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Summary Proof of Evidence Landscape, Visual and Green Belt Matters

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LPA REF: TA//2023/1281

Appeal Ref - APP/M3645/W/25/3374913

Client

Nutfield Park Developments Limited (Ltd)

Project

Former Laporte Works Site , Nutfield Road, Nutfield, Surrey

Date

11 February 2026

1.0 SUMMARY PROOF OF EVIDENCE

Introduction and scope of evidence

- 1.1 The site lies to the north side of Nutfield village east of Redhill, Surrey. The site covers an area of 58.8ha. South of the site Nutfield village is a relatively linear settlement, with some development in depth, along the A25 mainly to the western end of the settlement.

The Development

- 1.2 The proposed residential development has been designed to form a sympathetic addition to Nutfield. This has involved looking at which parts of the site would provide appropriate opportunities for built development, and which parts of the site should be retained and enhanced for Green Infrastructure. The more open and visually exposed northern slopes have been kept free from built development.
- 1.3 The development provides circa 52 hectares of land dedicated to landscape, GI, public open space, play and habitat related proposals - representing approximately 88% of the total site area.

Landscape Effects

- 1.4 At a national level, the site lies within National Character Area 120 'Wealden Greensands'. The Development is modest in scale and nature, responding to its context and would have a Negligible effect on the wider National Character Area.
- 1.5 At a District level, the site lies within the District Landscape character area UE9: Holmthorpe Pits and Mercer's Park.
- 1.6 Overall, the new development will occupy only a small area of land within the LCA UE9 located in the visually contained areas of the LCA - the nature of the surrounding woodland restricts the visual envelope of the site limiting its potential influence on the neighbouring landscape.
- 1.7 It is considered that the resultant landscape effects upon the UE9 LCA would be Moderate to Minor Adverse upon completion (year 1) reducing to Minor Adverse after 15 years.
- 1.8 In terms of the effects on the Site and Immediate Context, the new housing within the southern sections of the site will change the existing settlement edge character to that of new built form set within the woodland context. New landscaping proposals adjacent to the new housing including along Nutfield Road and near Church Hill will help soften the new proposals.
- 1.9 Over time new planting will mature to help soften the new built form and earthworks resulting in a development that will be well assimilated within its context. Adverse effects will be linked predominantly to the southern sections of the site whilst proposals within the northern sections of the site will result in beneficial effects overall due to an increase in biodiversity and recreational assets.
- 1.10 Landscape effects upon the site and its immediate context are considered to be Moderate Adverse from completion reducing overtime to Moderate / Minor Adverse after 15 years.

Effect on the form and character of Nutfield.

- 1.11 Overall whilst the settlement generally has a linear form, and development is narrow towards the east, there is more development in depth to the west. The appeal scheme would continue

this character, with a block of development to the west, which would be experienced when passing through Nutfield. The central area of housing is set within woodland, north of the existing housing and would not be perceived travelling through the village, only from by the paths within the site itself. The Integrated Retirement complex lies to the east, again within a woodland parcel. Whilst elements of built form may be visible from the surrounding roads such as Church Hill, these would heavily filtered by the woodland that surrounds the site and would not have a notable effect on how the settlement is experienced.

Surrey Hills National Landscape

- 1.12 The distance and high degree of screening of the built form within the scheme, means that there would be no harm to the Special Qualities of the National Landscape arising from the scheme.
- 1.13 There is no harm alleged to the National Landscape in the reason for refusal, or the officers report for Committee.

Visual effects

- 1.14 There are relatively few locations where views from properties are likely to experience change arising from the Proposed Development. The residents with most direct effects of the proposals would be residents within dwellings located directly adjacent to the site where residential development is proposed close to the site boundaries.
- 1.15 Users of ProW routes that pass through the site within the immediate vicinity of the proposed residential areas will experience the greatest visual effects. Views that are currently of the woodland context will change to include new built form including housing, road infrastructure new surfaced paths, changes in landform and new landscaped areas. New landscaping proposals within the development areas will provide some visual softening to differing degrees along the routes as plants mature generally allowing for reduction in effects overtime.
- 1.16 Whilst different to the views within the woodland to the south, a range of new routes in the landscape areas to the north will offer recreational and visual benefits for users which needs to be weighed in the balance with the adverse visual effects arising over the shorter sections of routes near the proposed built form.

Green Belt

- 1.17 The NPPF (December 2024) set out a number of changes to Green Belt with the introduction of the concept of grey belt. Grey belt land being that which does not strongly contribute to Green Belt Purposes a, b and d and where the application of the policies relating to the areas or assets in footnote 7 of the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development. An assessment of the role of the site makes against Green Belt purposes, a, b and d. has been completed and is set out below.

Green Belt Purpose	Contribution to purpose
Purpose a) to check the unrestricted sprawl of large built-up areas	No contribution
Green Belt Purpose b) to prevent neighbouring towns merging into one another	Weak/No contribution
Green Belt Purpose d) to preserve the setting and special character of historic towns	No contribution

1.18 Consideration of the site's contribution to Green Belt Purposes (a), (b) and (d) is considered alongside the other relevant planning factors, to determine whether the site could be considered as "grey belt" within the Planning Proof of Evidence produced by Richard Henley.

1.19 The council agree within the Statement of Common Ground at Paragraph 6.27 that "*The site accords with the NPPF Glossary definition of grey belt.*"

Whether the development would "not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan" NPPF para 155

1.20 Paragraph 155 of the NPPF December 2024 follows Paragraph 154 which sets out the range of exceptions to inappropriate development in the Green Belt. Paragraph 155 states:

'The development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply (not all are repeated below):

a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan....'(my emboldening)

1.21 The paragraph goes on to identify other criteria to consider and taken together a judgement is then reached on whether the development would not be inappropriate in the Green Belt. This is covered in the Planning Proof of Evidence, produced by Richard Henley.

1.22 The analysis of the role of the site against Green Belt Purposes a, b and d shows that the site makes a weak or no contribution to these purposes. The development only takes up a small part of the wider site, and is largely contained by existing woodland, so the harms to purposes arising from the development are even more limited.

1.23 In terms of Green Belt purpose c, encroachment on the countryside, the development forms part of an area of disturbed but regenerating land. The scheme would only involve built development at very specific parcels of land, contained by existing woodland and settlement. The visual effects on the wider area would be very limited, and the existing character of wider countryside beyond the site boundaries would be minimally affected. Inevitably there would be a degree of encroachment on the land used for the built development itself, but the perception of encroachment on the countryside on any wider area would be negligible.

1.24 In Tandridge approximately 94% of the District is Green Belt (Core strategy paragraph 2.2). The development on approximately 7ha of land from a District that covers 24,831ha, with 23,299 ha of Green Belt amounts to less than 0.03% of the total Green Belt area. This loss, with a very limited effect beyond the developed parts of the appeal site itself, cannot possibly “fundamentally undermine” the purpose of safeguarding the countryside from encroachment, across the remaining area of the plan. The PPG at paragraph 64-008-20250225, notes that the judgment has to consider if the development “*would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way.*”

1.25 Green Belt purpose e is to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. The site has been previously worked for minerals but is now restored and regenerating. This is general purpose and the purpose would apply equally to any development outside existing urban land. The development of this scheme would not fundamentally undermine this purpose across the area of the plan.

Overall conclusions on the effect on NPPF 155a

1.26 Taken together, the development would not fundamentally undermine the purposes of the remaining Green Belt across the area of the plan.

Green Belt Openness

1.27 In is the appellants case that the development would not be inappropriate development in the Green Belt, and as such the openness of the Green Belt is not a relevant consideration, as per relevant case law, footnote 55 of the NPPF and para 64-014-20250225 of the PPG .

1.28 However, it is the council's case is that the development would be inappropriate. Should the inspector concur with that view, a consideration of openness would be required.

Effects of the scheme on the Openness of the Green Belt

1.29 The Planning Practice Guidance (PPG) notes that openness is capable of having both spatial and visual aspects.

1.30 In terms of spatial openness, the scheme would involve the change of 58.8ha ha of former landfill/ mineral extraction land to built development and green infrastructure. The developed part of the site would be approximately 7 ha. By definition, any new built development on currently open land, would lead to a significant effect on spatial openness, on the directly affected parts of the site.

1.31 The assessment of “*Visual Openness*” draws on the landscape and visual appraisal. This has demonstrated the limited extent from which the proposed development would be visible. Overall, it is considered that the effects on visual openness arising from the scheme would be very limited.

Improvements to Green Space

1.32 Paragraph 156 of the NPPF sets out that where major development involving the provision of housing is proposed on sites in the Green Belt subject to a planning application, a range of the contributions (‘Golden Rules’) should be made. NPPF 156(c) notes these include new, or improvements to existing, green spaces that are accessible to the public.

- 1.33 At present there is public access to parts of the site, via the network of public footpaths. There is also some informal access to parts of the site, however this is not authorised, and its continued availability is not guaranteed.
- 1.34 The development proposed includes extensive landscape and ecological enhancements to the wider site, beyond the 7ha identified for built development. This includes diversifying the grassland areas, new woodland and scrub planting and new water features associated with the sustainable drainage of the site. In addition, new public access routes would be provided, some with new surfacing, enhancing access for wider proportion of the population, details of this would be agreed at Reserved Matters stage.
- 1.35 This would not just benefit the new residents associated with the development but would be of benefit to the wider Nutfield population. The development would clearly meet the requirements of NPPF paragraph 156 c.

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