

Tandridge District Council

Landscape Proof of Evidence of Louise Hooper,
BA (Hons), L Arch, CMLI

Town and Country Planning Act 1990 Appeal by Cala Homes (Southern Home
Counties), Land at Chichele Road, Oxted, Surrey, RH8 0NZ

PINS Appeal Ref No.: APP/M3645/W/24/3345915
LPA Ref No.: TA/2023/1345

Contents

Summary

1. Introduction
2. Context and Baseline
3. Landscape Assessment
4. Visual Assessment
5. Impact on the Surrey Hills AONB
6. Assessment of appeal site as a Valued Landscape
7. Conclusions

Tables

Table LHP1 Landscape Receptor Sensitivity

Table LHP2 Magnitude of Impacts and Landscape Effects

Table LHP3 Assessment of the appeal site as a Valued Landscape

Appendix LHP 1

Figure LHP1 Views from the appeal site into the AONB

Figure LHP2 Location of views from the appeal site into the AONB

Figure LHP3 Views from the North Downs Way to the appeal site

Summary

- i. The appeal site is an intact, rural landscape set in the foothills of the North Downs, between the urban edge of north Oxted and the Surrey Hills AONB. It is enclosed by Ancient Woodland and a high hedge and stream to the north and east, with school playing fields, low rise school buildings and leafy detached houses to the south and west. The site contributes positively to the setting of its surroundings and reflects the landscape quality of the adjacent AONB. There is intervisibility between the site and the surrounding AONB. The Zone of Theoretical Visibility (ZTV) in the Environmental Statement (ES) suggests that the appeal site is visible from many parts of its surroundings, much of which is AONB.
- ii. The landscape assessment assesses the value, susceptibility and landscape sensitivity of the identified landscape receptors, and the magnitude of change to these receptors. This gives rise to the predicted effects and their significance; these outcomes are summarised in tabular form and described in the text. Where my assessment differs from that of the ES, I have highlighted the changes in red.
- iii. The visual assessment identifies representative viewpoints; visual receptors are the people who would enjoy these views. These visual receptors are assessed in terms of the value of the view, its susceptibility and sensitivity to change; the magnitude of change to the view is considered together with the sensitivity of the receptors, to give predicted visual effects and their significance. Unlike the landscape assessment, I generally agree with the visual assessment and have not included marked up tables of differences in judgement. I consider that the ZTV is a component of the visual assessment, but its findings are not included in the predicted visual effects.
- iv. The proposed development would have a permanent major adverse effect on the Surrey Hills AONB and on its setting. The scale and extent of the proposals are such that the proposed development would not comply with NPPF para 182.
- v. I fully support the recommendation of Natural England (NE) in their Surrey Hills AONB Boundary Review that the appeal site should be included within the revised Surrey Hills AONB boundary.
- vi. The appeal site complies with my assessment as a Valued Landscape using the factors identified in Table 1 of the Landscape Institute Technical Guidance Note (LITGN) 02/21 Assessing landscape value outside national designations (which supersedes Box 5.1 of the GLVIA3), see Table LHP 3. The site meets all the criteria of a Valued Landscape; I consider that the appeal site should be defined as a Valued Landscape.
- vii. Paragraph 180 of the NPPF states that:
'Planning policies and decisions should contribute to and enhance the natural and local environment by:
protecting and enhancing valued landscapes....
- viii. There would be a major adverse landscape effect on the appeal site, on the Surrey Hills AONB, on the Surrey Landscape Character Area GV4 Merstham to Clacket Lane Greensand Valley, on the Ancient Woodland within the site and on the TPO within the Ancient Woodland.
- ix. There would be moderately adverse landscape effects on Surrey AGLA and on the Surrey Landscape Character Area CR3 Box Hill to Tatsfield Chalk Ridge.
- x. There would be a major adverse visual effect on Visual Receptors at Viewpoint 1

Summary (contd)

- xi. There would be a moderately adverse visual effect on Visual Receptors at Viewpoint 12.
- xii. This appeal site does not have the capacity for a large development of this scale and form. The landscape and visual impacts of the proposed development range include major impacts to highly sensitive landscape and visual receptors.

1. Introduction

1.1 My name is Louise Hooper and I am a Chartered Landscape Architect and Principal of Louise Hooper Landscape Architect (LHLA). I hold a BA (Honours) in Landscape Architecture from Heriot Watt University, Edinburgh and the Edinburgh College of Art.

1.2 I am a Chartered Member of the Landscape Institute, the British organisation for landscape professionals including landscape architects and landscape planners; it was founded in 1929 and was granted a Royal Charter in 1997. I received my Chartered Membership of the Landscape Institute (CMLI) in 1984. My professional membership number is 12077. LHLA is registered practice number 23442.

1.3 I have over 40 years of experience in landscape architecture and landscape planning working in private practice and for local authorities.

1.4 I have provided my expert opinion for the purpose of these proceedings and I am aware of the role required by such an expert.

1.5 I understand that my duty is to the Planning Inspector, and I have complied with that and will continue to do so. I am aware of the requirements and the Guidance for Instruction of Experts to give Evidence.

1.6 I understand that the Civil Procedure Rules (CPR) require me to help the Planning Inspector by providing objective, unbiased opinion on matters which are within my expertise. I understand that this duty overrides any obligation to the organisation from whom I have received my instruction or who will pay my charges.

1.7 I am not aware of any potential conflict of interest.

1.8 I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those within my own knowledge I confirm to be true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

1.9 My report has been prepared following my appointment as an independent expert on landscape matters by Tandridge District Council.

1.10 My instruction was received by email on 22nd August 2024 from Tandridge District Council as a signed Letter of Appointment.

1.11 Prior to this, I made a site visit on 8th August 2024 with Alastair Durkin, Principal Tree Officer, Tandridge District Council and Julian Forbes Laird, Arboricultural Consultant. This enabled me to confirm that my evidence would support the reasons for refusal given by the Council. I have subsequently visited the study area on three occasions, visiting viewpoints, walking and driving along relevant roads and footpaths in order to evaluate the site and its setting within the Surrey Hills AONB.

1.12 Due to the timing of my appointment, I have not prepared a full Landscape and Visual Impact Assessment of the proposed development but have reviewed that prepared by the Appellant in detail.

1. Introduction (contd)

1.13 My proof includes comments on the appeal site and its surroundings, on the landscape assessment, on the visual assessment, on intervisibility between the appeal site and the AONB, the AONB boundary variation, the appeal site as a Valued Landscape and my conclusions.

2. Context

2.1 This section covers the documents used to assess local landscape character, the methodology, an assessment of the appeal site and its surroundings, areas of agreement and disagreement with the ES and areas of concern not covered in the ES.

Landscape character assessments

2.2 Reference has been made to the following landscape character assessments:

- Surrey Landscape Character Assessment Tandridge District (2015)
- Surrey Hills AONB Management Plan 2020-25
- Surrey Hills AONB Landscape Character Assessment (2012)
- Tandridge Landscape Capacity and Sensitivity Study (2016)

Assessment Methodology

2.3 Reference has been made to:

- the Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3)
- the Landscape Institute Technical Guidance Note 2024-01 (LITGN 2024-01) Notes and Clarifications on Aspects of GLVIA3
- the Landscape Institute Technical Guidance Note 02/21 (LITGN 02/21) Assessing landscape value outside national designations.

Appeal site

2.4 The appeal site lies in the foothills of the wooded chalk scarp of the North Downs which forms the backdrop to the site.

2.5 The site comprises a single irregular field of pasture with Grade 3 Agricultural Land Classification and an L-shaped shaw of Ancient Woodland on the north and northwest boundaries. To the northeast is a stream, thick hedgerow and hedgerow trees. The historic 1910 map shows a field boundary extending south from the southern tip of the Ancient Woodland to the small woodland but this has since been lost.

2.6 The site is flanked by school playing fields and tennis courts to the east and west and by a small woodland to the south (which forms two boundaries of this irregular shaped site) Schools back onto the site next to the playing fields with six houses backing onto a short length of the site boundary to the west. Farmed fields lie to the north and east of the site.

2.7 These rural surroundings extend the perception of the rural setting and remoteness from the urban area.

2.8 The topography of the site is gently undulating between +/-103m aod and +/-120m aod. The high point of the site is near the small wood to the south with the low point at the eastern corner. The western part of the site slopes north while the rest of the site slopes east or southeast.

2.9 The Vanguard Way/Oxted Link follows the eastern site boundary. It is a 106km long distance trail extending from Croydon to Newhaven on the Sussex coast, over the North Downs, the Greensand Ridge and Ashdown Forest. The section adjacent to the appeal site is known as the Oxted Link and follows public right of way (PRoW) 75 which is a well-used and popular footpath connecting Oxted and the AONB.

2. Context (contd)

2.10 At the time of the site visit the hedgerow between PRow 75 and the site was thick and offered no views into the site. During the winter when there is less leaf cover there may well be filtered views into the site from the public footpath.

2.11 An unofficial footpath/desire line runs parallel to the PRow and enters the site through the Ancient Woodland. There is no PRow through the site.

2.12 The field pattern is a historic one of large irregular assarts with wavy or mixed boundaries, likely to be evidence of late medieval or Tudor woodland clearance. Historic maps from 1871 show a series of interconnected assarts extending to the east and south from Chalkpit Woods as far as the stream on the eastern site boundary.

2.13 The riparian stream on the eastern boundary flows into the River Eden; it is a seasonal stream (dry at time of site visit in August 2024) and the site is part of the Upper Eden Catchment. The Eden Catchment provides 85% of the water used by SES Water.

2.14 The parish boundary between Oxted and Limpsfield Parishes follows the stream course on the eastern site boundary.

2.15 The landscape pattern of the site is intact and its condition is good; it contributes positively to the setting of its surroundings and reflects the landscape quality of the adjacent Surrey Hills AONB.

Context and surroundings of the appeal site

2.16 The appeal site sits between the urban edge of north Oxted and the rolling open farmland of the Greensand Valley which rises steeply into the North Downs.

2.17 To the north and east of the site is farmland. The field immediately to the north of the site is similarly assarted and enclosed by woodland and thick hedges.

2.18 The Surrey Hills AONB includes the Ancient Woodland along the northern site boundary and wraps around the northern and eastern sides of the site. The site forms part of the setting of the AONB

2.19 There are distant views from the appeal site to the AONB to the north, northeast and northwest.

2.20 There are southerly views from the eastern end of the appeal site of Oxted School and playing fields.

2.21 From the western end of the site there are views of the backs of detached houses in Chichele Road and glimpsed views of St Mary's Primary School.

2.22 The site is +/-0.5km from the M25, which is in cutting at this point and +/-15m higher than the site. At the time of my site visit noise from the M25 was a low distant hum. In August there was no noise from the schools.

2. Context (contd)

Areas of agreement with ES

2.23 I generally agree with the Policy Context, Assessment Methodology, Significance Criteria, delineation of Study Area and the ZTV, definition of Landscape Receptors and Visual Receptors and the Summary of Visual Effects in the ES. I support the principle of mitigation embedded into the project design.

2.24 I generally agree with the value judgement of the Landscape Receptors in the ES

Areas of disagreement with ES

2.25 I disagree with the assessments of some Landscape Receptors in terms of susceptibility. This is explained in more detail in Section 3 Landscape Assessment.

2.26 The judgement on the sensitivity of the landscape receptors is a product of the judgements on value and susceptibility; altering one of these judgements has an effect on the combined judgement of sensitivity.

2.27 The judgement on the predicted landscape effects of the proposed development is based on the magnitude of the change magnitude and sensitivity of the landscape receptor; altering one of these judgements again has an effect on the combined judgement of significance of likely effects.

2.28 I disagree with the assessments of some Landscape Receptors in terms of sensitivity and magnitude of change, with the resulting outcome that I disagree with the statement of potential landscape effects in the ES.

Intervisibility and new areas of concern

2.29 The ES does not cover the topic of intervisibility.

2.30 From within the appeal site there are views into the AONB to the north, to the northeast and to the northwest, see LHP Figure 1 and Figure 2.

2.31 The ES does cover visibility of the appeal site from within the AONB in its selection of view-points. However it does not acknowledge the Zone of Theoretical Visibility (ZTV, Figure D5 of the ES) which shows three areas of high visibility (more than 66%) to the east and northeast of the appeal site and to the north of Limpsfield village; it shows several areas of moderate visibility (34% to 66%) to the east and northeast of the appeal site, at South Hawke/Gangers Hill, above the quarry near Southview Road, in Beech Plantation, west of Tatsfield Court Farm, south of the Pilgrim's Way between Pilgrim's Farm and Rowtye Wood, west of Broomlands Farm and north of Hookwood, Limpsfield. It shows many areas of low visibility (up to 33%) which give the impression of extending across most of the ZTV.

2.32 The ZTV suggests that the appeal site is visible from many parts of the surrounding area, much of which is AONB. This is explained in more detail in Sections 3, 4 and 5.

3. Landscape Assessment

3.1 A landscape assessment uses a baseline of the current character, condition and value of the landscape to predict and describe the effects of an identified change and development on that landscape. The significance of the landscape effects is assessed and measures to mitigate any adverse effects are considered.

Baseline Study

3.2 A baseline study for assessing landscape effects requires desk study and field work to identify local landscape character, key elements including physical influences such as geology, soils, topography and hydrology, landcover including tree cover and vegetation, human activity including land use, field pattern and settlement pattern. Features which give the landscape its local distinctiveness such as scale, complexity, tranquillity or remoteness and an understanding of the functions of a healthy landscape in terms of ecosystem services.

3.3 A study area has been proposed which includes the ZTV (see section 3 Visual Assessment for an explanation) together with the M25 for the length of the ZTV, an area of Oxted northeast of the railway, the A25/B2025 and then extended from Limpsfield High Street to Titsey Wood which it follows to Clacket Lane Service Station where it heads north to join the ZTV.

Landscape Receptors

3.4 Landscape receptors are the components of the landscape that are likely to be affected by the proposed development. These can include landscape character areas, key features or characteristics and specific aspects such as tranquillity. They are identified and then assessed in terms of their landscape value, their susceptibility to the specific change which would result from the proposed development and their sensitivity to that change.

Sensitivity of Landscape Receptors

3.5 In Table LHP1 I have reproduced Table D4.1 from the ES with some differences (highlighted in red) and explanatory rationale where changes are made

3.6 The Landscape Institute's Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (LITGN-2024-01) redefines susceptibility in line with the Oxford English Dictionary as:

'The quality or condition of being susceptible; capability of receiving, being affected by, or undergoing something'

This definition implies that a higher susceptibility would mean more liable to be harmed by a particular thing and replaces a more ambiguous definition given in GLVIA3.

3.7 The Receptor 'Local landscape condition' identified in the ES has been replaced by 'Local Valued Landscape' as described in Section 6 and Table LHP 3.

3.8 The Receptors 'Scenic Quality' and 'Tranquillity' have both been qualified by adding 'of the Study Area'

Receptor	Value	Susceptibility	Sensitivity	Rationale
Surrey Land- scape Character Area GV4 Mer- stham to Clacket Lane Greensand Valley	High	High (Medium in ES)	High (Medium/ high in ES)	Highly valued landscape, con- sidered highly susceptible to change
Surrey Land- scape Character Area CR3 Box Hill to Tatsfield Chalk Ridge	High	High (Medium in ES)	High (Medium/ high in ES)	Highly valued landscape, predominantly AONB, con- sidered highly susceptible to change
Local Valued Landscape (the appeal site)	High (medium in ES)	High (medium in ES)	High (medium in ES)	As per Valued Landscape As- sessment in Table LHP3 ES refers to pub- lished capacity & sensitivity study
Scenic quality (of the Study Area)	High	High (Medium in ES)	High (Medium/ high in ES)	Over 80% of study area is rural, important views north to wooded chalk scarp,
Tranquility (of the Study Area)	Medium/ high (Medium in ES)	High (Low in ES)	Medium/high (Me- dium/low in ES)	Some localised & periodic noise but generally tranquil

Table LHP1a Landscape Receptor Sensitivity

Receptor	Value	Susceptibility	Sensitivity	Rationale
Surrey Hills AONB The North Downs: Scarp and Holmesdale	High	High (Medium in ES)	High (Medium/ high in ES)	Highly valued landscape, considered highly suscep- tible to change
Surrey Hills AGLV	High	Medium	Medium/high	No change
Ancient Wood- land within the site	High	High (Medium in ES)	High (Medium/ high in ES)	Highly valued habitat, considered highly suscep- tible to change
TPO 7/2013/TAN	High	High (Medium in ES)	High (Medium/ high in ES)	In Ancient Woodland, highly valued considered highly susceptible to change
TPO 8/2013/TAN & TPO 5/2013/ TAN	Medium	Low	Medium/low	No change

Table LHP1b Landscape Receptor Sensitivity

3. Landscape Assessment (contd)

Magnitude of landscape effects on Landscape Receptors

3.7 The magnitude of change is the scale, extent and duration of change to a landscape arising from the proposed development.

3.8 In Table LHP 2 I have reproduced Table D5.1 from the ES with some differences (highlighted in red) and explanatory rationale where changes are made.

<i>Receptor</i>	<i>Sensitivity</i>	<i>Magnitude</i>	<i>Significance</i>	<i>Nature</i>	<i>Rationale</i>
Surrey Landscape Character Area GV4 Merstham to Clacket Lane Greensand Valley	High (Medium/high in ES)	Medium/ low (Negligible in ES)	Moderate (Negligible in ES)	Permanent, Adverse	Northern section at eastern end lies within the Surrey Hills AONB. +/-50% GV4 lies within the ZTV.A medium/ low magnitude of change would result in a moderate adverse impact
Surrey Landscape Character Area CR3 Box Hill to Tatsfield Chalk Ridge	High (Medium/high in ES)	Medium/ low (Negligible in ES)	Moderate (Negligible in ES)	Permanent, Adverse	Highly sensitive landscape, lying fully within the Surrey Hills AONB, but only 45% within ZTV with a medium/ low magnitude of change resulting in a moderate adverse impact
Local Valued Landscape (the appeal site)	High (Local landscape condition was assessed medium in ES)	High	Major	Permanent, Adverse	Highly sensitive landscape, with a high magnitude of change resulting in a major adverse impact
Scenic quality of study area	High (Medium/high in ES)	Low (Negligible in ES)	Minor (Negligible in ES)	Permanent, Adverse	A low magnitude of change to a receptor of high sensitivity would give rise to a moderate adverse impact

Table LHP 2a Magnitude of Impacts & Predicted Effects on Landscape Receptors

3. Landscape Assessment (contd)

<i>Receptor</i>	<i>Sensitivity</i>	<i>Magnitude</i>	<i>Significance</i>	<i>Nature</i>	<i>Rationale</i>
Surrey Hills AONB The North Downs: Scarp and Holmesdale	High (Medium/high in ES)	High (Negligible in ES)	Major (Negligible in ES)	Permanent, Adverse	Highly sensitive landscape, with a high magnitude of change resulting in a major, permanent adverse impact
Surrey Hills AGLV	High (Medium/high in ES)	Medium (Negligible in ES)	Major (Negligible in ES)	Permanent, Adverse	Highly sensitive landscape, with a medium magnitude of change resulting in a major, permanent adverse impact
Ancient Woodland within the site	High (Medium/high in ES)	Medium/high	Major (Low in ES)	Permanent, Adverse	Highly sensitive landscape, with a medium/high magnitude of change resulting in a major, permanent adverse impact
TPO 7/2013/TAN	High (Medium/high in ES)	Medium/high (Low in ES)	Major (Low in ES)	Permanent, Adverse	Highly sensitive landscape feature, with a medium/high magnitude of change resulting in a major, permanent adverse impact
TPO 8/2013/TAN & TPO 5/2013/TAN	Medium/low	Low	Minor	Permanent, Adverse	No change

Table LHP 2b Magnitude of Impacts & Predicted Effects on Landscape Receptors

Assessment of Landscape Effects

3.9 The assessment considers and describes the main landscape effects resulting from the proposed development. The narrative text demonstrates the reasoning behind the judgements concerning the landscape effects of the proposals. The text is supported by Tables xxx which summarise the sensitivity of the landscape, the magnitude of change and the resulting landscape effects.

Mitigation and Residual Effects

3.10 Mitigation measures are described as those measures, including any process or activity, designed to avoid, reduce and compensate for adverse landscape effects resulting from the proposed development.

3.11 In situations where proposed mitigation measures are likely to change over time, as with planting to screen a development, it is important to make a distinction between any likely effects that will arise in the short term and those that will occur in the long-term or 'residual effects' once mitigation measures have established.

4. Visual Assessment

4.1 This section considers the likely visual effects of the proposed development. Visual effects are concerned with people's views of the landscape and the change that would occur to that view.

Visual baseline

4.2 The baseline for a visual assessment should identify the area from which the development may be visible and the different groups of people who may have views of the development from public rights of way (PRoWs).

Study Area

4.3 The study area for the visual assessment has been taken as the extent of possible visibility of the proposed development or Zone of Theoretical Visibility (ZTV).

Visual receptors

4.3 Visual receptors in the ES have been taken as the 13 representative viewpoints (VPs). Ten of these (VP1 to VP10) are taken from PRoWs and represent the views of walkers or cyclists using the footpaths or National Trails. These visual receptors are likely to be moving relatively slowly and to be in that location to enjoy the surroundings; the value of the views is assessed to be high as much of the view is within an AONB; the susceptibility of the visual receptors is assessed to be high as people who are engaged in outdoor recreation whose attention is on the view.

4.4 Three of the viewpoints (VP11 to VP13) have been taken from residential roads close to the site. They represent the views of local residents and drivers using the local roads. The value of the views is assessed to be low, the susceptibility of the visual receptors is assessed to be high.

4.5 The sensitivity of the visual receptor is derived from combining the judgements of value and susceptibility; in this case the visual receptors of VPs 1 to 10 are judged to have a high sensitivity which reflects a highly attractive view with a lack of discordant features. The visual receptors of VP11 to VP13 are judged to have a medium sensitivity, enjoying an attractive view with some limited discordant features.

Visual effects

4.6 The appeal site is enclosed on almost all boundaries by thick, high hedges and woodland. There are limited views into the eastern end of the site from the grounds of Oxted School and into the western end of the site from the rear of some properties in Chichele Road, but neither of these locations is publicly accessible, so is not included in this assessment.

4.7 The proposed development would not be visible from VP2 to VP10, so the magnitude of change to these views would be negligible, as would the significance of the visual impact.

4.8 There would be filtered views of roof tops over the intervening hedge from VP1; there is likely to be more visibility including light spill during the winter months when there is less leaf cover and there would be a strong likelihood of filtered views of the proposed development through the hedge; this would give rise to a high magnitude of change and a major adverse visual impact.

4. Visual Assessment (contd)

4.9 There would be glimpsed views of the proposed development from VP11 and VP13, giving rise to a low magnitude of change to the view and a minor adverse visual impact.

4.10 For VP12 there would be a noticeable change in the view along the new access road to the proposed development. This would give rise to a medium magnitude of change to the view, and a moderately adverse visual impact.

Mitigation

4.11 It may not be possible to mitigate the impact on views from Oxted or from the AONB.

5. Impact on the Surrey Hills AONB

The importance of the AONB

5.1 The current AONB boundary wraps around two sides of the site, to the north and to the east.

5.2 It makes an important contribution to the site setting by bringing the wooded foothills of the chalk scarp right down to the site. This sweeping landscape backdrop gives the site a strong sense of identity and local distinctiveness.

5.3 There are long views from the site to the north and northwest into the Surrey Hills AONB and to the northeast into the Kent Downs AONB which influence the site character and emphasise its rural setting. See LHP Figure 1 for photographs of these views.

5.4 The NPPF para 182 states:

Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.

Intervisibility

5.5 There is intervisibility with the AONB to the north, northeast and northwest of the site. The western part of the site slopes in a northwesterly direction so has a particularly strong relationship with the surrounding AONB.

5.6 The visual baseline fieldwork was carried out in August 2024. The site was visited on 8th August; subsequently public rights of way within the AONB were walked to test the visibility of the site at pedestrian eye level.

5.7 Using inter-visibility from within the site and a pair of binoculars, cross referenced with the OS Explorer map, we targeted potential viewpoints and visited each, seeking out potential views along key roads and public footpaths and byways.

5.8 As the field work was undertaken in the summer, it was noted that intervisibility was likely to improve during the winter months when there is less vegetation on the trees and hedgerows. There were a number of impediments to views which are typical of this landscape – in particular, high hedges and thick woodland.

5.9 There are occasional glimpsed views of the site from the Vanguard Way/Oxted Link, where it climbs past the eastern site boundary and from the North Downs Way above the M25, there are distant views of the site to the south of the Titsey Plantation.

5.10 The ZTV in the ES identifies areas of low visibility (up to 33%), moderate visibility (34% to 66%) and high visibility (over 66%). This is a computer-generated outcome and denotes theoretical rather than actual visibility. However, it shows that there is a level of likely visibility of the appeal site throughout much of the Surrey Hills AONB.

5. Impact on the Surrey Hills AONB (contd)

The setting of the AONB

5.11 The site forms part of the setting to the AONB. This part of the AONB extends right up to the urban edge of Oxted to the west and to the village of Limpsfield to the east of the site.

5.12 There are long views from the Greensand Way in the AONB as it descends from the chalk scarp towards Oxted over the M25, across the greensand valley and the site and the settlement of Oxted towards Limpsfield Chart.

5.13 There are fine long views from the North Downs Way in the AONB over the M25, the site and the settlement of Oxted and across the Greensand Valley towards Limpsfield Chart, Pains Hill and Dry Hill.

Surrey Hills AONB Boundary Review

5.14 Natural England (NE) published their Final Report in July 2024 on the Consultation Analysis Report of the Surrey Hills AONB Boundary Variation Project . The Appeal Site is one of many sites included in the consultation and review process, and is identified in the study as Oxted, Land North of Park Road. NE also included a field to the east of the site in Land North of Park Road.

5.15 The description of the site in the Boundary Review is as follows:

'This area forms three pastoral fields on the edge of Oxted abutting the urban edge. These fields form part of a sweep of open countryside, and are contiguous with the existing AONB, and have views to the North Downs. To the west, there is a further irregular field which is contained by mature hedges and woodland shaws. Although close to the urban area, this latter area retains a strongly rural character.'

5.16 In responding to public comments, NE states:

'There are many examples where the AONB extends up to and abuts the urban edge.'

5.17 In a review of minor boundary anomalies, NE states that

'The land in question relates strongly to the wider AONB forming part of a sweep of qualifying land.'

5.18 NE undertook an assessment of the natural beauty of the site, taking into account the wider landscape of which it is a part.

5.19 NE notes that:

'the topography of the land is gently undulating and has visual connections to the wider AONB landscape, forming part of a wider sweep of qualifying land.'

And that:

'The ancient woodland which flanks the northern and western boundaries...makes an important contribution to the character and qualities of the area.'

5.20 NE acknowledges that:

'the metal fencing delineating the playing fields of Oxted School (to the south) has a more urbanising influence, however it also notes that the presence of the playing fields means built development is set back and at a lower elevation, such that it recedes and does not significantly undermine the condition or integrity of the area.'

5. Impact on the Surrey Hills AONB (contd)

5.21 NE Guidance makes it clear that decisions on a boundary need to be made consistently along its length (para 9.3). Given that the AONB boundary extends up to the urban edge to the north and includes similar assarted fields...NE is of the view that the inclusion of this land, given its similar qualities and characteristics, is justified. NE considers this is a consistent approach to this boundary in this context.

5.22 Approval of the proposed residential development which is the subject of this appeal would prejudice the future designation of the site.

5.23 I fully support the proposed Surrey Hills AONB boundary review and consider that the appeal site embraces the characteristics and qualities of the adjoining AONB and should be designated.

Compliance with NPPF paragraph 182

5.24 The impact of the proposed development on the AONB and its setting is described in detail in Section 3 of this proof under Landscape Assessment. It is useful however to repeat that the proposed development would have a permanent major adverse effect on the Surrey Hills AONB and on its setting. The scale and extent of the proposals are such that the proposed development would not comply with NPPF para 182.

6. Appeal site as a Valued Landscape

6.1 Landscape and visual assessment is the key process which informs a judgement on how valued a landscape is. An understanding of the inherent character of a site and the contribution it makes to the surrounding landscape character is part of the landscape assessment process which can appraise landscape sensitivity and landscape value.

6.2 Establishing the value of the landscape extends beyond designation. The relative value of a landscape will differ to different stakeholders: for example, a farmer may be concerned over the value of the soil, a dog-walker may be concerned over the quality and quantity of local footpaths, a local resident may be concerned about outlook and tranquillity, and a visitor may be concerned over views, signage, car parks and access.

6.3 Landscape Institute Technical Guidance Note (LITGN) 02/21 Assessing landscape value outside national designations provides the most recent information and guidance on the judgement of landscape value, and the interpretation of the term 'valued landscape' as used in the (England) National Planning Policy Framework (NPPF).

6.4 LITGN 02/21 is intended to supplement and complement existing guidance on landscape value found in the Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3) (Box 5.1).

6.5 A Valued Landscape is an area defined in LITGN 02/21 as having sufficient landscape qualities to elevate it above other more everyday landscapes.

6.6 Table LHP3 sets out factors, indicators and evidence for an appraisal of the Appeal Site as a Valued Landscape. The site contains a number of key features which provide strong evidence for its definition as a Valued Landscape:

- Natural heritage
- Cultural heritage
- Landscape condition
- Distinctiveness
- Recreational opportunities
- Landscape quality and attractiveness
- Tranquillity and remoteness
- Function

6.7 Each of these assets has its own role in contributing to a Valued Landscape, so a ranking of priority or a scoring system would be unhelpful.

6.8 The appeal site meets all the criteria a Valued Landscape; I consider that the appeal site should be defined as a Valued Landscape.

6.9 Paragraph 180 of the NPPF states that:

'Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes....

6.10 I fully support NE's view that the site and surroundings should be designated as an AONB.

6. Appeal site as a Valued Landscape (contd)

<i>Factor</i>	<i>Definition</i>	<i>Indicators of landscape value</i>	<i>Evidence of landscape value</i>
<i>Natural heritage</i>	Landscape with clear evidence of ecological or other interest which contributes positively to the landscape	A landscape which contains valued natural capital assets which contribute to ecosystem services and a sense of place	Ancient Woodland to north, riparian water course on eastern boundary, historic native hedgerow and hedgerow trees, Surrey's Wealden Greensand biodiversity opportunity area WG11
<i>Cultural heritage</i>	Landscape with clear evidence of historical interest which contributes positively to the landscape	Field pattern	Large irregular assarts with wavy or mixed boundaries likely to be evidence of woodland clearance perhaps in late medieval or Tudor period
<i>Landscape condition</i>	Landscape which is in a good physical state (individual elements and overall landscape structure)	Condition of field and boundaries	Intact historic field pattern, traditionally farmed pasture, strong boundaries of woodland and native hedgerow to north and east, well maintained school and back garden boundaries to south and west
<i>Distinctiveness</i>	Landscape that has a strong sense of identity	Makes a positive contribution to the local area	Makes an important contribution to the character of Oxted by bringing the foothills of the chalk scarp right down to the back gardens of north Oxted.
<i>Recreational</i>	Landscape offering recreational opportunities	PRoWs and national long distance trails	PRoW 75 is the Vanguard Way/Oxted Link and follows the eastern site boundary from the town centre up onto the chalk scarp of the AONB with its ancient trails and trackways such as the Pilgrims' Way and the North Downs Way. It is an important route for local residents into the countryside and the AONB.
<i>Landscape quality & attractiveness</i>	Landscape that appeals to the visual senses	Distinctive features and landform	Strong woodland belt and distant views sweeping up to the wooded chalk scarp of the AONB.
<i>Perception (remoteness & tranquillity)</i>	Landscape with a strong perceptual value such as distance from urban areas, tranquillity and dark skies	Peace and quiet, lack of urban features and remoteness	Northern part of site feels far removed from urban area, rural farmland and woodland, birdsong can be heard. Southern boundaries shared with residential area and schools but provides a vital transition zone from urban area into the countryside. Some periodic noise from local schools, occasional noise from M25
<i>Function</i>	Landscape with a clearly identifiable function	Elements contributing to the healthy functioning of the landscape	Part of the Upper Eden Catchment, healthy soils provide a carbon sink, ancient woodland provides rich biodiversity supporting a variety of species.

Table LHP3

Assessment of the site as a Valued Landscape

7. Conclusions

7.1 I disagree with the statement of potential landscape effects in the ES.

7.2 The ZTV has not been fully explained: it suggests that the appeal site is likely to be visible from many parts of the surrounding area, much of which is AONB.

7.3 The character of the study area is over 80% rural, well wooded and tranquil. Although the M25 is a noticeable detractor in some parts of the study area, its noise and visibility is localised and does not adversely affect the appeal site.

7.4 The appeal site is rural in character, currently pasture surrounded by woodland, thick hedges and working farmland; it sits in the foothills of the chalk scarp which rises up steeply into the North Downs.

7.5 There would be a major adverse landscape effect on the appeal site, on the Surrey Hills AONB, on the Surrey AGLV, on the Ancient Woodland within the site and on the TPO within the Ancient Woodland.

7.6 There would be moderately adverse landscape effects on GV4 and on CR3.

7.7 There would be a major adverse visual effect on Visual Receptors at Viewpoint 1.

7.8 There would be a moderately adverse visual effect on Visual Receptors at Viewpoint 12.

7.9 The appeal site forms part of the setting for the AONB; there is strong intervisibility between the site and the AONB.

7.10 The proposed development would have a permanent major adverse effect on the Surrey Hills AONB and on its setting. The scale and extent of the proposals are such that the proposed development would not comply with NPPF para 182.

7.11 The appeal site should be included within the Surrey Hills AONB as part of the boundary review.

7.12 The site has been assessed and is fully compliant with the qualities and characteristics to be defined as a Valued Landscape.

7.13 The proposed development would have a permanent major adverse impact on a Valued Landscape. It would not comply with NPPF para 180e.

7.14 This appeal site does not have the capacity for a large development of this scale and form. The landscape and visual impacts of the proposed development range include major impacts to highly sensitive landscape and visual receptors.

Tandridge District Council

Landscape Proof of Evidence of Louise Hooper,
BA (Hons), L Arch, CMLI

Appendix LHP1

Town and Country Planning Act 1990 Appeal by Cala Homes (Southern
Home Counties), Land at Chichele Road, Oxted, Surrey, RH8 0NZ

PINS Appeal Ref No.: APP/M3645/W/24/3345915
LPA Ref No.: TA/2023/1345



View A north from the southern end of the Ancient Woodland towards Titsey Plantation and Botley Hill in the Surrey Hills AONB



View B northeast past the eastern end of the Ancient Woodland towards Hogtrough Hill above Westerham and Brasted in the Kent Downs AONB

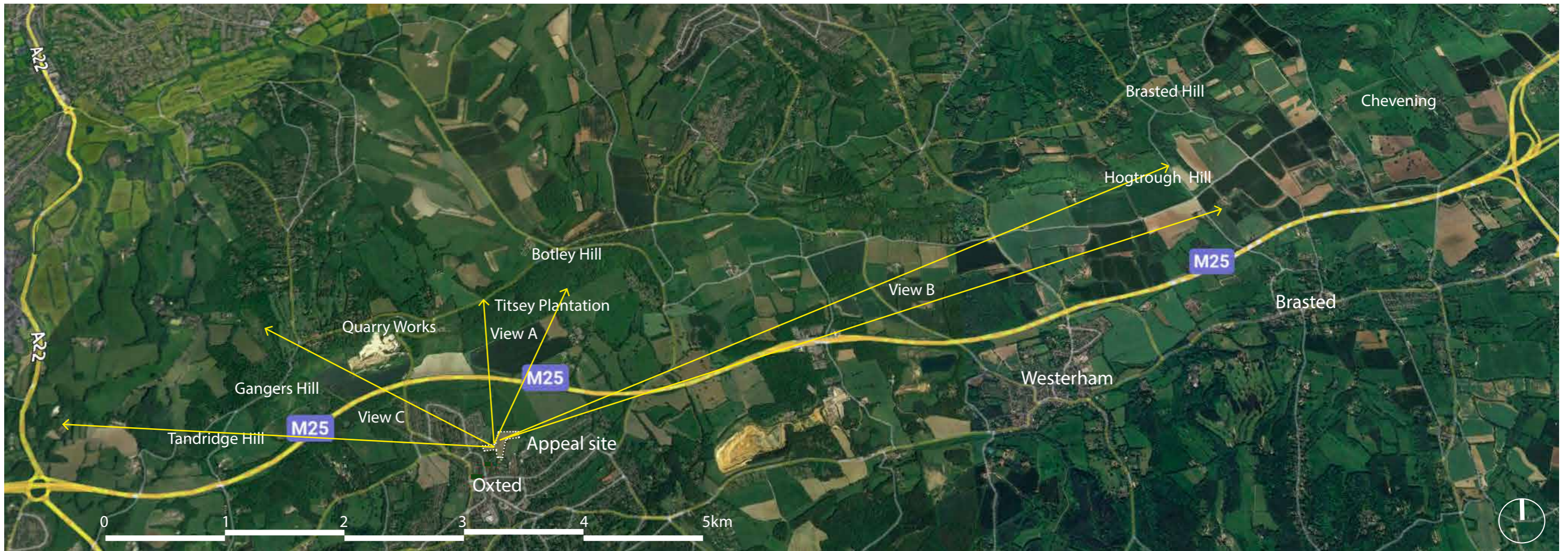


View C northwest past the southern end of the Ancient Woodland towards quarry works, Tandridge Hill and Gangers Hill in the Surrey Hills AONB

Figure 1 Views into the AONB from Land at Chichele Road, Oxted, Surrey RH80NZ

Land at Chichele Road Oxted
LH Proof of Evidence
September 2024





Location of Views A, B and C from the appeal site into the surrounding AONB

Figure 1 Views into the AONB from Land at Chichele Road, Oxted, Surrey RH80NZ



View across the appeal site from the North Downs Way within the Surrey Hills AONB taken near the Meridian Line

Figure 3 Views across the appeal site from the North Downs Way

Land at Chichele Road Oxted
LH Proof of Evidence
September 2024

