

Date: 14 August 2025
Our ref: 521914
Your ref: 2025/245



FAO: Cliff Thurlow
Tandridge District Council

BY EMAIL ONLY

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Dear Mr Thurlow

Planning consultation: Outline application for a residential development of up to 190 dwellings, an extra care facility with up to up 80 beds and associated works

Location: Land South Of, Barrow Green Road, Oxted

Thank you for your consultation on the above dated 28th June 2025, which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON PROTECTED LANDSCAPES

As submitted, the application could have potential significant effects on Surrey Hills National Landscape. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

The following information is required:

- A revised landscape masterplan to address our concerns as set out further on within this letter – including addressing LURA duties, the site layout and open space provision.

Without this information, Natural England may need to object to the proposal.

Please re-consult Natural England once this information has been obtained.

Natural England's further advice on designated landscapes and advice on other issues is set out below.

Additional Information required regarding Protected Landscapes

The above planning application site (hereafter referred to as 'the Site') lies within 1km of the existing Surrey Hills National Landscape (formally known as AONBs) and within the proposed extension

area to the existing NL as part of the Surrey Hills AONB Boundary Review project.

Natural England have reviewed the application and undertook a site visit on the 7th August 2025.

Natural England would like to comment on the following issues which relate to landscape:

- Whether or not the proposed development would spoil the setting of the Surrey Hills National Landscape by harming public views towards the National Landscape and impact on the rural character of the Site and landscape to the northeast.
- The relevance of Section 245 of the Levelling up and regeneration Act 2023 which places a duty upon the Council as Planning that it must “seek to further the purpose” of conserving and enhancing natural beauty of the National Landscape.
- The relevance and weight to be given to Natural England’s proposals to extend the Surrey Hills to include the Site.
- Whether or not the proposed development and landscaping suitably responds to recommendations set out in the Surrey Landscape Character Assessment.

These are discussed in further detail below however Natural England would advise that great weight is given to the advice provided by the Surrey Hills AONB Board regarding this application. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB’s statutory management plan, gives them valuable knowledge of the area.

Setting of existing Surrey Hills National Landscape

Paragraph 189 of the NPPF states that development in the settings of National Landscapes should be sensitively located and designed to avoid or minimise impacts on the designated areas. An assessment of the landscape and visual impacts of the proposal on this area should therefore be undertaken, with opportunities taken to avoid or minimise impacts on the landscape and secure enhancement opportunities. Any development should reflect or enhance the intrinsic character and natural beauty of the area and be in line with relevant development plan policies.

The current Surrey Hills AONB Management Plan 2020-2025 includes the following relevant policy “Policy P6. Development that would spoil the setting of the of the AONB by harming public views into or from the AONB will be resisted.”

The Site falls within the Greensand Valley landscape type within the Surrey Landscape Character Assessment. The assessment notes that “views across pastures to wooded hills of North Downs to the north and Greensand hills to south” are a key positive landscape attribute of the character area. These views towards the Surrey Hills National Landscape are prominent from the public right of way which crosses the Site.

Natural England acknowledges the submission of an LVIA and accurate visualisations of the proposed development. The visualisations provide a useful impression of the visual impact on the proposed development on the setting to the National Landscape. The visualisations from the bridleway which crosses the Site illustrate the change to public views towards the National Landscape which would be significant. Views to the north west, towards the National Landscape, are currently open and unspoilt and the wooded ridge and unsettled lower slopes are a prominent feature in the views. These views contribute to the sense of being beyond the settlement edge and part of the wider landscape which makes up the setting to the National Landscape. The proposed development would disrupt these views significantly with only a small, narrow views of the wider countryside possible and framed by residential development.

LURA Duty

Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities in exercising or performing any functions in relation to, or so as to affect, land in an Area of Outstanding Natural Beauty (“National Landscape”) in England, to seek to further the statutory purposes of the area. The duty applies to local planning authorities and other decision makers in preparing development plans, making planning decisions on development and infrastructure proposals, as well as to other public bodies and statutory undertakers in undertaking their functions.

Defra have released ‘ [Guidance for relevant authorities on seeking to further the purposes of Protected Landscapes](#)’ (December 2024) and, in accordance with that guidance, Natural England advises that:

- the duty to ‘seek to further’ is an active duty, not a passive one. Any relevant authority must take all reasonable steps to explore how the statutory purposes of the Protected Landscape (National Park, the Broads, or a National Landscape (AONB)) can be furthered;
- The new duty underlines the importance of avoiding harm to the statutory purposes of a Protected Landscape and also to seek to further the conservation and enhancement of a Protected Landscape. That goes beyond mitigation and like for like measures and replacement. A relevant authority must be able to demonstrate with proportionate, reasoned and documented evidence what measures can be taken to further the statutory purpose;
- The proposed measures to further the statutory purposes of a Protected Landscape, should explore what is possible in addition to avoiding the effects of the development, and should be appropriate, proportionate to the type and scale of the development and its implications for the area and effectively secured. Natural England’s view is that the proposed measures should align with and help to deliver the aims and objectives of the - Protected Landscape’s statutory management plan, which is reinforced in the Defra guidance. The relevant Protected Landscape team/body should be consulted.

Proposed boundary extension

The proposed development is located within an area which Natural England has assessed as meeting the criterion for designation as a National Landscape (referred to in legislation as an Area of Outstanding Natural Beauty (AONB)), (known as a Proposed Boundary Extension Area), and may be included within a boundary variation to the Surrey Hills National Landscape. Whilst this assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a material consideration in the determination of the proposal. Natural England considers the Surrey Hills to be a valued landscape in line with paragraph 187 of the National Planning Policy Framework (NPPF).

An extension to an existing National Landscape is formally designated once a variation Order, made by Natural England, is confirmed by the Defra Secretary of State. Following the issuing of the designation Order by Natural England, but prior to confirmation by the Secretary of State, any area that is subject to a variation Order would carry great weight as a material consideration in planning decisions.

The Site and wider landscape to the north west were identified as meeting the Natural Beauty criteria, known as a candidate area, within the Natural Beauty Assessment and falls within Evaluation Area 10a. It is important to note that the assessment of Natural Beauty is not taken on a field by field basis however factors which contribute to the natural beauty of the qualifying area, and which are of relevant to the Site include (set out in more detail on pages 143-144 of the Natural Beauty Report):

- More undulating landform and a relatively small scale and intricate landscape pattern

- Extensive areas of woodland
- Unusual natural wetland landscape known as the 'The Bog's' (which lies to the immediate west of the Site)
- The landscape in this area blends seamlessly with the North Downs to the north.
- Local views are typically enclosed, such that the influence of road and built infrastructure is limited.

During the second consultation on the proposals to extend the boundary of the Surrey Hills, Natural England received representations related to the Site and requesting an alternative boundary to exclude the area from the proposals. Natural England subsequently reviewed this area and concluded to maintain the proposals in this area and including within the proposed extension area. Reasoning is set out in more detail in the Analysis Report for the second consultation (pages 13-15). At the time of writing the analysis report a Scoping Opinion had been sought for development of the Site comprising 140 dwellings and an 80-unit care home (Planning Application 2024/956/EIA). Upon review, Natural England noted the Scoping report highlighted sensitive views from the Site to the Church and Scarp, AONB and proximity to the Bog's. These qualities contribute to the natural beauty of the area as a whole.

Natural England Guidance for Assessing Landscapes for designation as National Park or Area of Outstanding Natural Beauty in England states that land which is allocated for development or has planning permission at the margins of the AONB should normally be excluded. If this planning application were to be approved, Natural England would need to review the proposals to extend the boundary in this area in light of this decision.

The proposed development and recommendations within the Surrey Landscape Character Assessment (LCA)

While we welcome that the landscape strategy as submitted sets out some landscape mitigation on the site, it is Natural England's view that more is required in line with the recommendations set out in the LCA. Our advice is that the current proposals are not suitable for the site, being that it is within the setting of the National Landscape and the LURA duty is an active rather than passive one in "seeking to further" the statutory purposes of a National Landscape.

The LCA recommends conserving the rural character of the area, therefore we would suggest consideration is given to the residential development area being reduced and pulled back from the boundaries further. This would allow for enhanced landscape mitigation and to minimise effects of the proposals from the surrounding area. Pulling back from the Public Right of Way (PRoW) which crosses the site would also allow for more open views to the North Downs ridge which is noted as a key feature within the LCA.

The LCA notes there is an opportunity to enhance woodland and hedgerows within this landscape type. There is some new woodland proposed, particularly along the western edge but it would be good to see more substantial areas of new planting within the proposals.

We would suggest that more mature trees should be specified as this would be important, particularly along the northern edge and public right of way to have more of an immediate effect and filter views of the development.

If you have any queries relating to the advice in this letter please contact me on 0208 026 3893.

Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would be happy to provide advice through our [Discretionary Advice Service](#).

Please consult us again once the information requested above, has been provided.

Yours sincerely,

Piotr Behnke
Higher Officer
Thames Solent Team