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Proof of Evidence (Including Summary) Landscape, Visual and Green Belt Matters

Gary Holliday BA (Hons), M Phil, FLI

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

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1.0 INTRODUCTION

- 1.1 My name is Michael Gary Holliday. I have a BA (Hons) degree and a Master of Philosophy degree (MPhil) in Landscape Design from Newcastle University. I am a Fellow of the Landscape Institute and a Director in FPCR Environment and Design Ltd. I have been a partner/director of the practice for over 25 years and have over 37 years' experience of landscape and development projects from initial conceptual design through to final completion and long-term aftercare. I am a Professional Practice Assessor and a member of the Membership Admission Panel on behalf of the Landscape Institute. I am also a registered Assessor with Building with Nature (BwN) which is an initiative originally developed by the Gloucestershire Wildlife Trust to raise the standard of multifunctional Green Infrastructure.
- 1.2 I have been involved with the appeal site since May 2022 when my firm was first asked to advise on landscape, Green Belt, ecology and arboriculture matters in relation to the Site. FPCR produced the Landscape and Visual Appraisal (LVA) accompanying the application, and the landscape plan. I was involved in the early stages of scheme development as part of the wider team, identifying which parts of the site could accommodate sensitive development.
- 1.3 The site lies to the north side of Nutfield village east of Redhill, Surrey. The site covers an area of 58.8 broadly extending north to Nutfield Marsh Road, east to Church Hill and west to Nutfield Cemetery.
- 1.4 The application seeks Outline planning permission for the development of the site for new homes (Use Class C3) and Integrated Retirement Community (IRC) (Use Classes C2, E(e), F2), creation of new access, landscaping and associated works to facilitate the development, in phases which are severable (Outline with all matters reserved, except for Access).
- 1.5 The evidence which I have prepared and provide for this appeal reference is true and has been prepared and is given in accordance with guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions irrespective of by whom I am instructed.

2.0 BACKGROUND AND CONTEXT

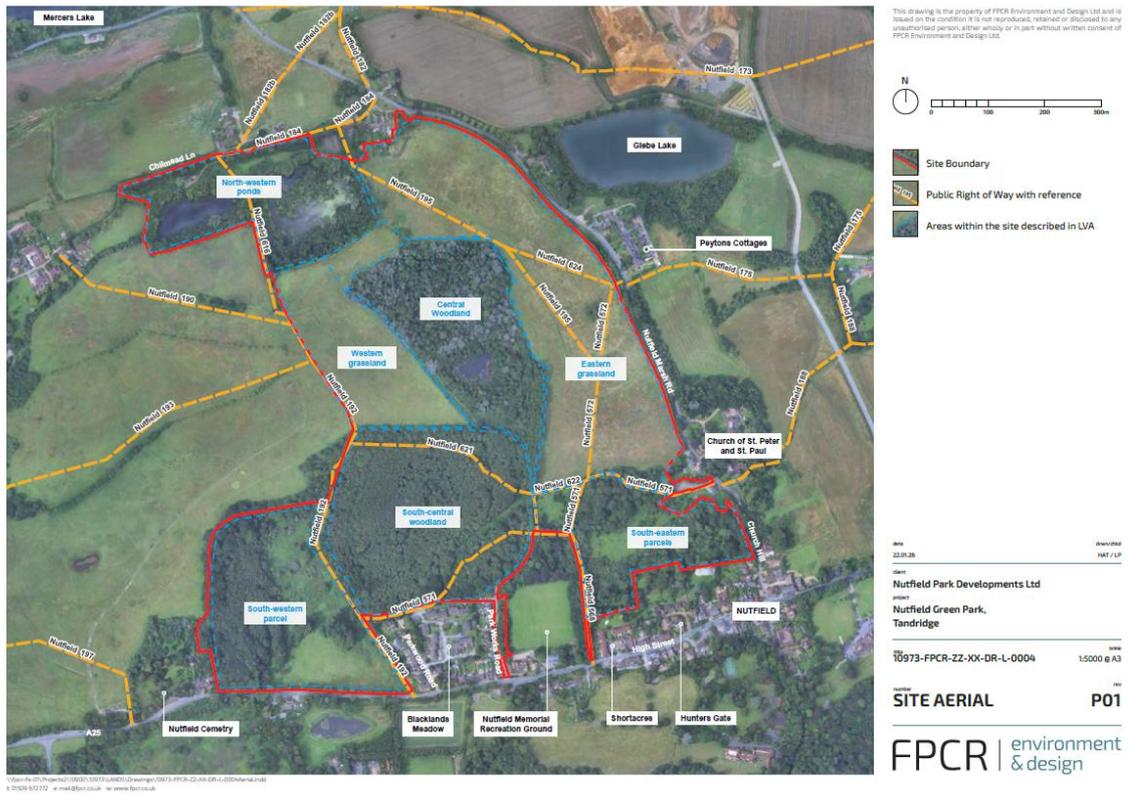
The Planning Application

- 2.1 The appeal scheme has been developed in response to the constraints and opportunities presented by the site. These include its landscape and settlement context.
- 2.2 The application was submitted by Nutfield Park Developments Ltd, to Tandridge District Council and was validated on 27 October 2023.
- 2.3 The application was refused with a notice dated 3 October 2025. As part of the decision notice there were two reasons for refusal (RfR). Reason for refusal 1 is relevant to landscape matters and is repeated in full below. My Proof of evidence addresses issues raised in this reason for refusal.
- 2.4 Reason for refusal 1, is repeated in full below
- The proposed development would constitute inappropriate development in the Green Belt causing significant harm to the openness and harm to the visual amenities of the Green Belt. The proposal would not comply with the requirements of paragraphs 155 and 156 of the National Planning Policy Framework (2024) as the development would not be in a sustainable location and necessary improvements would not be made to local infrastructure to cater for the needs of the occupiers of the new development. No very special circumstances exist, either individually or cumulatively, to clearly outweigh the harm by reasons of inappropriateness and other identified harm. As such, the proposal is contrary to the provisions of Policies DP10 and DP13 of the Tandridge Local Plan Part 2: Detailed Policies and the provisions of the National Planning Policy Framework (2024) as a whole.*
- 2.5 My Proof of evidence addresses landscape and visual amenity, and the effect on the purposes of the Green Belt, and Green Belt openness. Wider Green Belt issues and conformity with Green Belt policy is covered in the proof of evidence of Richard Henley.
- 2.6 Reason for refusal 2 covered heritage matters and is covered in the proof of evidence of Andrew Josephs.

3.0 THE PROPOSED SITE – LOCAL CONTEXT AND CHARACTER

The site and context

3.1 The site is formed by a series of irregular shaped parcels of land located north and west of Nutfield village. The site has been subject to historic quarry activities resulting in a site that has a variety of separate distinct areas. A variety of different landscape features are present within the site including: a mix of woodland types occupies approximately 48% (28ha) of the site; approximately 36% (21ha) of the site is currently occupied by grassland; and approximately 2.82 ha is existing ponds. The site comprises a number of different areas as shown on the annotated aerial photograph below (and at full size at Appendix 1) and described in the following section.



3.2 South-western parcel:



3.3 This parcel largely comprises relatively unmanaged grassland and woodland. The south-eastern section of the parcel is predominantly grassland bounded by hedgerow and trees to its southern edge onto Nutfield Road. A small tree group separates this more open grassland from an area of grassland with scattered trees and scrub. West of the grassed sections and area of relatively young woodland progresses to more mature broadleaved woodland that forms the western and northern edge of the parcel.

3.4 South-central woodland:



3.5 This parcel comprises woodland located on an area of disused workings related to historic quarry workings. The remnants of old access routes for the workings remain within the woodland with the PRow footpath NTF 571 broadly following this route on a south-west / north-east axis. The parcel is bounded to the south by dwellings off Blacklands Meadow that back onto the sites mature broadleaved woodland. The broadleaved woodland wraps around the southern, west and north of this parcel. With the central area being secondary woodland comprising predominantly birch trees. This secondary woodland is located within a sunken area

related to previous quarry workings which is more wet than the outer raised edge. PRow NTF 192 continues north along the western edge of this parcel intersecting with PRow NTF 621 which follows the remains of an access track leading east across the northern extent of this area of the site.

3.6 South-eastern parcels:



- 3.7 An area of more open land is located east of the south-central woodland. It is an area of grassy scrub with some individual trees. Paths run around the area and more informal paths criss-crosses this area. East of the open scrub area, the remaining south-eastern area of the site comprises an area of grassland surrounded by broadleaved woodland. This parcel is understood to have been utilised as a previous quarry function. PRow NTF 568 runs along the west of this parcel leading to land further north within the site. NTF 571 skirts around the northern edge of the parcel and leads onto Church Hill passing through an area within the site laid to gravel utilised informally as a parking area for the nearby church.

3.8 Western grassland:



- 3.9 This grassland slopes down to the north and include the NTF 192 to its west. The grassland area is contained to its east by woodland but open to its west and north allowing long range views across the wider landscape context.

3.10 Central Woodland:



The parcel within the centre of the northern section of the site comprises a mix of secondary woodland to its south and broadleaved woodland to the north. Centrally within this parcel lies a small pond in an open glade.

3.11 Eastern grassland:



3.12 The eastern parcel of the site slope north and east down to Nutfield Marsh Road. It comprises an area of predominantly low quality grassland with a small number of individual trees located within it. PRoW NTF 572 leads north-east from the south-eastern parcels to exit onto Nutfield Marsh Road. This PRoW connects with NTF 624 which also joins Nutfield Marsh Road at the

same access point. NTF 624 then joins with NTF 195 which leads north-west from NTF 572 to pass between residential properties and the Inn on the Pond public house to link with Chillmead Lane.

3.13 North-western ponds:



The north-western corner of the site comprises two large ponds. The PRoW NTF192 passes between these ponds. The pond to the west of the PRoW is utilised for recreational fishing whilst the pond to the east is inaccessible for recreation and is more overgrown with vegetation and trees creating a biodiverse feature within the site. Trees and vegetation surround the ponds and links to more trees along Chillmead Lane containing an area utilised as a carpark.

- 3.14 People currently access the site via the rights of way, though some of these are overgrown and difficult to follow. There is also some informal access, not following public rights of way, but with people making their own pathways. These routes have no formal status, and the future of access is not guaranteed.

Site Context

- 3.15 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. There are three distinct areas within the parish. Nutfield Marsh is located to the north of the A25, the old village of Nutfield is situated on the ridge of the Greensand way and South Nutfield lies to the south, down from the ridge. The built form within the village of Nutfield comprises a mix of late 19th to 20th century dwellings. South of the A25 land slopes south occupied by woodland and grassed farmland with some dispersed residential properties and employment areas associated with Priory Farm. Figure 1 at Appendix 2 shows the context.
- 3.16 To the east of the site a number of residential dwellings as well as The Church of St Peter and St Paul are accessed off Church Hill and Nutfield Marsh Road. Further east lies a series of grassed fields managed as pasture. An access road leading from the A25 north to a new quarry works by Glebe Lake passes through these fields. The M23 lies approximately 700m east of the site beyond additional grassed fields and areas of woodland. A series of PRoW pass through the fields to the east of the site including NTF 175 & 188.
- 3.17 North of the site lower lying land is occupied by a number of lakes including Glebe Lake, Mercers Lake the latter being utilised as a recreational lake with water sport activities. Central within these lakes lies a green which includes the Nutfield Cricket Club Ground and is bisected by Nutfield Marsh Road. PRoW 182b also passes through the green leading to Mercers Farm

further north. This PRoW also links to NTF 182 and NTF 173 that pass through arable fields within this area. further north more water bodies are present - Spynes Mere located east of Merstham settlement. The M25 then crosses the area on an east/west axis before land slopes steeply up forming part of the Surrey Hills National Landscape.

- 3.18 West of the site is the land slopes down to Cormongers Lane. PRoW routes NTF 190, 193 & 197 lead west from the site through these pasture fields. Further west land is utilised as a landfill site to the east of Redhill. National Cycle Route 21 leads follows a route from Chillmead Lane heading west.

The Wider Landscape Context

National Character Area

- 3.19 The site lies within Natural England's National Character Area (NCA120) Wealden Greensand.
- 3.20 Under the heading Wealden Greensand today the description on the NCA webpage states:
- “Besides the woodland, the Surrey Greensand is characterised by open rolling farmland. In the south, a traditional farmscape of small fields and thick hedgerows is retained. On flatter land, however, arable use is more prevalent. This area is heavily populated with settlements such as Redhill, Reigate and Dorking. The proximity to London and the longstanding affluence of this area are reflected in the numerous notable houses, parks and gardens. This affluence continues to shape the landscape, with some of the farmland given over to smallholdings and recreational uses such as pony paddocks. In many areas, the settlements bring a suburban feel that contrasts with the essentially rural landscape of the south-western end of the NCA.”*
- 3.21 This is a very extensive area, and the description is relevant for context, but the appeal site is much more influenced by local factors.
- 3.22 The National Character Area (NCA) profile includes Statements of Environmental Opportunities (SEOs) for the Character Area. The following are of relevance:

SEO 1: Protect and manage the nationally recognised and distinctive character of the landscape, conserving and enhancing historic landscape character, tranquillity, sense of place, and the rich historical and geological heritage of the Wealden Greensand. Enhance access provision where appropriate, to maintain public benefit from and enjoyment of the area.

For example by:...

- Maintaining and enhancing rights of way and open access throughout the area, improving links especially to the North Downs Way and South Downs Way national trails, and to towns and villages. Developing new permissive access to historical sites and quality green space as part of a cohesive network of inspiring access provision. Increasing the benefits of these routes for biodiversity, health and local businesses, and ensuring full compatibility with agriculture. Enhanced access permission will not be appropriate in all instances and needs to be balanced to ensure that areas that are particularly vulnerable to disturbance from recreational pressures are not compromised.*

SEO 3: Manage and significantly enhance the quality of the characteristic wetland and water environment of the Greensand. This will contribute to sustainable flood risk management, will benefit the regulation of water quality and water availability, as well as enhancing the sense of place, biodiversity, recreation and wetland habitat adaptation to climate change.

For example by:...

- ...Maintaining and restoring the numerous manmade lakes and ponds for the benefit of biodiversity, the landscape, the historic environment and water storage, to reduce runoff and soil erosion.

“SEO 4: Plan to deliver a network of integrated, well managed green spaces in existing and developing urban areas, providing social, economic and environmental benefits, and reinforcing landscape character and local distinctiveness – particularly on or alongside the boundaries of the designated landscapes within the Wealden Greensand.”

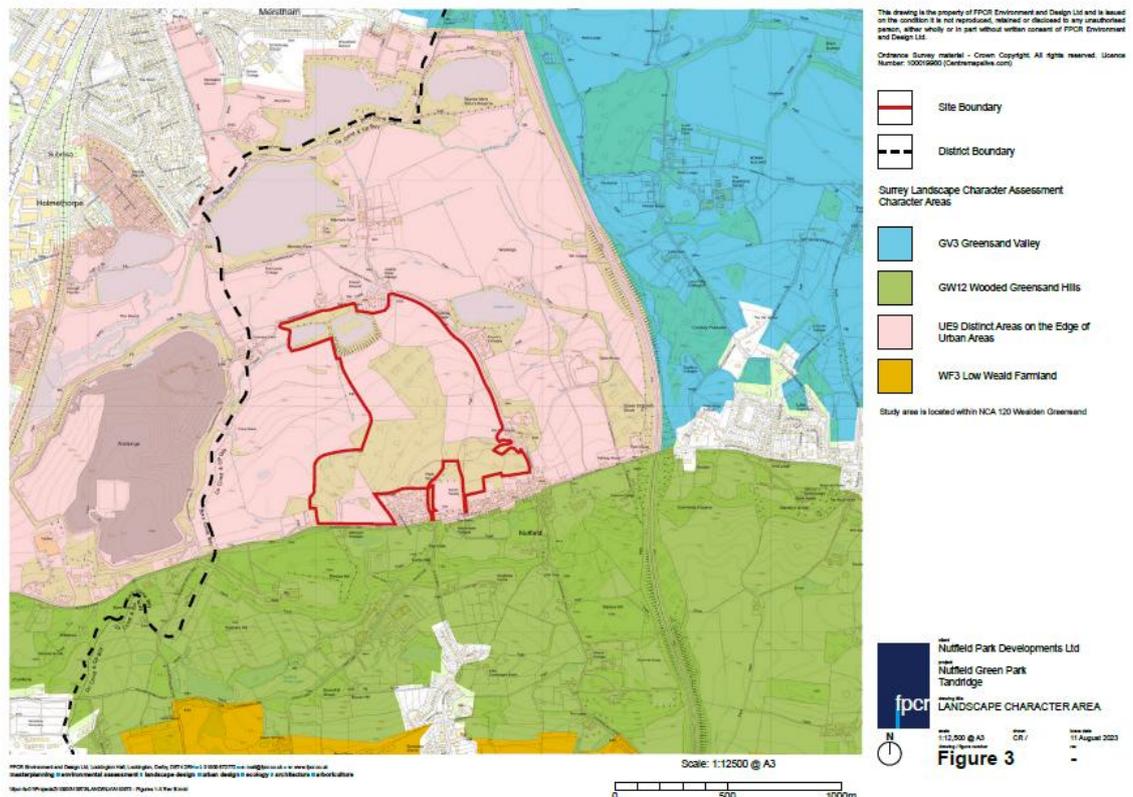
3.23 The development provides the opportunity to further some of these opportunities, such as increased public access and biodiversity enhancements.

3.24 Further details on the NCA area set out in the LVA at CD 1.28 from paragraph 4.1.

Local Landscape Character

Surrey Landscape Character Assessment, Tandridge District (2015)

3.25 The Surrey Landscape Character Assessment has been undertaken at a district level and it subdivides the landscape into twenty-one Landscape Character Types (LCT) and one hundred and forty Landscape Character Areas (LCAs). The Site is located within the LCA named, “Distinct Areas on the Edge of Urban Areas” and within the LCA UE9: “Holmthorpe Pits and Mercer’s Park”. The character areas are shown on Figure 3 Appendix 2, with an extract below.



UE9: Holmthorpe Pits and Mercer's Park

3.26 The location and boundaries of the LCA are described as follows:

"The boundary is defined by the Built Up Area of Redhill and South Merstham to the west and north, the M23 motorway to the east and the A25 road to the south. The far north-east corner of the area is within the Surrey Hills AONB."

3.27 The characteristic features of LCA Holmthorpe Pits and Mercer's Park are:

- *"Part of the wider Greensand Valley which runs broadly east-west along the southern foot of the North Downs ridge scarp slope.*
- *The original undulating landform has been significantly altered by human intervention.*
- *The land use consist of large areas quarried for sand, currently at various stages of 'restoration'. A number of pits form lakes, which provide recreation at Mercer's Park Country Park, nature reserves and a fishing lake. Areas of arable and pastoral fields are interspersed between the pits. There are some areas of wet woodland to the south on the sites of disused gravel workings.*
- *The small village of Nutfield is located along the A25 at the southern edge of the character area, and there are small areas of settlement off Nutfield Marsh Road, including a pond, an inn and a cricket ground next to Nutfield Marsh Common in the middle of the character area.*
- *Mounding and planting designed to screen quarry working enclose views in places, but elsewhere there are views across lakes and open fields with the North Downs ridge scarp glimpsed in the distance. There is intervisibility with the North Downs to the north, but the area is seen in context with the Built Up Area of Redhill to the west.*
- *The Tandridge Border Path Recreational Route crosses north-south through the middle of the character area and connects to public rights of way, increasing in number towards the south and Nutfield. Mercer's Park Country Park provides recreation within the northern part of the character area. A limited number of rural lanes cross the area. Short stretches of railway cross the western end of the character area adjacent to the built up end of Redhill.*
- *Nutfield Marsh Common is Open Access Land and registered as Common Land. The majority of the character area is designated as the Holmethorpe Sandpits Complex Site of Nature Conservation Interest, for its important bird habitats*
- *Substantial human intervention has altered the natural landform, but through wetland restoration now provides significant biodiversity and recreation opportunities. Ongoing restoration at Patteson Court landfill site will restore landform along the valley side which joins the greensand ridge of character area GW12 to the south".*

3.28 Under the heading Evaluation the LCA states *"UE9: This area coincides with Surrey's Wealden Greensand biodiversity opportunity area WG11 which is a mixture of floodplain grazing marsh, woodland and heathland."*

3.29 Landscape Guidance for the LCA includes:

- *"Conserve and enhance biodiversity value of remnant habitats, and key landscape characteristics that are identified as priority habitats.*
- *Seek opportunities to link existing habitats through habitat restoration.*

- *Protect and enhance the landscape setting to adjacent settlements and urban areas.*
- *Maintain physical links and open views to the wider landscape.*
- *Maintain and enhance the network of public access, whilst ensuring significant biodiversity value and resource of these areas is sensitively managed and protected.*
- *Encourage understanding of the biodiversity and historic elements of the landscape.*
- *Conserve the historic elements of the landscape as remnants of an older landscape."*

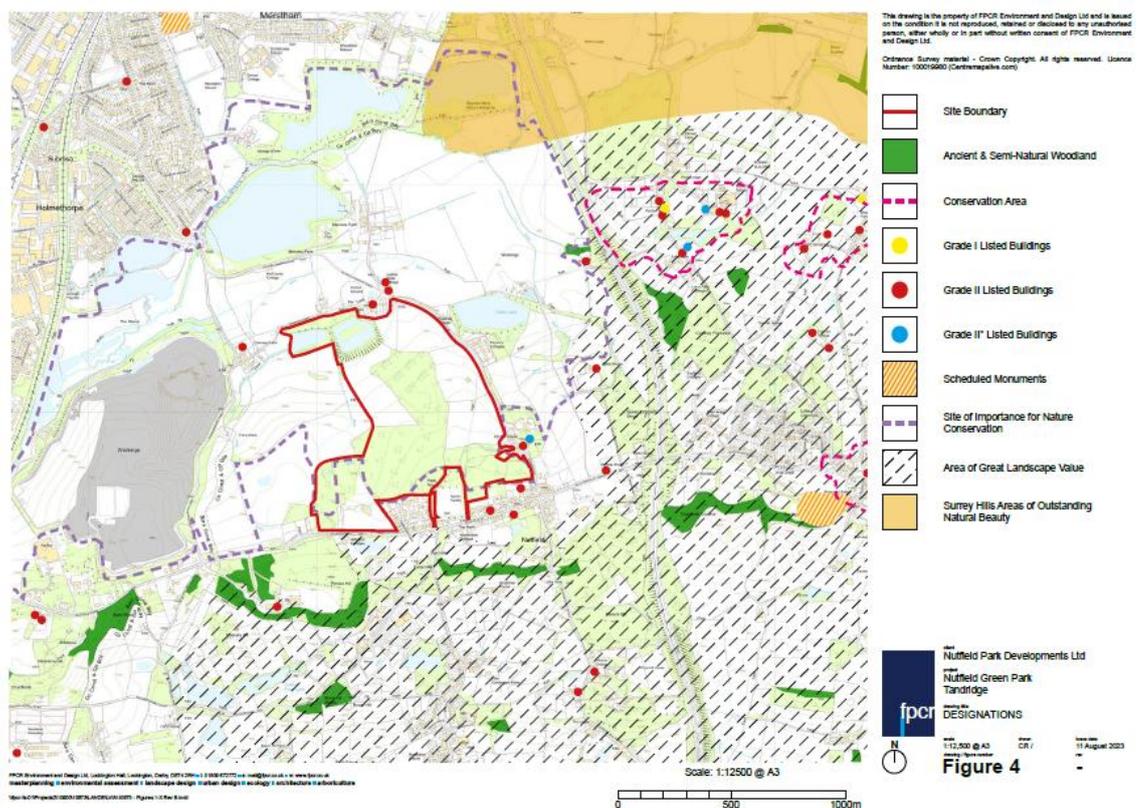
3.30 The site is assessed as typical of the wider UE9 LCA in that it is a landscape that has had history of quarry activity and has therefore been altered by human intervention falling on the ridge of the southern side of the Greensand Valley. One of the waterbodies within the north of the site is utilised for fishing and the Tandridge Border Path passes through the site.

3.31 Activities associated with quarrying such as landform changes are typical within the UE9 LCA.

3.32 South of the A25 lies LCA GW12 Earlswood to Oxted Wooded Greensand Hills as shown on Figure 3 Appendix 2. This a predominantly wooded area interspersed with medium sized fields. The description notes limited settlement within the eastern half of the character area. The western half is described as containing scattered farmstead and dwellings. Most of this character area is visually separate to the appeal site. More detail on this character area is found in the LVA, CD 1.28 from paragraph 4.13.

Designations

No statutory national or local landscape designations such as National Park, National Landscapes (AONB) or Area of Great Landscape Value (AGLV) apply to the site itself. The plan below shows the designations, and the full-size plan is at Figure 4 Appendix 2.

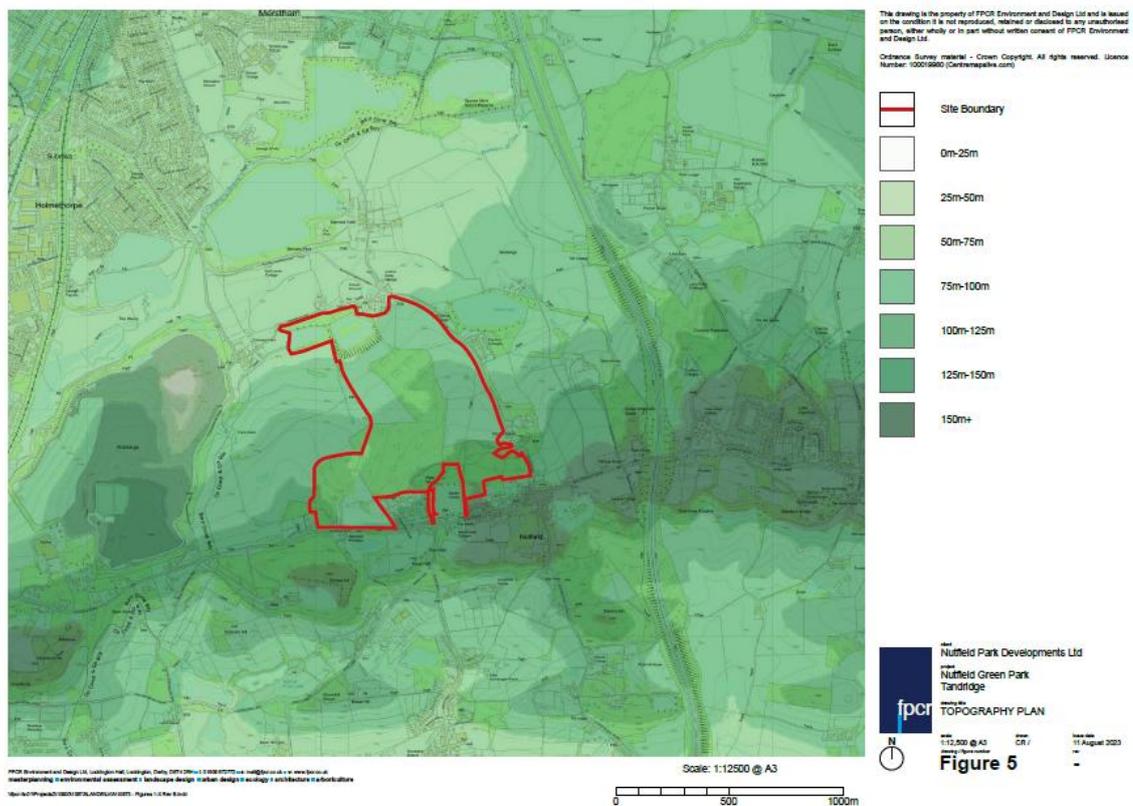


- 3.33 The southern boundary of the Surrey Hills National Landscape is located approximately 0.7km to the north-east of the site. Land within the National Landscape, closest to the site, is relatively low lying which limits its relationship with the site. The land within the National Landscape rises more steeply further north to allow for a limited and distant visual relationship between the site and the higher south facing land within the National Landscape – the higher areas of land lie approximately 2.5 to 3km away from the site.
- 3.34 The local AGLV designation covers a large area located to the south and east of Nutfield. The AGLV that falls within the immediate context of the site is located south of the A25 Nutfield Road and south-western section of the site and there is a partial visual relationship between the AGLV and the site in this area - existing trees and other vegetation that flank the A25 limiting this relationship.
- 3.35 A number of listed buildings/structures are located within the study area, which are shown on Figure 4. Heritage assets in the area are set out in the proof of evidence of Andrew Josephs.
- 3.36 The Site is located wholly within the Metropolitan Green Belt. The effect on the Green Belt, in so far as they relate to my evidence are covered in section 7 of my proof of evidence.

Topography

Context – Landform

- 3.37 The site is located on the north-facing slopes of a prominent ridge that lies on a broadly east/west axis to the east of Redhill. The topography of the area is shown graphically below with the full-size plan at Figure 5 at Appendix 2.



- 3.38 The historic core of Nutfield village, the Bletchingley Road and Bletchingley village to the east of Nutfield all lie on the higher land of the ridge at approximately 150 – 165m Above Ordnance

Datum (AOD). South of Nutfield land slopes down towards South Nutfield which lies at approximately 80m AOD 2km away. North of Nutfield including the site, the land slope down to the north and north-west reaching a height of approximately 80m AOD where a series of lakes lie east of Holmthorpe and south of Mersham.

- 3.39 Further north from Mersham and the M25 land rises again steeply up to the Surrey Hills / North Downs, reaching a height of approximately 220m AOD south of Caterham.

Site - Landform

- 3.40 The site is broadly located on a north-west facing slope with some more localise undulation within the site. The southern extents of site the meet Nutfield Road at approximately 130m AOD the land broadly slopes from Nutfield Road down to its northern boundary typically lying at approximately 80-85m AOD at Chillmead Lane.

Landscape Value

- 3.41 The landscape value of the site and its immediate context was evaluated in the LVA CD 1.28 from paragraph 4.46. This included an analysis of the factors set out in Landscape Institute Technical Guidance Note 02-21 and summarised in the LVA methodology, The factors are repeated below

- Natural Heritage:
- Cultural Heritage
- Landscape Condition:
- Associations:
- Distinctiveness:
- Recreational Value:
- Perceptual (Scenic):
- Perceptual (Wildness and tranquillity):
- Functional aspects:

- 3.42 Having appraised the above factors it is judged that the site and the immediate landscape is of "Medium" landscape value, and not a "valued landscape" as in Paragraph 187a of the NPPF.

Visual Baseline

- 3.43 A visual appraisal has been undertaken for the site, within the LVA CD 1.28. This explored the nature of the existing visual amenity of the area and sought to establish the approximate visibility of the site from surrounding locations and receptors. A series of photo viewpoints were selected to support the analysis.
- 3.44 Photographs have been taken to illustrate a view from a specific vantage point, or to demonstrate a representative view for those receptors that are moving through the landscape, e.g. rights of way users. The viewpoints are included at Appendix 2.

3.45 As the Inspector will visit the site, there is no need in this proof of evidence to repeat the descriptions of the relevant viewpoints, which are set out in the LVA CD 1.31 at Appendix B to the LVA.

3.46 In summary however the visual analysis demonstrates that.

- Higher sensitivity receptors with views of the site include users of PRoW that pass through and adjacent to the site and residents within dwellings located directly adjacent to the site including those along Church Hill, Nutfield Marsh Road, Chillmead Lane to the north and east; and those along the southern edges of the site accessed off Nutfield Road, Shortacres, Hunters Gate, Blacklands Meadow and Parkwood Road;
- Users of PRoW routes within the site experience woodland setting within more contained spaces of the site in contrast with open and distant views from the more open areas of the site within the northern grassland areas on higher ground;
- Users of PRoW routes within the wider context of the site have views towards the northern sections of the site with the site woodland parcels screening the remaining development from view;
- Users of the neighbouring recreational spaces at Nutfield Memorial Recreational Grounds to the south and Nutfield Cricket Club Grounds to the north have views towards the site that are screened by existing trees and woodland;
- Visitors to St Peter and St Pauls Church have views towards the south-eastern sections of the site within the context of existing residential properties and woodland within the site;
- Users of the local roads adjacent to the site have transient views into the southern and eastern sections of the site;
- Visitors to the Surrey Hills National Landscape located north and north-west of the site respectively have views of the northern sections of the site where the opened grassland and adjacent woodland within the site are viewed in the context of the wider landscape which includes woodland, farmland, quarry activity and urban settlements; and
- Broadly the southern sections of the site are more visually contained and less visually sensitive than the more open areas within the northern sections of the site.

4.0 THE APPEAL SCHEME

4.1 I worked with my team and the wider design team to develop sensitive development proposals and an appropriate landscape scheme.

4.2 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 built development is largely focused on more open areas of grassland and younger scrub, where enclosed by more mature trees and woodlands. The more open and visually exposed northern slopes have been kept free from built development.

Landscape and Green Infrastructure (GI) Proposals

4.3 The landscape and GI proposals are an important part of the scheme. These are shown on the Landscape and Ecology Strategy Plan (below with full size plan at appendix 3) accompanying the planning application.



4.4 In summary these proposals include:

- The provision of 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;
- The northern grassland areas will become accessible open space for informal recreation for the local community whilst increasing biodiversity through improved grassland management;
- The vast majority of woodland within the site will be retained with a loss of 2.13 ha of predominantly lower quality areas to allow for new access and development plots. New

woodland planting within the site will be appropriately located north of Parcel B8 to help provide visual screening for the new development within this area. The woodland will also provide more substantial ecological connections between the existing woodland features within the site. There is no arboriculturally reason for refusal.

- New scrub planting will be included within the northern sections of the site adjacent to the central woodland;
- The existing low-quality modified grassland within the north of the site will be managed for increased biodiversity;
- New wetland areas will be incorporated into the sustainable drainage design to help increase biodiversity as well as providing visual interest for users of the accessible open space;
- Interpretation panels will be located within the site to help users of the open space to appreciate the local landscape character and ecological assets present within the site;
- All public rights of way will be retained within the site with several of the routes being upgraded for ease of access and cycle use. These routes will tie into new informal paths provided within the site for recreational use and greater permeability;
- Views across the northern grassland parcels to the wider landscape context will be retained; and
- New structural planting to the north-east of the IRC will help minimise potential visual impacts upon visitors to the nearby church and residents.

4.5 These proposals will be secured by planning condition. The new networks of paths will be secured for the long term, providing a benefit in terms of recreation provision.

Landscape Management

4.6 All of the landscape areas and public open space features will be managed and maintained. This would be achieved through the implementation of a comprehensive Landscape Management Plan (LMP), to ensure the successful establishment and continued thriving of the landscape proposals, which would be secured by condition.

5.0 LANDSCAPE EFFECTS

5.1 The following section sets out my assessment of the landscape and visual effects, based on the Landscape and Visual Appraisal, which includes the assessment methodology and criteria (CD 1.31).

National level- NCA 120 "Wealden Greensands".

5.2 At a national level, the site lies within National Character Area 120 'Wealden Greensands'. The new development will occur within a very small area of the 'Wealden Greensands' NCA and will be adjacent to existing residential development south of the site. Although the open land within the southern sections of the site and areas of woodland and vegetation will be lost to development, the overall strategy will greatly increase the site's biodiversity assets. The development will have a relatively limited influence upon the surrounding landscape given the site's level of physical and visual containment afforded by the localised landform, intervening woodland and the existing residential context. The Development of the proposed site is modest in scale and nature, responding to its context and would have a Negligible effect on the wider National Character Area.

Surrey Hills National Landscape

5.3 There is considered to be very limited potential for intervisibility between the National Landscape and the areas of proposed built development within the site. The southern sections of the site where residential development is proposed is well screened by intervening woodland blocks within the site. If any parts of the proposed buildings are seen over or through the surrounding woodland, the impact will be negligible at the distance involved.

5.4 The north facing slopes within the site are more open, but still partially screened by intervening trees and woodland features within the views from the National landscape. The slopes that are currently managed as pasture are visible as areas of grassland within the context of the wider landscape. These more visually exposed areas of the site are proposed as ecologically enhanced areas with increased public access. The areas will include new woodland, scrub and grassland planting. The landscape proposals are predominantly for areas of open enhanced grassland which would result in no change within the context of the National landscape setting.

5.5 The resultant landscape effect of the proposals upon the Surrey Hills National Landscape is considered to be Negligible.

5.6 The draft Surrey Hills 2025-2030 Management Plan, sets out the Special Qualities of the Surrey Hills National Landscape. These are

- Hills and views
- Woodland
- Heathland
- Commons
Chalk downland
- Water: Rivers and Ponds
- Agricultural land
- Boundary features

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

5.7 Of these the only Special Quality potentially affected would be “*Hills and Views*.” The distance and high degree of screening of the built form within the scheme, means that there would be no harm to this or any other Special Quality arising from the scheme.

5.8 There is no harm alleged to the National Landscape in the reason for refusal, or the officers report for Committee.

District Landscape Character

5.9 The site lies within the District Landscape character area UE9: Holmthorpe Pits and Mercer's Park.

5.10 There is scope through the application proposal to follow the landscape guidance set out within the Surrey Landscape Character Assessment, which covers this area. The proposals will achieve these by: conserving and enhancing features of biodiversity value as far as possible by developing predominantly within the more open areas of the site where less vegetation and features of value are present resulting in minimal loss – new woodland planting will enhance existing feature and low quality grassland will be managed for increases in biodiversity; retaining the northern areas of the site as open landscapes will retain the ‘*open views to the wider landscape*’; and installation of interpretation signage within the new accessible open spaces will ‘*encourage understanding*’ of the local biodiversity and historic elements of the site.

5.11 Change of the type proposed within the northern sections of the site will go largely unnoticed within the wider context of the LCA. The built form proposed within the site will increase the settlement size of Nutfield which will most be apparent from Nutfield Road when passing the site or from within the site itself. Overall, however 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. Parts of Nutfield village that are north of the A25 do fall within the LCA and the proposed residential development will be viewed as an extension of this from limited locations and overall would have very little impact upon the LCA as a whole in particular not impacting on the existing openness associated within the north of the site and wider LCA.

5.12 Proposed earthworks to form the SuDS features and other landforms including the planted landform adjacent to parcel D8 will not be out of keeping within the LCA.

5.13 The landscape proposals will help assimilate the new built form within its landscape context. Hedgerow removals along the A25 will allow for the new main vehicular access point though these proposals will be landscaped to form a positive feature on the A25 as a gateway into Nutfield from the west.

5.14 Considering the above points and the beneficial effects of the area of new accessible open space and positive architectural features suggested in the application material 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.

The Site and Immediate Context

- 5.15 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.
- 5.16 Planting within and altered management of the northern grassland areas will result in only a slight change from the existing nature of the site with the new earthworks relating to the new drainage features presenting a short term change in character – early landscaping will help soften these features to a degree from completion.
- 5.17 New landform associated with the building plots will be noticeable locally. The new main road route will need cut and fill of the existing landform to enable safe and practical access. Additional earthworks are proposed to allow for the Integrated Retirement Community plot to be reduced by 1.5m. Earthworks within the northern grassland areas will be required to allow for new drainage features and a planted landscaped landform to be implemented.
- 5.18 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.
- 5.19 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

- 5.20 Nutfield comprises three separate parts known as Nutfield Marsh which is located to the north of the A25, the old village of Nutfield along the A25 and South Nutfield to the south, down from the ridge. The appeal scheme relates to the old Village of Nutfield, which includes some older properties along with newer areas of residential development. This is a largely linear settlement along the A25, but with development at depth, to the north of the A25 and particularly to the western end of the settlement. The photographs below show some of the character of Nutfield.



- 5.21 This photograph shows a view along the High Street, the A25, from near the junction with Church Hill. The form and appearance of the settlement here is of a linear street.



- 5.22 This photograph shows Hunters Gate, further west along the High Street, a small development of houses just north of High Street. This shows development in depth, extending towards the appeal site.



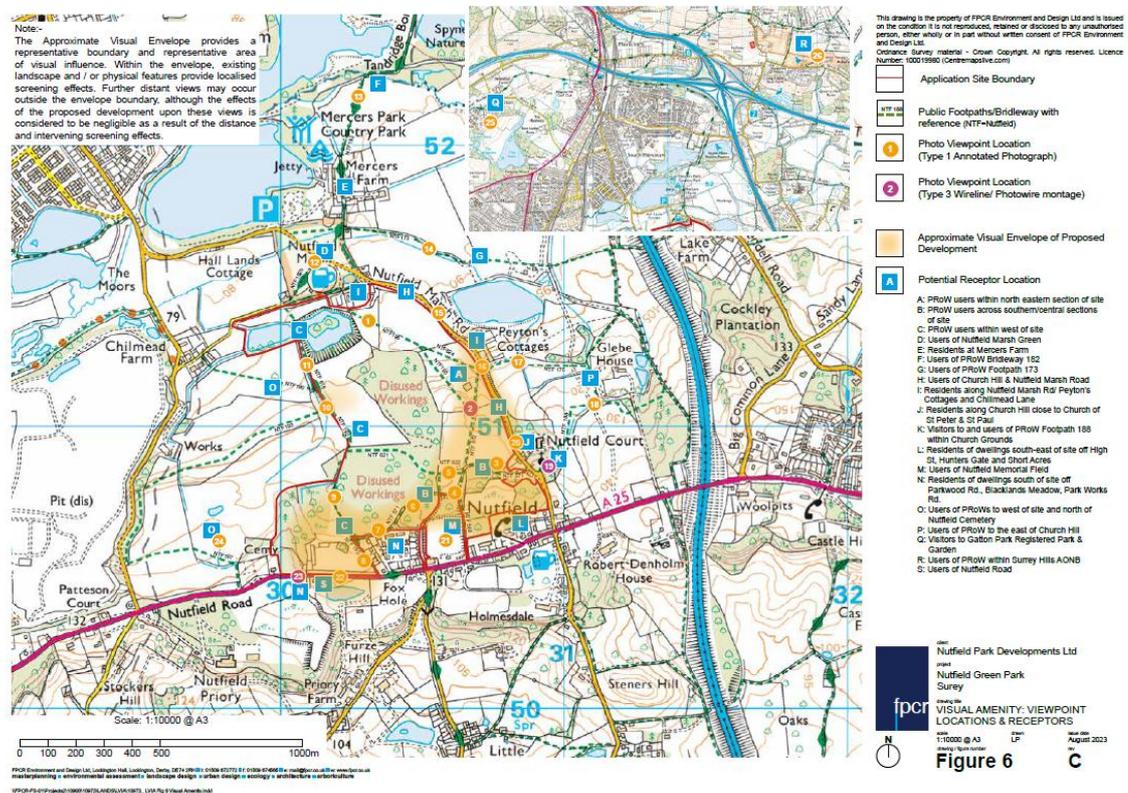
- 5.23 This photograph shows Blackland's Meadow, a 20th century residential development north of High Street, towards the western end of the village. Development in depth is clearly apparent. The trees beyond the houses in the photograph are within the appeal site, though the proposed housing lies east and west of these trees.
- 5.24 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 as shown on the Land Use Parameter Plan, CD 1.61 would continue this character, with a block of development to the west, which would be experienced when passing through Nutfield. The central area of proposed 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 be heavily filtered by the woodland that surrounds the site and would not have a notable effect on how the settlement is experienced.
- 5.25 The scheme would be a modest addition to the built form of Nutfield and would not be out of place with the form of 20th century development within the village.

Landscape Summary

- 5.26 The landscape effects have been assessed at a variety of geographical scales. The scheme would have a negligible effect on the Wealden Greensands National Character Area. Within the local landscape character area UE9 Holmthorpe Pits and Mercers Park there would be a Moderate/ Minor adverse effect at completion, reducing to a Minor effect after 15 years when the new planting is maturing. At the local level of the site and its immediate context, there would be Moderate adverse effect at completion reducing to a Moderate Minor effect by year 15. The scheme has been carefully developed within an existing landscape framework, to minimise the landscape effects beyond the site itself, and benefits will arise from the wider area of green infrastructure at the northern end of the site, through enhanced management.

6.0 VISUAL EFFECTS

6.1 The Visual effects of the scheme were assessed in the LVA. The likely visual effects are summarised below. The different visual receptors (groups of people who could experience a change in the view) are shown on Figure 6 from the LVA, below (full size plan at Appendix 2 to this proof of evidence.)



Residential Properties and Settlement

6.2 There are relatively few residential receptors likely to experience effects 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. This is the case for dwellings accessed off Parkwood Road (Receptor N) that back onto the south-western site parcel where new dwellings area proposed within Parcel D1. Lesser effects will be experienced for other dwellings within this area of Nutfield including those off Blacklands Meadow and Park Works Road where views are towards existing woodland located along the southern boundaries of the site. These dwellings will have only glimpse views towards the access road (The Drive) and movements along it that passes through the south-central woodland; or of new dwellings within Parcel D7 (The parcels are shown on the Components Plan CD 1.66) beyond the retained woodland. Effects upon residential receptors adjacent to the south-western section of the site are considered to be Moderate Adverse at worst from completion and after 15 years with little scope for reduction in effects through landscaping measures.

6.3 Residents within close proximity to the south-eastern section of the site include those along Church Hill close to Church of St Peter & St Paul (4 dwellings). Receptors will experience views of the development within the IRC from the rear located east their dwellings. Views will be in

the context of the filtering woodland context beyond their properties. An area of proposed structural planting will be included. This planting will help soften views of the proposed buildings which will increase overtime as plants mature. Effects upon residential receptors close to the south- eastern section of the site are considered to be Moderate / Minor Adverse at completion reducing to Minor Adverse after 15 years through planting.

- 6.4 As above some dwellings adjacent to the site will experience adverse effects as a result to the development, however some residential properties with views towards the site will not experience the same degree of change due to the intervening woodland within the site being retained as part of the proposals. This is the case with residents of dwellings south-east of site off High St, Hunters Gate and Short Acres (Receptor L) where views into the site are of the woodland areas located south of the IRC. This will result in only glimpse views of the proposals being possible from for these receptors. Effects are therefore considered to be Minor Adverse during operation.
- 6.5 Residential receptors close to the northern sections of the site (Receptor I: Residents along Nutfield Marsh Rd / Peyton's Cottages and Chillmead Lane – approximately 21 dwellings) will experience little change in views from their properties as the landscape proposals will not be significantly different to the existing features within the site. New grassland management will be implemented; new scrub and woodland planting will take place adjacent to the existing woodland areas and for some receptors the new drainage features will be landscaped to soften their appearance resulting in them appearing relatively subtly within the existing landscape. For those receptors with views that include areas adjacent to Parcel D8 there may be distant glimpses of the upper sections of new dwellings though these would be either fully screened or filtered by the new landform feature and tree planting proposed north of Parcel D8. For this receptor those experiencing the greatest effects are considered to be Minor Adverse at completion reducing to Negligible in the long term after 15 years.
- 6.6 More distant residential receptors by Mercers Farm (Receptor E – 8 dwellings) would only experience glimpse views from a distance of the proposals within the northern section so the site including potential glimpses of development within Parcel D8. Effects are considered to be up to Minor Adverse at completion reducing to Negligible 15 years.

- 6.11 Where ProWs pass through the northern sections of the site development proposals consist predominantly of landscaping including relatively minor earthworks to allow for new drainage features and new planting to create wetland features, enhancement to the woodland edges and softening of the new landforms including the new bund north of Parcel D8. Users of these routes within close proximity to D8 (Receptor A (NTF 572, NTF195, NTF 624)). At most those with views including the area north of Parcel D8 are assessed to experience Moderate / Minor Adverse effects at completion reducing overtime to Minor Adverse / Negligible effects at 15 years. The wireline Photomontage from path NTF 571 at Figure 31 appendix 2 shows the potential visual effects. A new earthwork landform would screen any low level activity from the year of completion, and by 15 years after completion, planting would screen any views of new development.
- 6.12 Users of other ProW or recreational spaces in the wider context including (Receptor O (NTF 190,193 & 197) and P (NTF 175 & 188)) will experience Minor Adverse / Negligible effects at most after completion reducing overtime to Negligible effects after 15 years.
- 6.13 Those within the wider context including users of the ProW to the north of Mercers Farm, Users of Nutfield Memorial Field and ProW users west of the site and north of Nutfield Cemetery effects are assessed to be no greater than Minor Adverse / Negligible at most from completion reducing to Negligible overtime.
- 6.14 For receptors at very distant locations to the north and north west of the site including Visitors to the Surrey Hills AONB (Receptor R) and Lower Gatton Park (Receptor Q) the development proposals will be relatively inconsequential within views resulting in Negligible effects during operation.
- 6.15 Whilst views from some existing routes will be affected by new built development, the development sites will also include new planting. Views from paths such as Nutfield 571, which lies south of the proposed access road, The Drive, can be softened by new understory planting within the existing woodland, between the path and the road. A network of new paths can also be established and secured for the long term through the planning consent. These are shown on the plan at Appendix 4 and include new routes across the grassland and scrub areas on the northern slopes. Whilst different to the views within the woodland to the south, these new routes 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.

Roads & Transport Users

- 6.16 Users of the nearby road routes will experience transient views of the development proposals. These include users of Nutfield Road passing the south-western section of the site where the new housing and access arrangement off Nutfield Road will be visible in the context of the existing Nutfield settlement edge appearing as an extension of the village. The proposal will help create a positive feature entering the village. Effects upon users of this section of Nutfield Road (Receptor S) are assessed to be Moderate / Minor Adverse at completion reducing to Minor Adverse overtime as planting within the southern boundary landscape buffer matures. The wireline Photomontage at Figure 33 shows the likely visual effects.
- 6.17 Other road users include those to the east and northeast of the site along Church Hill, Nutfield Marsh Road (Receptor H) partial to glimpse views of development within Parcel IRC would be

visible for users of this route in the context of existing residential development and the woodland setting. Effects upon these receptors are considered to be Minor Adverse from completion.

Summary

- 6.18 The very contained nature of the site limits the visual effects. There would be some close range views from properties in Nutfield that are close to the site, where Moderate visual effects would be experienced, but from further away from the site is well contained and no effects greater than Minor adverse are predicted. Views from a number of public rights of ways would be affected as they pass through the site, or close to it, but again visual effects beyond the immediate site are very limited. The levels of effect would vary between Major/ Moderate adverse to minor/ negligible. There would be visual changes leading to Moderate/Minor adverse effects for users of Nutfield Road, where close to the site entrance at completion and reducing over time.

Overall summary

- 6.19 As with any scheme there will be an inevitable range of landscape and visual adverse effects arising from the change from green field site to built development. This scheme has been carefully considered to minimise these effects, and to include positive mitigation.
- It should be noted that the Site is not subject to any national, local or other landscape designations. (Confirmed in paragraph 7.44 to the SoCG CD 8.1)
 - In addition, a substantial portion of the Site is retained and enhanced as Green Infrastructure (Approximately 88% or 52ha). (Confirmed in the SoCG CD 8.1 paragraph 7.45)
 - The Council have also confirmed in the Statement of Common Ground CD 8.1 (Paragraph 7.46) that "*No objection on landscape grounds has been raised*". (Paragraph 7.46)

7.0 GREEN BELT

7.1 A Green Belt assessment was undertaken and submitted with the application (CDs 1.28-1.31). During the course of the application, significant changes were made to the National Planning Policy Framework and a Green Belt Assessment Addendum was submitted (CD 2.17) My conclusions below draw on these earlier assessments, and on up to date guidance and practice.

7.2 The NPPF (December 2024) set out a number of changes to Green Belt with the introduction of the concept of grey belt. This is defined as:

'For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143.' 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development. (Annex 2 Glossary).

7.3 This section of my proof assesses the role of the site against Green Belt purposes, a, b and d. The consideration of other matters pertaining to grey belt is covered in the Planning Proof of evidence produced by Richard Henley.

7.4 The NPPF (December 2024) was further updated with some minor clarificatory amendments in February 2025, specifically in relation to paragraph 155:

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

7.5 This section of my Proof of evidence also addresses whether the development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan, pursuant to paragraph 155(a) of the NPPF.

National Planning Practice Guidance

7.6 National Planning Practice Guidance (NPPG), supplements the NPPF with guidance. An update to the guidance was released 27th February 2025. It sets out some of the factors that should be taken into account when considering the potential impact of development on Green Belt land and identifying grey belt land.

7.7 The NPPG guidance sets out:

- *"the considerations involved in assessing the contribution Green Belt land makes to Green Belt purposes, where relevant to identifying grey belt land*
- *the considerations involved in determining whether release or development of Green Belt land would fundamentally undermine the remaining Green Belt in the plan area;*
- *guidance for considering proposals on potential grey belt land*
- *guidance on identifying sustainable locations when considering the release or development of Green Belt land*

- *updated guidance on how major housing development on land which is released from the Green Belt through plan making, or on sites in the Green Belt, should contribute to accessible green space*
- *updated guidance on how to consider the potential impact of development on the openness of the Green Belt".*

7.8 Under a section titled 'Assessing Green Belt to identify grey belt land' the NPPG notes:

"This guidance is relevant to those authorities performing a review of Green Belt boundaries to meet housing or other development needs (either prior to or as part of the plan making process), those authorities otherwise required to determine whether land constitutes grey belt in decision making, and others seeking to identify grey belt land."

7.9 At Paragraph 001 it continues:

"Where land is identified as grey belt land, any proposed development of that land should be considered against paragraph 155 of the NPPF, which sets out the conditions in which development would not be inappropriate on grey belt land".

7.10 A series of tables are set out at Paragraph 005, illustrating features that are likely to be noted against a 'Strong', 'Moderate' or 'Weak/None' contribution to Green Belt purposes a, b, and d.

- Purpose a - to check the unrestricted sprawl of large built up areas
- Purpose b - to prevent neighbouring towns merging into one another
- Purpose d - to preserve the setting and special character of historic towns

7.11 For brevity, the illustrative text descriptions are not reproduced here but are referenced in the following section.

7.12 This section of the proof of evidence also assesses whether the proposed development would fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan, pursuant to paragraph 155(a) of the NPPF.

Whether the site should be classified as grey belt

7.13 The first stage of this test is to assess whether the site does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143, the Green Belt purposes.

7.14 The submitted Landscape and Visual Appraisal and Green Belt Assessment October 2023 (FPCR) provided background on the role of land within the Green Belt. This assessment provided commentary on the Tandridge District Council Green Belt Assessment December 2015 - Main Report. This report included Nutfield and the application site within a large assessment parcel, described as GB 28.

7.15 The NPPG sets out how local authorities should define land to be assessed within Green Belt assessment. It notes that a small number of large assessment areas will not be appropriate in most circumstances, and that assessment areas should be "*sufficiently granular*" to enable the assessment of their variable contribution to Green Belt purposes.

7.16 The Tandridge assessment was completed prior to current guidance in the PPG. It is not a granular assessment and does not identify grey belt land. The study is therefore of limited assistance in the current assessment of the site in terms of grey belt.

7.17 In the following section of this proof of evidence, I assess how the appeal site performs against the Green Belt purposes A, B and D using the approach recommended in the PPG.

Purpose a - to check the unrestricted sprawl of large built up areas

7.18 The site lies adjacent to Nutfield, which is a village not a large built-up areas.

7.19 For the evaluation of Green Belt, the NPPG clarifies that purpose a, "*relates to the sprawl of large built up areas. Villages should not be considered large built up areas*".

7.20 In the assessment criteria the NPPG notes that areas of land that make a "*weak or no contribution*" to Purpose (a) are likely to include those that: - are not adjacent to or near to a large built up area. The site falls clearly within this definition. Nutfield and South Nutfield are villages not large built up areas. This has been agreed with the council in the Statement of Common Ground.

Purpose b - to prevent neighbouring towns merging into one another

7.21 Nutfield and South Nutfield are villages not towns.

7.22 For the evaluation of Green Belt, the NPPG clarifies that purpose b "*relates to the merging of towns, not villages.*"

7.23 The NPPG criteria sets a definition of "Weak or None "contribution and states

"Assessment areas that contribute weakly are likely to include those that:

- do not form part of a gap between towns, or

- form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation"

7.24 The application site falls within this description. The site would make a weak/no contribution to purpose b. It has been agreed with the council in the Statement of Common Ground, that Nutfield is a village not a town.

Purpose d - to preserve the setting and special character of historic towns

7.25 The site does not provide a setting, or any contribution to the special character of a historic town.

7.26 The NPPG states that in relation to Green Belt purpose d:

"This purpose relates to historic towns, not villages. Where there are no historic towns in the plan area, it may not be necessary to provide detailed assessments against this purpose."

7.27 The site is not near any historic town and makes no contribution to this purpose.

7.28 Mr Henley's proof addresses whether "*the application of the policies relating to the areas or assets in footnote 7 would provide a strong reason for refusing or restricting development*" (second limb to the grey belt definition in the Annex 2 glossary to the NPPF).

7.29 In summary the conclusions on the contribution of the site to green belt purposes a, b and d are 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

Consideration of whether the site is Grey Belt

7.30 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.

7.31 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 155a

7.32 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 (just point "a" 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)

7.33 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.

7.34 The following section of my proof of evidence looks at how the development would affect the purposes (taken together) of the remaining Green Belt across the area of the plan and whether the development would fundamentally undermine the purposes, to feed into this planning judgement. This must be a high bar to reach. This judgment draws on the assessment of the contribution of the site to Green Belt purposes, but is a different exercise, assessing how the development (rather than the site) would affect purposes taken together across the area of the plan. The PPG notes at paragraph 64-008-20250225, that when reaching a judgement on the impact of development on the remaining Green Belt in the plan area

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.*” (My emboldening).

- 7.39 The Councils Statement of Case (CD 12.1 paragraph 9.4) alleges that,
- “In terms of its contribution to the purpose set out at para. 143 c) the Green Belt in this location strongly assists in safeguarding the countryside from encroachment. There is clear encroachment on the countryside by the development. In relation to the role which the site plays in safeguarding the countryside from encroachment the site currently strongly contributes to Green Belt purpose (c).”*
- 7.40 However, the test at paragraph 155a of the NPPF is not about the contribution the site makes, but whether the *development* would “*fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan*”. In this case the development covers a very small proportion of the overall site, and an even smaller part of the Green Belt across the plan area.
- 7.41 The Councils Statement of Case also makes reference to the Officers Report (CD 3.1), paragraph 12.27) which notes the analysis of the Inspector in the Burnham appeal (APP/X0415/W/25/3360406), (CD 10.48).
- 7.42 This appeal was for a single detached dwelling at Burnham Buckinghamshire and was in the Metropolitan Green Belt. In this decision notice, the inspector determined that the site was considered to be “*grey belt*” (paragraph 17). The inspector then went on to analyse the development in terms of Paragraph 155 of the NPPF, in particular in terms of conflict with Green Belt purpose c, encroachment of development into the countryside. The inspector found at paragraph 20 of the decision notice that the “*site is devoid of development except for fencing and a gate*” and that “*Although relatively small in size, the presence of the site amongst the large residential properties that surround it contributes positively to the rural character and tranquillity of this area of the countryside.*” The inspector went on to conclude conflict with Green Belt purpose (c). Almost any built development on an open site, would by definition, cause conflict with Green Belt purpose c. That however is not the test at NPPF paragraph 155, which is whether the development would “*not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan.*” In this appeal decision the inspector went on to conclude at paragraph 21 of the decision notice that the scheme would fundamentally undermine the purposes, so it failed to meet Paragraph 155 overall. No further analysis was provided to explain how that conclusion was reached.
- 7.43 In the Officer Report for this appeal (CD 3.1) the officers referenced this appeal decision and considered that.
- “The same arguments are considered to be applicable to the application site, which is much more extensive in terms of its site area – 7 hectares compared to 0.13 hectare – and therefore the impact of the encroachment of development into the countryside would be more significant.”*

- 7.44 The logic of following this approach, would mean that virtually no schemes would ever pass the test of not fundamentally undermining the purposes (taken together) of the remaining Green Belt across the area of the plan. This cannot be correct and is not how the issue has been dealt with by the Secretary of State elsewhere, as discussed below.

Appeal made by Greystoke Land and Altrad UK Limited. Woodlands Park landfill site, Land south of Slough Road, Iver, Buckinghamshire -Application ref: pl/24/0754/oa, Appeal ref APP/N0410/W/24/3347353 (CD 10.1)

- 7.45 This appeal was determined by the Secretary of State and related to an application for a "hyperscale Data Centre of up to 72,000 sq. m" on a site of 22.15ha. The Secretary of State determined that the site was "grey belt" and considered the various parts of NPPF paragraph 155, from paragraph 27 of the decision notice. Paragraph 27 is repeated below,

"The Secretary of State has taken into account the above conclusions in paragraphs 20-26. She agrees with the Inspector's conclusion that the scale of development would represent encroachment into the countryside, in conflict with purpose c), and that this would give rise to moderate harm (IR8.22). She has also taken into account the extent of this development site in the context of the remaining GB in the plan area. Overall, she concludes that the development would not fundamentally undermine the purposes, when taken together, of the remaining GB across the area of the plan. The proposal would therefore meet Framework criterion 155(a)."

- 7.46 In this case a clearly significantly larger development was deemed not to not fundamentally undermine the purposes, when taken together, of the remaining GB across the area of the plan.

- 7.47 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 accordance with NPPF 155a

- 7.48 My conclusions on whether the development would fundamentally undermine the purposes across the area of the plan are summarised below

Green Belt Purpose	Would the development fundamentally undermine the purpose across the area of the plan
a) to check the unrestricted sprawl of large built-up areas	No
b) to prevent neighbouring towns merging into one another	No
c) to assist in safeguarding the countryside from encroachment;	No
d) to preserve the setting and special character of historic towns; and	No
e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.	No

- 7.49 Apart from the direct changes to the site itself, the changes would be barely perceptible across the wider Green Belt within the plan area, which would remain as they, are contributing to the relevant Green Belt purposes. Taken together, the development would not fundamentally undermine the purposes of the remaining Green Belt across the area of the plan. the proposals would, therefore, meet NPPF criterion 155(a)

Green Belt Openness

- 7.50 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. Footnote 55 to the NPPF sets out that if development is considered to be not inappropriate development on previously developed land or grey belt, then this is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness. Mole Valley BC v SSHCLG [2025] EWHC 2127, (CD 10.64) makes it clear that if the scheme is not inappropriate, then there is no Green Belt harm at all to be weighed in the overall balance.
- 7.51 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.
- 7.52 An analysis is included below, to cover that situation.

Effects of the scheme on the Openness of the Green Belt

- 7.53 The Planning Practice Guidance (PPG) notes that openness is capable of having both spatial and visual aspects - in other words, the visual impact of the proposal may be relevant, as could its volume, and that the duration of the development and its reversibility are factors to consider along with the degree of activity, such as traffic generation. The housing element of the scheme would not be reversible. Any traffic would enter the existing road network, where traffic is already perceptible. There is a new section of road proposed between development parcels within the site, but this is very contained by existing woodland, so the effect on openness of traffic would be very limited.
- 7.54 In terms of spatial openness, the scheme would involve the change of 58.8ha ha of low grade regenerating former landfill/ mineral extraction land to built development and green infrastructure. The developed part of the site would be approximately 7 ha. The proposed housing, in accordance with the development parameters, would be no more than two and a half storeys, at and a maximum height of 10.5 m to ridge within a small section of the site. The care village would be set lower than existing ground levels so reaching 13m above the existing ground, as indicated on the parameters plans. By definition any new housing development on currently open land, would lead to a significant effect on spatial openness, on the directly affected parts of the site. For this scheme it should be noted that within the overall site there is approximately 52 ha of Green Infrastructure proposed, compared with circa 7ha of built development. The Green infrastructure has no effect on spatial openness but does bring a range of other benefits.
- 7.55 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 due to the surrounding built form and intervening vegetation. Generally, there are very few locations beyond the immediate context of the site where there would be any notable views of the proposals. The viewpoints used in the appraisal and the visual envelope are shown on Figure 6, Appendix 1.
- 7.56 From the north, views are limited by woodland that surrounds the site. Where there is a small gap in the woodland, a new earth landform would be established and planted to continue visual containment. With the modified landform of the site, this new landform and slopes would not be out of place and with planting would be rapidly assimilated.
- 7.57 There would be a very limited effect on visual openness for users of the A25 Nutfield Road to the south. Some additional built development would be apparent for a short distance west of the existing settlement. South of the A25 there would be little perception of the scheme.
- 7.58 Overall, it is considered for the reasons above that the effects on visual openness arising from the scheme would be very limited. The extensive areas of existing woodland to the north-east and west, and settlement mainly to the south provide visual containment and additional planting within and around the scheme would further reduce any effects on visual openness over time.

Improvements to Green Space

- 7.59 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. These are covered in the proof of evidence of

Richard Henley but Policy 156 (c) is relevant to my proof of evidence. Part c of NPPF 156 states that the following contribution should be made

“the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.”

- 7.60 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.
- 7.61 The development proposed includes extensive landscape and ecological enhancements to the wider site, not within 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, but the illustrative Landscape and Ecology Strategy plan at appendix 3 shows how this could be developed. The Statement of Common Ground, notes under the heading “Ecology” at paragraph 7.39 that *“The Appeal scheme will deliver a minimum biodiversity net gain increase of 22.39% in habitat units, 72.92% in hedgerow units and 586.83% in watercourse units.”*
- 7.62 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.

8.0 THE OFFICERS REPORT TO COMMITTEE CD 3.1

- 8.1 Section 12 of the officer's report deals with the assessment of the proposals. Green Belt considerations are dealt with from paragraph 12.5.
- 8.2 The Officers report deals with whether homes and commercial development would not be inappropriate development in the Green Belt from paragraph 12.8. Part of the consideration is correctly noted from Paragraph 155 of the NPPF is whether,
- "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;"*
- 8.3 My consideration of this issue is set out at section 7 of my proof of evidence.

Character and Appearance

- 8.4 The officers report deals with this from paragraph 19.1. At paragraph 19.5 the officers note,
- "The provision of two vehicular accesses from Nutfield Road (one emergency only) is consistent with the prevailing character of sporadic residential developments. While the main access road to the south along the A25 would be larger in width it would not be at odds with the character of the surrounding area. From a character perspective there is no objection to the location of the access."*
- 8.5 Officers also note that the application is in outline, with only access made in full. Officers also note the three areas of new built development, two residential in character and one to the east for an Integrated Retirement Community (IRC).
- 8.6 In terms of the IRC, officers concluded that was capable of forming its own character while respecting the character of street facing development. As a result, officers considered that the IRC would not result in significant harm to the character and appearance of the area when viewed from the A25. Officers did however consider that it would be likely to be visible from Church Hill to the east and would be likely to impact on views from St Peter and St Paul Church.
- 8.7 In terms of the residential development areas, officers noted the existing sporadic development form of Nutfield. Officers expressed concern about the effect on the scale and form of Nutfield of the new development, suggesting it could "*overwhelm*" it. This would be due to extending north, and the loss of woodland and the "*verdant and sylvan character of the area*"
- 8.8 I do not consider the development would do any of these things. The scale of the development is relatively modest and would not overwhelm the village. Essentially developed on three areas of land, each one it itself is not a large area. Being visually contained also would mean that any experience of the areas would essentially come from being close to it – the whole development would not be experienced as a total. Development already extends north of the A25 and the new development would not be out of character with the existing settlement form, which already contains a variety of housing types and forms, and with development in depth at the western end of the village.
- 8.9 The well wooded character would remain and within the development areas there is scope for additional planting. The village would retain a "*verdant and sylvan character*".
- 8.10 Officers considered the proposal would result in localised harm to character and appearance, which would be "*apparent in views from the A25, Church Hill and the extensive public right of*

way network within and around the wider site," contrary Policies CSP 18 of the Core Strategy and DP7 of the Local Plan and the provisions of the NPPF 2024.

8.11 I consider policy in section 9 of my proof of evidence.

9.0 POLICY

The National Planning Policy Framework December 2024

9.1 The NPPF sets out the Government's commitment to delivering sustainable development. A holistic approach is encouraged, balancing benefits with impacts across all aspects of the development process. The NPPF including Green Belt policy, and more widely, is dealt with in the Proof of evidence of Richard Henley, so I only draw attention to the specific section on landscape.

Conserving and Enhancing the Natural Environment.

9.2 Paragraph 187a identifies how the planning system should contribute to and enhance the natural environment by (amongst others), protecting and enhancing valued landscapes, (in a manner commensurate with their statutory status, or identified quality in the development plan).

9.3 Part (b) of Paragraph 187b states that the intrinsic character and beauty of the countryside should be recognised.

9.4 The LVA concluded that the site and its immediate context is of medium landscape value. I consider that the site is not part of a "valued Landscape". The intrinsic character of the countryside has been recognised in the scheme design. Accordingly, paragraph 187b not 187a is engaged. The scheme does recognise the intrinsic character and beauty of the countryside, through the design of the scheme including the landscape mitigation.

Consultation Draft National planning Policy Framework

9.5 The Government published a revised draft National Planning Policy Framework for Consultation in December 2025. Consultation of the Draft Framework runs until 10 March 2026. At the time of drafting this appraisal, the current NPPF is the relevant policy for decision making. Richard Henley deals with the weight to be attached to the draft NPPF in the planning proof of evidence.

Tandridge Planning Policy

9.6 The reasons for refusal cite conflict with Policies DP10 and DP13 of the Tandridge Local Plan Part 2: Detailed Policies. These are Green Belt policies and are covered in the proof of evidence of Richard Henley.

9.7 Whilst not in the Reason for refusal, the officers report makes reference to Core Strategy Policy CSP 18 Character and Design, and Policy DP7 General Policy for New Development, from the Local Plan. As these are not in the reasons for refusal, the council cannot not allege any conflict with these policies.

Tandridge District Core Strategy October 2008

Policy CSP 18 Character and Design

9.8 This policy requires that new development, is of a high standard of design that must reflect and respect the character, setting and local context, including those features that contribute to local distinctiveness. Development must also have regard to the topography of the site, important trees or groups of trees and other important features that need to be retained.

- 9.9 It goes on to note that development must not significantly harm the amenities of the occupiers of neighbouring properties by reason of overlooking, overshadowing, visual intrusion, noise, traffic and any other adverse effect.
- 9.10 The siting of the development parcels within the wider appeal site has been carefully considered, and I was part of the initial design team that looked at this. The aim was to protect the features of greatest value, such as the highest quality trees, and to locate development to minimise harms on the immediate area. Much of this policy will be determined at reserved matters stage, when details on the proposals are developed, however I see no reason why the scheme cannot comply with this policy.

Policy CSP 21 Landscape and Countryside

- 9.11 This policy states that 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.
- 9.12 The scheme is sensitively designed and located to minimise any adverse landscape and visual effects, and it is notable that none of the reasons for refusal cite this policy.

Tandridge Local Plan Part 2 - Detailed Policies, July 2014

DP7: General Policy for New Development

- 9.13 This general policy for new development sets out that all new development will be expected to be of a high quality design. It states that development should integrate effectively with its surroundings, reinforcing local distinctiveness and landscape character, and that Innovative designs will be encouraged where appropriate.
- 9.14 The policy goes on to set out matters to address, most of which are relevant at reserved matters stage. These include character and layout, along with amenity, environment, landscape and trees. There is no reason why the appeal scheme should conflict with this policy and it is noted it is not part of the reasons for refusal.

10.0 SUMMARY AND CONCLUSION

Introduction and scope of evidence

- 10.1 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

- 10.2 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.
- 10.3 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

- 10.4 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.
- 10.5 At a District level, the site lies within the District Landscape character area UE9: Holmthorpe Pits and Mercer's Park.
- 10.6 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.
- 10.7 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.
- 10.8 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.
- 10.9 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.
- 10.10 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.

- 10.11 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

- 10.12 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.
- 10.13 There is no harm alleged to the National Landscape in the reason for refusal, or the officers report for Committee.

Visual effects

- 10.14 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.
- 10.15 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.
- 10.16 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

- 10.17 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

10.18 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.

10.19 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

10.20 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):

b. 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)

10.21 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.

10.22 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.

10.23 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.

10.24 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.*”

10.25 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

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

Green Belt Openness

10.27 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 .

10.28 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

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

10.30 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.

10.31 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

10.32 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.

- 10.33 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.
- 10.34 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.
- 10.35 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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