arriving at or leaving their homes and those of their neighbours or walking towards the Site. I therefore consider the susceptibility of this receptor to be Medium and as such, the overall sensitivity to be Medium.

Anticipated Landscape Effects

4.31. Whilst I am in agreement with the majority of the receptor scores, in my opinion the score of Negligible magnitude in relation to the Surrey Hills National Landscape is simply not credible. The Appellant's definition of an impact of this magnitude is:

Where the Proposed Development (or works to facilitate it) would result in very minor loss or alteration of one or more of the key elements that make up the character of the

baseline and / or the introduction of elements that may not be uncharacteristic in the particular setting.

4.32. The Site is clearly visible in the outlook from the hills, and the views from the Site towards the hills are of such value that they were cited by Natural England as one of the main reasons for the Site's inclusion within the extended National Landscape. The proposed construction of buildings up to 2.5 storeys along the public bridleway corridor means that these views will be almost entirely lost upon completion and entirely lost by Year 15, and their context fundamentally altered. This is demonstrated by the Appellant's Accurate Visualisations VP01 and VP02 (CD 1.22AI). I have reproduced extracts of the Appellant's pre- and post-development scenarios as Figures 9, 10 and 11 below for convenience.

Figure 9: View from Public Bridleway Oxted 97 to the Surrey Hills National Landscape pre-development – clear rural view



Figure 10: View from Public Bridleway Oxted 97 to the Surrey Hills National Landscape post-development year 1 – glimpsed suburban view



Figure 11: View from Public Bridleway Oxted 97 to the Surrey Hills National Landscape post-development year 15 – no view



4.33. The construction phase of the project would introduce a clearly incongruent element into the setting of the National Landscape, which would be prominent because of the inherent level of movement and noise associated with this phase. I therefore consider the magnitude of impact to be Medium, giving rise to an adverse effect of Major significance according to Table 12.8 within the Appellant's LVIA methodology.

4.34. The LVIA has applied identical significance scores for the operational phase and therefore the same disagreement remains, that the fundamental and permanent alteration of the Site's relationship with the National Landscape and its contribution to the setting would give rise to a permanent adverse effect of Major significance.

Anticipated Visual Effects

4.35. As noted above, I am of the opinion that receptors RD01 and RD02 are of Medium sensitivity, and therefore this would give rise to a Moderate adverse impact upon both receptors during the construction and operational phases according to Table 12.8 within the Appellant's LVIA methodology.

4.36. My primary concern, however, lies with views from Public Rights of Way within the Surrey Hills National Landscape, in which the Site is clearly visible and makes a notable contribution to the openness of the setting.

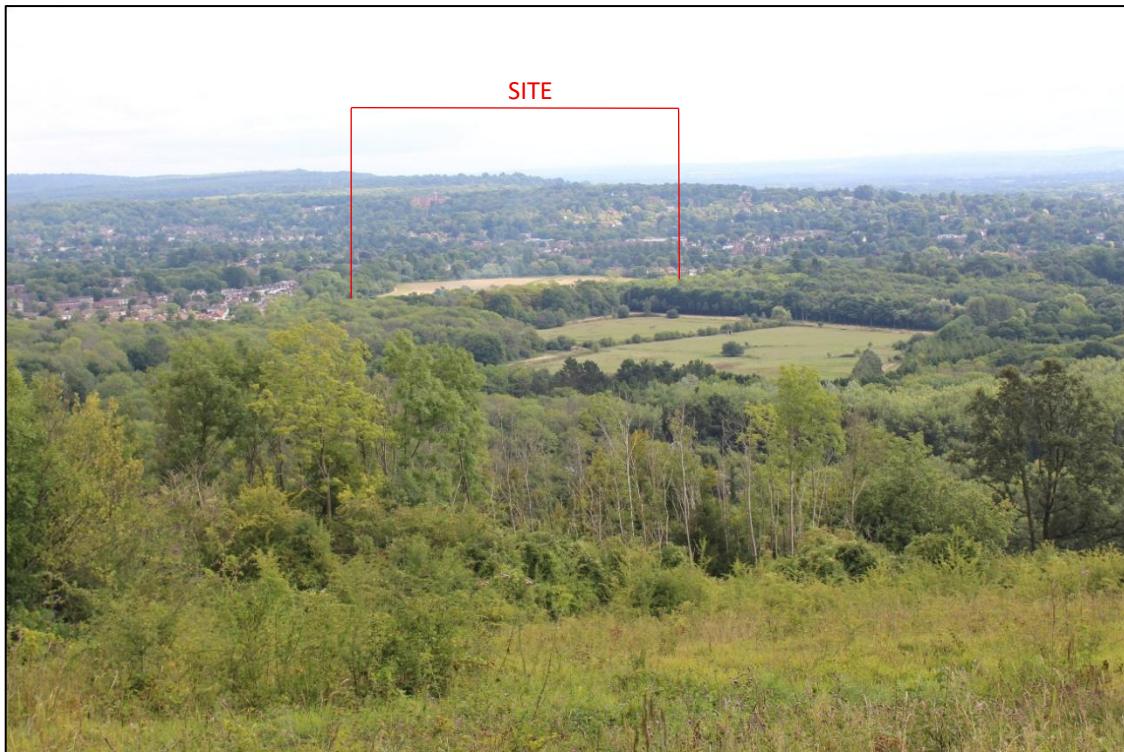
4.37. The photograph in Figure 12 below was taken by me from the viewpoint at Whistler's Steep, where a bench has been provided to enable the public to rest and enjoy the panoramic view across the Greensand Valley landscape. The public viewpoint is also located on the route of the Vanguard Way, a Long Distance Recreational Route. Given these factors, as well as its location within a nationally important landscape, I consider the view to be of the High sensitivity in accordance with the Appellant's methodology.

4.38. Similarly, the photograph in Figure 13 was taken by me from a bench location on the North Downs National Trail, at Ganger's Hill, where the Site is clearly identifiable within the view from this location. I also consider this view to be of High sensitivity.

Figure 12: View towards the Site from Whistler's Steep (Vanguard Way)



Figure 13: View towards the Site from Ganger's Hill (North Downs Way National Trail)



4.39. Given the level of visibility of the Site, I do not agree with the LVIA findings that the magnitude of impact upon this receptor during the construction and operational phases will be Negligible, which the Appellant defines as follows:

Where the effects of the Proposed Development would result in a minor variation in the view resulting from the loss or addition of features in the view and / or where the change occurs to a small proportion of the view and / or where the receptor is at such a distance that the change becomes imperceptible within the adjacent landscape context.

4.40. In my opinion, the proposed development will be clearly and prominently visible from this elevated position as demonstrated by Figures 12 and 13, and therefore the magnitude of impact is Medium, which is defined as follows:

Where the effects of the Proposed Development would result in a moderate loss or addition of features in the view and / or where the change occurs to part of a wider the view and / or where the effects of the change are experienced within the middle distance.

Where the degree of contrast between the existing and proposed conditions is noticeable in relation to the existing landscape context with regard to characteristics such as scale, mass, height, colour, etc.

4.41. This would rise to a permanent adverse effect of Major significance upon these highly sensitive views according to Table 12.8 within the Appellant's LVIA methodology. I consider this judgement to be supported by the visualisations submitted by the Applicant, which demonstrate the prominence of the scheme within this view when viewed at the correct scale.

Summary Table of Disputed Receptors

4.42. To assist the Inspector, the Tables 2 to 5 below set out the Appellant's results and my suggested results for the receptors that are in dispute across the construction and operational phases of the Appeal Scheme.

Table 2: Disputed Receptors (Construction Phase) – Appellant Results

Receptor	Sensitivity	Residual Magnitude	Effect Significance
The Site	Medium	High	Major adverse
Surrey Hills National Landscape	High	Negligible	Negligible
PR03 – users of footpaths in the National Landscape	High	Negligible	Negligible
RD01 - Users of Barrow Green Road and Chalkpit Lane	Low	Medium	Minor adverse
RD02 - Users of Wheeler Avenue	Low	Medium	Minor adverse

Table 3: Disputed Receptors (Construction Phase) – Council Results

Receptor	Sensitivity	Residual Magnitude	Effect Significance
The Site	High	High	Major adverse
Surrey Hills National Landscape	High	Medium	Major adverse
PR03 – users of footpaths in the National Landscape	High	Medium	Major adverse
RD01 - Users of Barrow Green Road and Chalkpit Lane	Medium	Medium	Moderate adverse
RD02 - Users of Wheeler Avenue	Medium	Medium	Moderate adverse

Table 4: Disputed Receptors (Operational Phase) – Appellant Results

Receptor	Sensitivity	Residual Magnitude	Effect Significance
The Site	Medium	High	Major adverse
Surrey Hills National Landscape	High	Negligible	Negligible
PR03 – users of footpaths in the National Landscape	High	Negligible	Negligible
RD01 - Users of Barrow Green Road and Chalkpit Lane	Low	Medium	Minor adverse
RD02 - Users of Wheeler Avenue	Low	Medium	Minor adverse

Table 5: Disputed Receptors (Operational Phase) – Council Results

Receptor	Sensitivity	Residual Magnitude	Effect Significance
The Site	High	High	Major adverse
Surrey Hills National Landscape	High	Medium	Major adverse
PR03 – users of footpaths in the National Landscape	High	Medium	Major adverse
RD01 - Users of Barrow Green Road and Chalkpit Lane	Medium	Medium	Moderate adverse
RD02 - Users of Wheeler Avenue	Medium	Medium	Moderate adverse

5. SUMMARY AND CONCLUSION

Baseline Context

- 5.1. The Site comprises an area of open arable land with some tall herb vegetation and two areas of woodland. The western area of woodland is part of The Bogs, which mostly comprises ancient semi-natural wet woodland. The Site is well used by the public, with a public bridleway running through it and a desire line path around its perimeter. It adjoins the town of Oxted, although strong vegetation on its boundaries limits the degree of perception between the Site and settlement.
- 5.2. The Site occupies a highly sensitive location, being located within the setting of the Surrey Hills National Landscape. Having undertaken an appraisal in accordance with the Landscape Institute guidance, I consider the Site to be located within a 'valued' landscape on account of its inherent qualities, which elevate it above most landscapes, and it is at an advanced stage of consideration for inclusion within the National Landscape. The Appellant has incorrectly determined that the Site is not located within a 'valued landscape' because it is not designated, which is contrary to established case law.
- 5.3. In terms of the published context, my appraisal has revealed the Site and its setting to be strongly representative of the published character of the Greensand Valley Landscape Type and the Merstham to Clacket Lane Greensand Valley Character Area. Furthermore, the Site and its setting represent all but two of the key positive attributes of this landscape that are not precluded by geography.

Appeal Scheme

- 5.4. The Appeal Scheme comprises an outline planning application for up to 190 residential dwellings, an 80-bed residential care home and associated infrastructure.
- 5.5. Submitted parameter plans show the development arranged in three parcels, with the northernmost parcels accessed from Barrow Green Road and the southern parcel from Wheeler Avenue. Narrow corridors of green infrastructure divide the parcels, and a more substantial area provides an offset from The Bogs. Building heights are up to 14m in the central and northern area, accounting for 'construction tolerance', and 12m across the rest of the Site.
- 5.6. The Appellant has also submitted illustrative design information that shows the public bridleway passing through an urbanised corridor of approximately 10m width, flanked by 2.5 storey residential dwellings. Visualisations show that views towards the National Landscape, which are recognised by Natural England as a key positive feature, would be entirely lost by year 15.

Landscape Effects

- 5.7. The Appellant has considered effects upon the following landscape receptors:
- The Site
 - Trees and vegetation within the Site and on its boundaries (including The Bogs)
 - Areas of LCA GV4 outwith the Surrey Hills AONB
 - The Surrey Hills AONB
- 5.8. In my opinion, considering the baseline context, the Appellant has underestimated both the sensitivity of certain receptors, and the magnitude of effect upon them.
- 5.9. In particular, I find the Appellant's judgement that the construction of 190 dwellings and a large care facility within the setting of the National Landscape will result in a Negligible magnitude of effect simply not credible, and not consistent with their own methodology. In my opinion the magnitude of effect would be Medium, giving rise to a significant adverse effect of Major significance upon this nationally important landscape.
- 5.10. I therefore conclude that the Appeal Scheme will result in permanent significant adverse effects upon the following receptors:
- The Site
 - Areas of LCA GV4 outwith the Surrey Hills AONB
 - The Surrey Hills AONB
- 5.11. In my original consultation response to the planning application, I recommended that the scheme be refused on landscape grounds on account of these significant effects, and I remain of this opinion.

Visual Effects

- 5.12. The Appellant has determined that the Appeal Scheme will result in permanent residual significant adverse effects upon the following visual receptors:
- Users of Public Bridleway 97
 - Visitors to Oxted Burial Ground
 - Residents of properties on Wheeler Avenue
- 5.13. With regard to the users of nationally promoted Public Rights of Way within the Surrey Hills National Landscape, the Appellant has judged these to experience visual effects of Negligible magnitude during the construction and operational phases, despite providing evidence that the Site and proposed structures are clearly visible from these routes. In my opinion, this is inconsistent with their assessment methodology, which suggests that the effects should be of Medium magnitude, giving rise to adverse effects of Major significance upon these highly sensitive receptors.

5.14. In my original consultation response to the planning application, I recommended that the scheme be refused on visual grounds on account of these significant effects, and I remain of this opinion.

Conclusion

5.15. The Appeal Scheme would result in significant adverse effects upon a range of landscape and visual receptors in the long term, including the Surrey Hills National Landscape and people seeking a recreational experience within it.

5.16. As such, it would fail to satisfy national and local planning policy in relation to this nationally important landscape, to the valued landscape in which the Site is located, and to the amenity of those seeking a recreational experience in the countryside.

5.17. My evidence therefore supports the Council's second, third and eighth reasons for refusing planning permission.