

**Landscape and Visual Appraisal – Reigate and Banstead
Borough Council’s Proposed Sustainable Urban
Extension Sites**

**Reigate and Banstead Borough Council Development Management
Plan**

October 2018

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This document has been prepared and checked in accordance with ISO 9001:2008

1.0 Introduction

1.1.1. This report provides a landscape and visual appraisal (LVA) in relation to proposed Sustainable Urban Extension (SUE) allocations in the Reigate and Banstead Borough Council (RBBC) Development Management Plan.

1.1.2. Each site is considered individually, with the appraisal including the some or all of the following information as appropriate to the scale, location of the site, and potential impacts of development:

- A Zone of Theoretical Visibility (ZTV) study - modelling the potential visibility of development at 8.5m high within the site;
- A review of reports prepared to date by RBBC and promoters of the site;
- An appraisal of the site and potential landscape and visual effects – based on desk study and site visits;
- An appraisal of potential effects on the Surrey Hills Area of Outstanding Natural Beauty (AONB)– informed by the above and through discussion with the AONB management team.

Sites

1.1.3. The sites and relevant policy references covered by this LVA are:

- ERM1: Land at Hillsbrow, Redhill;
- ERM2/3: Land west of Copyhold Works and Former Copyhold Works;
- ERM4a: 164 Bletchingly Road, Merstham;
- ERM4b: Land west of Bletchingly Road, Merstham;
- ERM5: Oakley Farm, off Bletchingly Road, Merstham;
- SSW2: Land at Sandcross Lane, South Park, Reigate;
- SSW6: Land west of Castle Drive;
- SSW7: Hartswood Nursery;
- SSW9: Land at Dovers Farm, Woodhatch, Reigate;
- NWH1: Land at Meath Green Lane, Horley;
- NWH2: Land at Bonehurst Road, Horley; and
- SEH4: Land off The Close and Haroldsea Drive, Horley.

2.0 Background documentation

This LVA considers the findings of each of the documents below in terms of the content that covers the proposed SUE allocations. Each of these documents has been written and published by RBBC and submitted to P{INS as part of the Council's Submission DMP.

2.1. Sustainable Urban Extensions: Broad Geographic Locations Technical Report (November 2012)

2.1.1. The Technical Report presents the Council's methodology and results of a study undertaken by the Council to identify and prioritise broad locations for potential sustainable urban extension sites within the Borough, based on a wide range of criteria. Landscape matters taken into account by the Council include:

- Constraints: Surrey Hills AONB and Registered Parks and Gardens;
- Whether development in that area would continue to protect or enhance the landscape character and features;
- Contribution to Green Belt purposes – by preferring non Green Belt sites and considering the contribution where Green Belt sites were identified;
- Amenity and access.

2.1.2. The report's conclusions informed the identification of the Council's 'broad areas of search' as set out within RBBC's adopted Core Strategy (2014). The report analysed 20 areas (A-T) which adjoin existing settlement, narrowing this down to five areas, which include the sites considered within this LVA as follows:

- Area O: North West of Horley – NWH1 and NWH2;
- Area P: South East of Horley – SEH4;
- Area J: East of Redhill – ERM1 and ERM2/3;
- Area K: East of Merstham – ERM4a, ERM4b and ERM5;
- Area G: West of Woodhatch – SSW2, SSW6 and SSW7.

2.1.3. SSW9 lies within Area H, immediately adjacent to Area G.

2.1.4. The observations and recommendations in respect of each site are considered within sections 3.0 - 14.0 below.

2.2. Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report (June 2016)

2.2.1. The Stage 2 report defined 33 land parcels within each of the areas of search and considered them further in respect of a range of criteria. In respect of landscape and visual matters, this included:

- The presence of national or local landscape designations;
- Historic landscape features;
- Topography and landform;
- Long range views;
- Recreational use including public rights of way and informal use.

2.2.2. Key design considerations for each site included:

- Use of historic field patterns to inform structure and layout;
- Retention of listed buildings and those which contribute to local character;
- Density and site capacity to allow for soft edges and transition to countryside;
- Protecting the character of country lanes.

2.2.3. The document was also informed by the Council's Green Belt Review (June 2016) for each land parcel looked at the extent to which each land parcel (including rural surrounds of Horley) fulfils the NPPF's Green Belt purposes and ranks the sites in terms of their importance for continued protection (5 = lowest, 1 = highest). In the Green Belt Review, *"land around Horley (currently known as the rural surrounds of Horley) was also separated into land parcels and considered ... to inform the identification of potential development sites by providing evidence to identify those areas of land which play a more important role in maintaining settlement separation and preventing sprawl and/or most demonstrate the intrinsic beauty and character of the countryside."*

2.2.4. From this study, 11 land parcels were recommended to be taken into Regulation 18 consultation. At this stage, ERM2 and ERM3 were treated as separate land parcels; ERM4 was a single parcel (later to be split into 4a and 4b); and SSW6 was included as part of SSW7. The observations and recommendations in respect of each site are considered within sections 3.0 - 14.0 below.

2.3. RBBC Development Management Plan Regulation 18 Consultation (August 2016)

- 2.3.1. Each of the sites identified within the Stage 2 report outlined above was put forward as draft policy. In each case, the policy provides a site plan and description; a brief summary of the evidence base; an indication of the development potential and likely requirements; and an illustrative masterplan.
- 2.3.2. Along with the reports discussed at 2.1 and 2.2 above, the evidence base included a Sustainability Appraisal (June 2016) which considered landscape and visual matters amongst other factors and informed the draft policy. The draft policy in respect of each site is considered within sections 3.0 - 14.0 below.

2.4. Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report Boundary Strength Addendum (October 2017)

- 2.4.1. A brief report building on the consideration of Green Belt matters in the Stage 2 report, this was undertaken after the completion of Regulation 18 consultation. It considers the strength of the Green Belt boundary for each site.
- 2.4.2. The observations and recommendations in respect of each site are considered within sections 3.0 - 14.0 below.

2.5. Development Management Plan Regulation 19 Consultation (January 2018)

- 2.5.1. Policy for each of the sites identified within the Regulation 18 report was refined following Regulation 18 consultation and consulted upon during Regulation 19 consultation (Jan 2018). In each case, the policy provides a site plan and description; an indication of the development potential and likely infrastructure, design and mitigation requirements; and a rationale to support these.
- 2.5.2. The evidence base also included an updated Sustainability Appraisal (October 2017) for which criterion 15 considers the sustainability of each proposed SUE in terms of whether landscape character would be protected or enhanced. The Sustainability Appraisal was re-issued with minor updates in May 2018 but these changes did not alter the findings in respect of landscape and visual matters.

2.5.3. The draft policy in respect of each site is considered within sections 3.0 - 14.0 below.

2.6. Site specific representations

2.6.1. Site specific representations in respect of landscape and visual matters were received from at Regulation 18 and regulation 19 consultation stages – these are reviewed in respect of those sites where relevant representations are available.

2.7. Natural England response to Regulation 19 Consultation in respect of the proposed SUE sites (Representor no. 0120)

2.7.1. Natural England made the following comments in respect of SUE sites:

“Policy ERM4a, Policy ERM4b, Policy ERM5 - Natural England note that these sustainable urban extension allocations all sit within the setting of the Surrey Hills Area of Outstanding Beauty (AONB). Natural England advise that a Landscape and Visual Impact Assessment is completed, and appropriate mitigation measures considered where necessary, in order to assess the significance of any potential impacts on the special qualities of the AONB. We also recommend speaking to the AONB unit; their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB’s statutory management plan would be a valuable contribution to this assessment process. Completing this assessment would improve the soundness of the Development Management Plan document.

Policy ERM1 - We note that this allocation site includes an area of ancient woodland which has been referenced within the design approach and mitigation requirements section. We recommend that you use Natural England’s standing advice on ancient woodland in order to further inform these measures.

...”

2.7.2. This Landscape and Visual Appraisal (LVA), and the process of its preparation, which has included meetings with the Surrey Hills AONB Unit are intended to address the comments in respect of ERM4a, ERM4b, and ERM5 – see sections 5-7 of this LVA. Although not specifically requested by Natural England, sites ERM1 and ERM2/3 have been considered in the same way, given that they lie within 2km of the AONB (see sections 3 and 4 of this LVA).

2.7.3. The response regarding site ERM1 and Ancient Woodland is considered at section 3.4 of this LVA.

- 2.7.4. The Natural England response also included comments on policy RED9 and comments regarding ERM2/3 and ERM4a in respect of SNCI sites, which are not within the scope of this LVA.
- 2.7.5. During the process of preparing this appraisal, a meeting was held with Clive Smith (Surrey Hills AONB Planning Advisor). At that meeting, matters in relation to the concerns raised by Natural England were discussed and subsequently Mr Smith submitted the following response:

“The AONB issue with regard to the above sites ERM4a, ERM4b and ERM5 is whether being near the Surrey Hills AONB their proposed development would impact upon the setting of the AONB.

I did not express any concern during the public consultation stage of the local plan because I did not consider their development would be detrimental to the setting of the AONB. That judgement has been reinforced following our discussion and the information Mary tabled showing potential areas of visibility.

The extent of site ERM4a - 164 Bletchingley Road, Merstham excludes an open area to its east that abuts the AONB in Tandridge. This will allow a separation and a buffer between the proposed housing and the AONB on slightly lower ground. I would be concerned if that field were to be included in the housing site as it is open in nature and development would visually be more prominent. The tree belt along the eastern boundary of the allocated site should be retained but some tree surgery work may be necessary as too some additional planting

Site ERM4b - Land south of Bletchingley Road, Merstham is a pleasant rectangular field bordered by new housing to its north and trees along the other boundaries. However, due to the lie of the land, intervening tree belts and distance from the AONB its development would not be visible from the AONB. This would especially be so if development takes place on Site ERM4a between the said site and the AONB.

Site ERM5 - Oakley Farm, off Bletchingley Road, Merstham is the largest of the three. Its eastern boundary actually abuts the AONB in Tandridge where there is a little development and woodland. The woodland and existing development would mean that the proposed development would have little or no impact upon the AONB beyond. The site does not visually relate to the wider AONB landscape to the east. Some planting along the eastern boundary would help mitigate any immediate impact. For these reasons I really do not consider I could substantiate a case that the proposed development would harm the setting of and nature of the neighbouring AONB.”

2.8. Surrey Hills AONB Management Plan 2014-2019 (Surrey Hills Board)

2.8.1. This Management Plan sets out the significance of the AONB and the vision and management approach for this nationally valued landscape. Section 1.6 of the document lists the following features as defining “*the special character of the Surrey Hills*”, noting that they are “*listed in order based on the feedback on the consultation*”:

- Views
- Woodland
- Heathland
- Tranquillity
- Commons
- Chalk grassland
- Country lanes
- Farmland
- Historic buildings
- Parkland

2.8.2. The document also refers to more detailed ‘statements of significance’ provided on the website. These and the overall ‘Statement of Significance’ for the AONB are provided in Appendix 1 to this LVA.

2.8.3. None of RBBC’s proposed SUE’s are located within the AONB; but some are at a distance where potential effects require consideration. For sites ERM1; ERM2/3; ERM4a, ERM4b and ERM5 potential effects on the purposes of designation and special character of the AONB are considered in section 3-7 below.

2.9. Designation Reviews – Surrey Hills AGLV Review (2007) and Surrey Hills AONB Areas of Search and Recommended Additional Areas Map (2013)

2.9.1. The AGLV and AONB designations across the Surrey hills are closely linked. The 2007 AGLV review considered whether the AGLV should be retained, or boundaries reviewed and reached the conclusion that it should be retained ‘as is’ until an AONB review had taken place, given that “*the original AGLV designation relied on outmoded landscape evaluation techniques*”, resulting in “*anomalies and inconsistencies in that there*

appeared to be little variation between the AONB and AGLV and, in some cases, between the AGLV and surrounding undesignated land. Strong links between the AONB and adjacent AGLV in terms of landscape character were also noted.”

- 2.9.2. The AONB boundary review is an ongoing process, with the 2013 report and map reflecting the results of a study commissioned to put forward a proposal for a boundary review to Natural England, although Natural England have yet to commence the formal boundary review process and no programme or date has been set. This builds on the recommendations of the 2007 report.
- 2.9.3. Both studies contain findings about areas of land in respect of whether they may potentially be of sufficient landscape value to be included within a revised AONB designation. Those findings are referred to within this LVA where relevant on a site by site basis in sections 3-13.

2.10. Borough-Wide Landscape and Townscape Character Assessment (June 2008) by Atkins and RBBC

- 2.10.1. This document predates the Surrey Landscape Assessment described at 2.11 below, and is less detailed in respect of landscape character. It is referred to within this document in respect of relevant townscape character considerations for each site, as these are not covered by the Surrey LCA.

2.11. Surrey-Landscape Character Assessment: Reigate and Banstead Borough (2015) by HAD Landscape Consultants

- 2.11.1. This document describes the character of the landscapes within the Borough and provides management guidelines relevant to each. It is referred to in respect of each site within sections 3-14 below.

3.0 ERM1: Land at Hillsbrow, Redhill

3.1. Site Description

3.1.1. The site is a mix of open grassland and woodland (some ancient woodland), located to the east of Redhill and south of the A25. The policy proposes approximately 100 new homes including retirement accommodation.

3.2. Desk Study

Sustainable Urban Extensions: Broad Geographic Locations Technical Report (November 2012)

3.2.1. As noted at section 2.1 above, the site forms part of Area J within this study. The area is noted as not being subject to any landscape designations (either AONB or AGLV), but falling within the suggested 2007 evaluation area for the AONB boundary review. It is identified as having a “*diverse and disturbed*” character with low sensitivity to change. The site’s contribution to Green Belt purposes is noted as being limited by previously developed land and an urban fringe nature which reduces openness and the contribution to settlement separation.

Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report (June 2016)

3.2.2. In Annex 3 of this LVA, the same points are made in respect of landscape value and designations as noted at Stage 1. The site is also noted as having been historically developed with the potential for historic underground workings but returned to a natural state and fronted along the A25 by residential properties, including some Grade II listed buildings.

3.2.3. In terms of character the site is identified as being within the Wooded Greensand Hills (GW12) character area and is noted to steeply slope to the south and east, with a shallower slope down to the A25 to the north. The resulting visibility from the south and north, is illustrated by views from FP80 and 112 in Annex 4 of the document (pages 55 and 57). Retention of the wooded skyline and minimisation of the visibility of development in views are noted as design aims.

- 3.2.4. Allotments, woodland and ancient woodland within the site are noted as constraints which limit the developable area, with the use of buffer zones and positive management being identified as needing to be ‘part of the design’.
- 3.2.5. It is noted that there are no public rights of way within the site, or formal or informal recreational uses.
- 3.2.6. Drawing on the June 2016 Green Belt Review, the site is identified as making a relatively low contribution to the Green Belt, being of ‘Lower importance’ in terms of checking sprawl and its contribution to the setting of historic towns; and of ‘Moderate importance’ in terms of separating settlements and safeguarding the countryside from encroachment.

Development Management Plan (DMP) Regulation 18 Consultation (August 2016)

- 3.2.7. The site is described as follows:

“The main site comprises areas of open grassland located on the brow of the Greensand Ridge, surrounded by belts of dense woodland, some of which is protected ancient woodland. There is further dense woodland and an area of agricultural land to the south of the central area, which slope steeply down towards Philanthropic Road. These areas are considered unsuitable for development and are excluded from the boundary of the potential development site. The existing residential dwellings and allotment site to the north are also excluded.”

- 3.2.8. It is noted that constraints to development include “*high visibility of wooded slopes and paddock to the south of the site within long distance views, particularly from the south*”, and that opportunities include “*scope for development to improve green infrastructure linkages with the surrounding countryside and secure enhanced management of the ancient woodland areas.*”
- 3.2.9. The document also notes that in respect of Green Belt: “*The site has a relatively low overall priority for protection ... In particular, the land parcel is identified as having strong, defensible boundaries meaning that its development would have a relatively limited impact on urban sprawl.*”

- 3.2.10. Required design and mitigation measures identified in the draft policy include:

- *“Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside...*
- *Protection and enhancement of areas of ancient woodland and other areas of significant woodland, including provision of an appropriate buffer zone and long-term management proposals*
- *Design measures to protect and enhance landscape quality, including building heights and massing which ensure the development is not visible in long-range views”*

Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report Boundary Strength Addendum (October 2017)

- 3.2.11. The Addendum report describes the new Green Belt boundaries that would be formed by the development of site ERM1 as being “*STRONG: Strong tree belt (south), road and strong tree belt (north)*”, and identifies no mitigation action as being required.

Development Management Plan Regulation 19 Consultation (January 2018)

- 3.2.12. The boundaries and extent of the site are unaltered from the Regulation 18 consultation document in the pre-submission draft of the DMP. Required design and mitigation measures identified in the policy are the same as the previous draft except that the biodiversity and green infrastructure improvements are also required to reflect the Greensand Ridge landscape character and an addition to the requirement regarding landscape quality, that “*opportunities should be sought to increase tree coverage where possible, particularly where this may help with mitigating any visual impact.*”
- 3.2.13. The supporting ‘explanation’ includes similar points to those made at the Regulation 18 stage within the site description and constraints and opportunities analysis as set out above.
- 3.2.14. The evidence base for this draft of the DMP includes an updated Green Belt Review (October 2017), in which the site scores a rank of 3 rather than 4, although this does not reflect a change to the assessment of the site (just the scoring system) as set out at section 2.5 above.

- 3.2.15. The Sustainability Appraisal (October 2017)-which provides part of the evidence base for the Reg. 19 DMP rates the development of site ERM1 as ‘expected to have a very negative impact’ on achieving the sustainability objective of protecting or enhancing landscape character, on the basis that “*The site is also elevated and near the AGLV, meaning it may have a particularly strong landscape character impact.*”

Site specific representations

- 3.2.16. Representations on behalf of the potential site developer (Representor No. 0136) were made in response to the Reg. 19 DMP. Within these representations comments are made both on RBBC’s Green Belt Review in respect of the site, and on landscape and visual matters.

Landscape and Visual matters

- 3.2.17. The representation (No. 0136) notes the findings of the October 2017 Sustainability Appraisal in respect of landscape character as reported at section 3.2.12 above and reports on the findings of a landscape and visual appraisal of the site undertaken on behalf of the prospective developer. Appendix 4 to the representation contains a response on LVIA matters which refers to a number of photographs and an LVA undertaken in July 2014 which are not included in the representation. The brief report contained within Appendix 4 sets out the conclusions that

“there are no extensive or open views of the proposed development area. The visual assessment has confirmed the previous findings that there would be low levels of visual impact. The resultant impacts on the AONB to the north of the development area and the AGLV to the south and east would be negligible.

The landscape assessment has identified that Byers Wood, which forms the southern and western boundaries to the development area, would form a robust edge to the proposed development and a long term soft edge to the town. Byers Wood would protect the landscape setting of the Greensand Way to the south and the wider setting of South Nutfield. The site being well-contained by the existing woodland structure would not detract from the general character of the wider landscape and not materially affect the character and appearance of the Greensand Hills ridgeline.”

- 3.2.18. These conclusions and the supporting detail provided within the representation are considered in the appraisal at section 3.3 below.

Green Belt Review

3.2.19. In respect of the Green Belt Review, the representation queries both of the ‘Moderate’ scores suggesting that they should be revised to ‘Lower’. These two criteria relate to the degree to which the site contributes to maintaining separation between settlements and to preventing encroachment.

3.2.20. In respect of the criterion regarding separation, all of the sites are scored as ‘Lower’ apart from ERM1 and ERM2/3, and the scoring system is based on distance as the crow flies and the proportion by which the physical gap would be reduced. The representation quotes from PAS guidance as follows:

“Green Belt is frequently said to maintain the separation of small settlements near to towns, but this is not strictly what the purpose says. This will be different for each case. A ‘scale rule’ approach should be avoided. The identity of a settlement is not really determined just by the distance to another settlement; the character of the place and of the land in between must be taken into account. Landscape character assessment is a useful analytical tool for use in undertaking this type of assessment.”

3.2.21. In respect of the criterion regarding encroachment, all of the sites score ‘Moderate’ or ‘Higher’ apart from site ERM3 which is a brownfield site. The scoring system is based on the degree to which the site is affected by built form or other urbanising influences and the boundary strength of the proposed SUE.

3.2.22. These points are considered in the appraisal at section 3.3 below.

Landscape character

3.2.23. The Surrey Landscape Character Assessment (2015) identifies the site as being located within character area GW12 Earlswood to Oxted Wooded Greensand Hills, lying at the western tip of the character area which extends in a narrow band east-west between Redhill and Oxted. The key characteristics of the landscape type are identified as:

- *“Undulating hills based on greensand.*
- *A secluded landscape dominated by woodland, with areas of pasture and open heathland.*

- *Sparsely settled with scattered farmsteads and small cottages along rural lanes.*
- *Incised, sunken, often steep, winding lanes, with exposed roots and sandy soil to roadside banks. Overhanging surrounding tree cover results in a tunnel effect along the lanes.*
- *Peaceful, remote landscape with a high sense of enclosure, yet often with contrasting panoramic views out over lower ground which aid the appreciation of the elevated nature of the Landscape Type and its prominence in the local landscape.*
- *Historic landscape pattern associated with animal husbandry and movement, and woodland management.”*

3.2.24. The more detailed key characteristics for the character area note a slightly greater presence of settlement and roads than is typical of the landscape type.

3.2.25. The assessment also provides extensive recommendations for the protection and enhancement of character. Recommendations which are particularly pertinent to the potential landscape and visual impacts of the proposed SUE are:

- *“Conserve the secluded, largely unsettled landscape.*
- *Conserve the distinctive pattern and character of existing settlements...*
- *Conserve the rural roads and sunken lanes minimising ... improvements to the road network which would change their character ...*
- *Ensure infill development is sensitive to tree lined sunken lane boundaries and conserves and protects the distinct character of the area.*
- *Conserve and protect the distinct relationship and character between historic cores of towns and villages and the surrounding countryside.*
- *Conserve areas of undisturbed wooded skyline.”*

3.2.26. The Borough-Wide Landscape and Townscape Character Assessment (2008) identifies the urban area adjacent to the site as being ‘1930-50’s Suburbia’ and the A25 to the north of the site as a ‘key gateway’ where it enters the town.

Landscape value

3.2.27. As shown on Figure 6569_ERM1, the site lies outside of both the AONB and AGLV designations. It is also outside of both the ‘Recommended Additional Areas of Surrey Hills AONB’ and the ‘Secondary Potential Additional Areas of Surrey Hills AONB’

identified by the 2013 AONB Boundary review study; although an area partly coinciding with the AGLV 0.3km to the east of the proposed SUE is identified as a recommended additional area.

- 3.2.28. The AONB as currently designated lies 2km to the north beyond Redhill and the nearest area coincides with the Gatton Park Registered Park and Garden.

ZTV Study

- 3.2.29. Figure 6569_ERM1 in Appendix 2 shows a ZTV study for the proposed SUE, based on a building height of 8.5m and including areas of settlement and woodland in the modelling. Visibility is likely to be slightly less extensive than indicated – particularly in Redhill, where the screening effects of garden vegetation and street trees is not allowed for; and in areas where there are substantive hedgerows or tree lines (for example in the areas 1-2km south and southeast of the site).
- 3.2.30. The ZTV study indicates that development on the site would potentially be seen fairly extensively from the more open, lower-lying landscape to the south and southeast, although this will be less than shown due to the substantial field boundaries as discussed above. Relatively extensive areas of visibility are also indicated to the north east, although views from this direction would be seen in the context of the landfill site and potential development within the proposed SUE ERM2/3. Views from other directions will be more fragmented and would be very limited from the south west and west.
- 3.2.31. Visibility from within the AGLV is indicated in particular from areas west of South Nutfield. Some visibility is also indicated from the AONB and Gatton Park – a small area at a distance of 2.1km to the north of Redhill, and patchy visibility at distances of 2.6km or more to the northeast.

3.3. Site observations and appraisal

- 3.3.1. Site work indicates that visibility would be notably less than indicated by the ZTV study and that with careful siting and control of ridge heights, development would be substantially screened by the existing woodland.

- 3.3.2. The topography, woodland and character of the site create containment which would limit the potential for notable effects on landscape character and prevent the perception of coalescence – especially if woodland is retained along the A25 and particularly towards the eastern part of the site, such that road users retain the sense that they are leaving the urban area as they drive past the site.
- 3.3.3. In views from the AONB, any development within the site would be seen at a distance of 2km or more and set beyond more nearby development and beyond the retained woodland which lines the A25 boundary within the site. In this context, development is likely to be seen at most as glimpsed roofs set amongst trees in a slightly more elevated position above the existing townscape. Effects on the special qualities of the AONB are likely to be negligible.
- 3.3.4. Sunken lanes, and hedges and trees alongside roads and forming field boundaries limit views towards the site from the AGLV in and around South Nutfield. Effects on the AGLV are likely to be negligible.

3.4. Conclusion

- 3.4.1. The appraisal above corroborates the findings of the various supporting studies which led to the identification of the site as a SUE. The policy requirement to ensure that heights and massing are designed to limit visibility are important measures to be carried through to both the consenting process and subsequent detailed matters or modifications – as these requirements mitigate against the potential for adverse impacts. Likewise, the requirement to protect and enhance Ancient Woodland is an important requirement and Natural England’s comment that their standing advice should be followed in respect of this would mean best practice is followed in terms of ensuring that adequate protection is secured through the consenting and development process.

4.0 ERM2/3: Land west of Copyhold Works and Former Copyhold Works

4.1. Site Description

4.1.1. The site includes an open paddock and the derelict former Copyhold works. The policy proposes approximately 210 new homes including retirement accommodation.

4.2. Desk Study

Sustainable Urban Extensions: Broad Geographic Locations Technical Report (November 2012)

4.2.1. As noted at section 2.1 above, the site forms part of Area J within this study. The area is noted as not being subject to any landscape designations (either AONB or AGLV) but falling within the evaluation area for the AONB boundary review. It is identified as having a “*diverse and disturbed*” character with low sensitivity to change. The contribution to Green Belt purposes is noted as being limited by previously developed land and an urban fringe nature which reduces openness and the contribution to settlement separation.

Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report (June 2016)

4.2.2. This Technical Report deals with ERM2 and ERM3 as separate sites. In Annex 3 of the report, the same points are made in respect of landscape value and designations as noted at Stage 1. The former Copyhold site is also noted as an industrial site, with both areas identified as potentially having historic underground workings and being fronted along the A25 by residential properties.

4.2.3. In terms of character the site is identified as being within the Urban Edge (UE9) character area and is noted as sloping northwards from the A25, resulting in visibility from north, which is illustrated by views from FP92 in Annex 4 of the document (page 56). Retention of the wooded skyline and minimisation of the visibility of development in views are noted as design aims.

- 4.2.4. It is noted that a public footpath (which is also partly a national cycle route) runs along the western boundary and through the northwest corner of the site.
- 4.2.5. Drawing on the June 2016 Green Belt Review, the site is identified as making a relatively low contribution to Green Belt purposes. The mix of scores is as follows:

Criterion	ERM2	ERM3
Checking sprawl	Lower	Moderate
Settlement separation	Lower	Moderate
Safeguarding countryside	Moderate	Lower
Setting of historic towns	Lower	Lower

Development Management Plan (DMP) Regulation 18 Consultation (August 2016)

- 4.2.6. The site is described as follows:

“The site comprises an open paddock which slopes downwards towards its northern boundary. It is believed that the paddock may have been historically quarried and subsequently restored. In the west of the site is a dense belt of woodland and an existing public right of way leading into the town.

The site adjoins the active Patteson Court landfill, albeit the land which immediately adjoins the site has been filled and restored...”

“The former Copyhold work ... comprises a previously developed former industrial site, comprising a number of derelict buildings and associated areas of hardstanding. Parts of the site have historically been quarried. The site is largely enveloped by belts of dense woodland.”

- 4.2.7. It is noted that constraints to development include “some visibility within long distance views, particularly from the south”, and that opportunities include “scope for development to improve green infrastructure linkages with the surrounding countryside and enhance the biodiversity value...”

4.2.8. The document also notes that for both ERM2 and ERM3: “*the land parcel is identified as having strong, defensible boundaries*”.

4.2.9. Required design and mitigation measures identified in the draft policies include:

- “*Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside...*”
- *Protection and enhancement of areas of significant woodland*
- *Design measures to protect and enhance landscape quality, including building heights/ massing and retention of open areas in visually sensitive locations, to minimise the visibility of development in long-range views*
- *Appropriate buffer zone to the adjoining landfill and mitigation measures to safeguard residential amenity*
- *Design measures to protect the setting of adjoining listed buildings and respect the character of Nutfield Road*
- *Layout to incorporate a buffer zone and improvements to the Redhill Brook corridor*”

Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report Boundary Strength Addendum (October 2017)

4.2.10. The Addendum report describes the new Green Belt boundaries that would be formed by the development of site ERM1 as being “*STRONG: Strong tree belt and landfill bund (north and east), road and strong tree belt (south)*”, and identifies no mitigation action as being required.

Development Management Plan Regulation 19 Consultation (January 2018)

4.2.11. The boundaries and extent of the site now include both ERM2 and ERM3. Required design and mitigation measures identified in the policy are the same as the previous draft except that the biodiversity and green infrastructure improvements are also required to reflect the Greensand Ridge landscape character.

4.2.12. The supporting ‘explanation’ includes similar points to those made at the Regulation 18 stage within the site description and constraints and opportunities analysis as set out above, although it is also noted that the wooded backdrop and borrowed landscape, vistas and views of the Gatton Park RPG require protection.

- 4.2.13. The evidence base for this draft of the DMP includes an updated Green Belt Review (October 2017), in which the sites score ranks of 3 and 4 rather than 4 and 5, although this does not reflect a change to the assessment of the site (just the scoring system) as set out at section 2.5 above.
- 4.2.14. The Sustainability Appraisal (October 2017)-which provides part of the evidence base for the Reg. 19 DMP rates the development of site ERM2 as ‘expected to have a neutral impact’ on achieving the sustainability objective of protecting or enhancing landscape character, on the basis that “*The site is near the AGLV, but well separated from it by the landfill.*” ERM3 is rated as ‘expected to have a negative impact’ on the basis that “*The site is also elevated and near the AGLV, meaning it may have a particularly strong landscape character impact*”.

Site specific representations

- 4.2.15. Representations on behalf of the potential site developer (Representor No. 0139) were made in response to the Reg. 19 DMP. Within these representations comments are made both on the Green Belt Review in respect of the site, and on landscape and visual matters.

Landscape and Visual matters

- 4.2.16. The representation (No. 0139) includes a site appraisal which notes that “*the site is reflective of the varied landscape character set out in published assessments... although planting of coniferous screening trees and areas of plantation exacerbate the sense of an uncharacteristic landscape structure*”. It is also noted that the site is “subject to a range of urbanising/industrial influences”.
- 4.2.17. In terms of visibility the appraisal notes that “*There is very limited visibility of the Site from the west, south and east, owing to topography, including the elevated landform of the landfill site to the east and the Greensand ridgeline to the south; vegetation, notably the woodland associated with the Greensand ridgeline and the treebelts that border the Site, particularly to the north and west; and built form within the urban area. ... More open views towards the Site are therefore restricted to a cone to the north.*”

4.2.18. These conclusions and the supporting detail provided within the representation are considered in the appraisal at section 4.3 below.

Green Belt

4.2.19. In respect of the Green Belt, the appraisal notes that “*the eastern part of the Site comprises derelict, previously developed land*” and suggests that development would not contribute to sprawl in part due to this factor, and as a result of the strong boundaries. The representation notes that development would not contribute to coalescence as there are no settlements to the east of the site, but also notes that “*the A25 corridor to the south already includes built development extending east of the site*”, effectively including dispersed settlement along the A25 as being part of the urban area of Redhill.

4.2.20. In respect of encroachment on the countryside, the representation accepts that development within the western part of the site would represent encroachment, but also makes the point that demolition of the larger existing structures in the former copyhold works may reduce visual intrusion. The representation also sets out the conclusion, shared by the Green Belt Reviews, that development of the site would have no effect on the setting of historic towns.

4.2.21. These points are considered in the appraisal at section 4.3 below.

Landscape character

4.2.22. The Surrey Landscape Character Assessment (2015) identifies the site as being located within character area UE9 Holmthorpe Pits and Mercer’s Park, lying at the southwestern corner of the character area which extends eastwards from Redhill to the M23. The key characteristics of the landscape type are identified as:

- “*Unique areas, with a variety of characteristic and uses, which do not readily fall within the broader character types set out in the preceding sections of this document.*
- *On the edges of towns, often entirely enclosed by Built Up Areas, the majority of these areas have significant human intervention, and frequently provide outdoor amenity for the surrounding population.*

- *Although often enclosed by urban areas, they maintain physical and visual connections to the wider landscape.*
- *Provide landscape setting to adjacent urban areas and settlements.*
- *These areas are also characterised by having high biodiversity value and potential, close to built up areas.”*

4.2.23. The more detailed key characteristics for the character area note that it is part of the wider Greensand Valley and characterised by sand quarrying sites in varying stages of restoration including lakes.

4.2.24. The assessment also provides recommendations for the protection and enhancement of character. Recommendations which are particularly pertinent to the potential landscape and visual impacts of the proposed SUE are:

- *“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.*
- *Conserve the historic elements of the landscape as remnants of an older landscape.”*

4.2.25. The Borough-Wide Landscape and Townscape Character Assessment (2008) identifies the urban area adjacent to the site as being ‘1930-50’s Suburbia’ and the A25 to the south of the site as a ‘key gateway’ where it enters the town.

Landscape value

4.2.26. As shown on Figure 6569_ERM2/3, the site lies outside of both the AONB and AGLV designations. It is also outside of both the ‘Recommended Additional Areas of Surrey Hills AONB’ and the ‘Secondary Potential Additional Areas of Surrey Hills AONB’ identified by the 2013 AONB Boundary review study; although an area partly coinciding with the AGLV 0.3km to the east of the proposed SUE is identified as a recommended additional area.

4.2.27. The AONB as currently designated lies 1.5km to the north beyond Redhill and the nearest area coincides with the Gatton Park Registered Park and Garden.

ZTV Study

- 4.2.28. Figure 6569_ERM2/3 shows a ZTV study for the proposed SUE, based on a building height of 8.5m and including areas of settlement and woodland in the modelling. Visibility is likely to be slightly less extensive than indicated – particularly in Redhill, where the screening effects of garden vegetation and street trees is not allowed for; and in areas where there are substantive hedgerows or tree lines (for example in the areas 1-2km south and southeast of the site).
- 4.2.29. The ZTV study indicates that development on the site would potentially be seen fairly extensively from the more open, lower-lying landscape to the south and southeast, although this will be less than shown due to the substantial field boundaries as discussed above and views from this direction would potentially be seen in the context of more nearby development within ERM1. Relatively extensive areas of visibility are also indicated to the north east, although views from this direction would be seen in the context of the landfill site. Views from other directions will be more fragmented and would be very limited from the south west and west.
- 4.2.30. Some visibility from within the AGLV is indicated from areas west and northeast of South Nutfield. Some visibility is also indicated from the AONB and Gatton Park – a small area at a distance of 1.7km to the north of Redhill, and patchy visibility from the AONB at distances of 2.3km or more to the northeast.

4.3. Site observations and appraisal

- 4.3.1. Site work indicates that visibility would be notably less than indicated by the ZTV study and that with careful siting and control of ridge heights on the upper parts of the site close to the A25, visibility from the south east, including the AGLV, would be very limited. Careful consideration of heights and massing at this higher part of the site would also help the aim of retaining the wooded backdrop in views from Gatton Park and the AONB.
- 4.3.2. The topography, woodland and character of the site create containment which would limit the potential for notable effects on landscape character and prevent the

perception of coalescence – especially if woodland is retained along the A25 and particularly towards the south and eastern parts of the site, such that road users retain the sense that they are leaving the urban area as they drive past the site. The site has a strong visual relationship with the town to the north – with views out across the urban area from the higher ground within the site. There are also views from residential areas to the north in which the site forms a wooded skyline and the consideration of heights and massing, and retention of trees in the upper part of the site would be of benefit in maintaining the skyline.

- 4.3.3. In views from the AONB, any development within the site would be seen at a distance of 2km or more and set beyond more nearby development and beyond the retained woodland which lines the A25 boundary within the site. In this context, it is likely to be seen as occupying a slightly more elevated position and continuing the existing townscape. Effects on the special qualities of the AONB are likely to be negligible.
- 4.3.4. Sunken lanes, and hedges and trees alongside roads and forming field boundaries limit views towards the site from the AGLV in and around South Nutfield. Effects on the AGLV are likely to be negligible.

4.4. Conclusion

- 4.4.1. The appraisal above corroborates the findings of the various supporting studies which led to the identification of the site as an SUE. The policy requirements to ensure that heights and massing avoid visually sensitive areas, and to protect the character of Nutfield Road are important measures to be carried through to both the consenting process and subsequent detailed matters or modifications – as these requirements mitigate against the potential for adverse impacts.

5.0 ERM4a: 164 Bletchingley Road, Merstham

5.1. Site Description

5.1.1. The site is formed of a residential dwelling set within a large plot including paddocks containing a number of small farm buildings. The site lies at the eastern edge of Merstham, to the south of Bletchingley Road. The policy proposes approximately 30 new homes.

5.2. Desk Study

Sustainable Urban Extensions: Broad Geographic Locations Technical Report (November 2012)

5.2.1. As noted at section 2.1 above, the site forms part of Area K within this study. The area is noted as being close to the AONB, with part of the search area being within the AGLV. It is identified as having a “*diverse and disturbed*” character with low sensitivity to change due to the influence of urban areas and transport corridors. In respect of contribution to Green Belt purposes, the farm buildings within the site are noted as being previously developed land, and the area is noted as having low or no sensitivity with regards to preventing coalescence or sprawl.

Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report (June 2016)

5.2.2. In Annex 3 of the Technical Report, ERM4a is included as part of site ERM4, along with ERM4b and a field further to the east which was omitted from the SUE at the Regulation 18 stage (the wider area is shown in the June 2016 Green Belt Study). It is noted that none of the land parcel lies within the AONB or AGLV.

5.2.3. In terms of character the site is identified as being within the Urban Edge (UE9) character area and is noted as being within a landscape altered by human actions including quarrying. Enhancing the landscape setting of settlements, retaining historic field patterns and maintaining physical and visual links to the wider landscape are noted as key design aims.

5.2.4. It is noted that a bridleway runs through the land parcel (ERM4), although this divides 4a/4b and lies to the west of ERM4a, continuing around to the south. A

public right of way is also referred to as running along the eastern boundary, although this refers to the field to the east of the final SUE.

- 5.2.5. Drawing on the June 2016 Green Belt Review, the site is identified as making a relatively low contribution to the Green Belt, being of ‘Lower importance’ in all criteria except for being of ‘Moderate importance’ in terms of safeguarding the countryside from encroachment and checking sprawl – although this finding relates to the wider area as discussed above.

Development Management Plan (DMP) Regulation 18 Consultation (August 2016)

- 5.2.6. The land parcel ERM4, which at this stage encompassed both ERM4a and ERM4b, is described as follows:

“The site comprises an area of amenity/open space to the south of the former Darby House site alongside a residential dwelling set within a substantial plot containing a series of small scale redundant farm buildings. The two sites are separated by an existing, tree-lined public right of way.

To the south and east, the site adjoins the wetland nature reserve of Spynes Mere. The site of Woodlands School, a special school, adjoins to the west.”

- 5.2.7. It is noted that constraints to development include *“some visibility within long distance views”*, and that opportunities include *“scope for development to improve green infrastructure linkages with the surrounding countryside and enhance rights of way.”*
- 5.2.8. The document also reprises the findings of the Green Belt Study discussed at 5.2.5 above, specifically noting that *“development of the eastern portion (excluded from the potential site boundary) would represent a degree of encroachment into the countryside”*.
- 5.2.9. Required design and mitigation measures identified in the draft policy include:
- *“Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside, and an appropriate relationship with the adjoining nature reserve ...*
 - *Protection and enhancement of woodland boundaries*

- *Design and layout to enhance landscape quality, provide an appropriate transition to surrounding countryside and minimise visibility of the development in long range views*
- *Protection and enhancement of the character and setting of existing listed buildings*
- *Design to respect and enhance the character of Bletchingley Road.”*

**Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report
Boundary Strength Addendum (October 2017)**

- 5.2.10. The Addendum report describes the new Green Belt boundaries that would be formed by the development of site ERM4a as being “*MODERATE: intermittent tree belt and poorly marked curtilages (east), steep bank and tree belt (south), road and dense hedgerow (north); strong tree belt (west)*”. The document also notes that “*A more logical boundary is to be found further to the east, at the boundary line of the borough, where there is a stronger belt of trees. However, this land is in a different ownership from the site proposed as an SUE, and is considered unsuitable for addition to the SUE allocation. Consequently, while not ideal, the current boundary is considered appropriate in terms of not removing an undue amount of land from the Green Belt, and not removing inappropriate land from the Green Belt.*”.
- 5.2.11. Potential mitigation actions to reinforce the boundaries are identified as “*Additional tree or hedgerow planting along the eastern boundary; consideration of existing trees for TPOs.*”

Development Management Plan Regulation 19 Consultation (January 2018)

- 5.2.12. The site is now clearly identified as ERM4a. Required design and mitigation measures identified in the policy are the same as the previous draft except for a reference to the requirement for tree or hedgerow planting along the eastern boundary – drawing on the Green Belt Boundary Strength report as noted above.
- 5.2.13. The supporting ‘explanation’ includes similar points to those made at the Regulation 18 stage within the site description and constraints and opportunities analysis as set out above.

- 5.2.14. The evidence base for this draft of the DMP includes an updated Green Belt Review (October 2017), in which the site scores a rank of 3 rather than 4, although this does not reflect a change to the assessment of the site (just the scoring system) as set out at section 2.5 above. It is more notable that this later Green Belt study was not updated to reflect the removal of the eastern area or the split into 4a/4b. This would not alter the considerations in respect of the criterion relating to checking sprawl, as the strength of the revised boundaries was assessed as Moderate rather than Strong, and so the criterion regarding sprawl would continue to be judged as Moderate. However, the continued inclusion of the field to the east may mean that the rating of ‘Moderate’ in respect of safeguarding from encroachment, could potentially be lower than for ERM4a alone given that it was the eastern part of the land parcel that was noted as being problematic in this respect as discussed at 5.2.8 above.
- 5.2.15. The Sustainability Appraisal (October 2017)-which provides part of the evidence base for the Reg. 19 DMP rates the development of site ERM4 as ‘expected to have a negative impact’ on achieving the sustainability objective of protecting or enhancing landscape character, on the basis that *“The site is in an area with long range views possible, and may have an impact on landscape character.”*

Site specific representations

- 5.2.16. No site specific representations have been made available for review.

Landscape character

- 5.2.17. The Surrey Landscape Character Assessment (2015) identifies the site as being located within character area UE9 Holmthorpe Pits and Mercer’s Park, lying along the northern boundary of the character area which extends eastwards from Redhill to the M23. The key characteristics of the landscape type are identified as:
- *“Unique areas, with a variety of characteristic and uses, which do not readily fall within the broader character types set out in the preceding sections of this document.*
 - *On the edges of towns, often entirely enclosed by Built Up Areas, the majority of these areas have significant human intervention, and frequently provide outdoor amenity for the surrounding population.*

- *Although often enclosed by urban areas, they maintain physical and visual connections to the wider landscape.*
- *Provide landscape setting to adjacent urban areas and settlements.*
- *These areas are also characterised by having high biodiversity value and potential, close to built up areas.”*

5.2.18. The more detailed key characteristics for the character area note that it is part of the wider Greensand Valley and characterised by sand quarrying sites in varying stages of restoration including lakes.

5.2.19. The assessment also provides recommendations for the protection and enhancement of character. Recommendations which are particularly pertinent to the potential landscape and visual impacts of the proposed SUE are:

- *“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.*
- *Conserve the historic elements of the landscape as remnants of an older landscape.”*

5.2.20. The Borough-Wide Landscape and Townscape Character Assessment (2008) identifies the urban area adjacent to the site as being ‘1960-70’s Modern Estates’ and Bletchingley Road to the north of the site as a ‘key gateway’ where it enters the town.

Landscape value

5.2.21. As shown on Figure 6569_ERM4a, the site lies outside of both the AONB and AGLV designations, separated by a field from the AONB and AGLV which extend across the motorway from the east, but lie primarily to the north. Gatton Park registered park and Garden lies beyond the adjoining townscape, approximately 1.7km to the west.

ZTV Study

5.2.22. Figure 6569_ERM4a shows a ZTV study for the proposed SUE, based on a building height of 8.5m and including areas of settlement and woodland in the modelling. Visibility is likely to be slightly less extensive than indicated – particularly in Merstham, where the screening effects of garden vegetation and street trees is not

allowed for, and in areas where there are substantive hedgerows or tree lines (for example in the areas 1-2km southeast of the site).

- 5.2.23. The ZTV study indicates that development on the site would potentially be seen fairly extensively from the more open, lower-lying area to the south and southeast, which is a much modified landscape including lakes and a landfill site within former quarry workings. Relatively extensive areas of visibility are also indicated from the area within the AONB to the east, at distances of 0.7km or more; and from south facing slopes which lie within the AONB to the north beyond the M25 at distances of approximately 1.3-1.7km – although potentially these views would be seen in the context of more nearby development within ERM5. A smaller area of visibility is shown from the area of AONB and Gatton Park to the west of Merstham, at distances of 1.8km and more.

5.3. Site observations and appraisal

- 5.3.1. Site work indicates that visibility would be notably less than indicated by the ZTV study – in particular as the tree-lined boundaries around the site and along the western boundary of the adjacent field to the east are not included within the modelling and provide notable screening (in summer).
- 5.3.2. The routes and vegetation around the east and south sides of the site provide containment which would limit the potential for notable effects on landscape character and prevent the perception of coalescence. Approaching Merstham from the east, the stretch of Bletchingley Road which passes the site already has the character of settlement edge – with an increasing frequency of buildings seen set amongst or beyond mature hedges and trees.
- 5.3.3. In views from the AONB, any development within the site would be seen at a distance as roofs set amongst trees. In practice outward views towards the site from the AONB to the west and east are considerably more limited by localised vegetation than the ZTV Study indicates. The footpaths ascending open slopes of the AONB to the north would have some visibility of development within the site, and in this context the site would form part of a pattern of built form amongst trees and the

motorway corridors would continue to be the more eye-catching and detrimental feature in the views. Effects on the special qualities of the AONB are likely to be negligible.

- 5.3.4. Sunken lanes, and hedges and trees alongside roads and forming field boundaries limit views towards the site from the AGLV in and around South Nutfield. Effects on the AGLV are likely to be negligible.

5.4. Conclusion

- 5.4.1. The appraisal above corroborates the findings of the various supporting studies which led to the identification of the site as an SUE. The policy requirements to minimise visibility of development, and to protect the character of Bletchingley Road are important measures to be carried through to both the consenting process and subsequent detailed matters or modifications – as these requirements mitigate against the potential for adverse impacts.

6.0 ERM4b: Land west of Bletchingley Road, Merstham

6.1. Site Description

6.1.1. The site is formed of an area of open space to the south of a recent development of residential properties. The site lies at the eastern edge of Merstham, to the south of Bletchingley Road. The policy proposes approximately 20 new homes.

6.2. Desk Study

Sustainable Urban Extensions: Broad Geographic Locations Technical Report (November 2012)

6.2.1. As noted at section 2.1 above, the site forms part of Area K within this study. The area is noted as being close to the AONB, with part of the search area being within the AGLV. It is identified as having a “*diverse and disturbed*” character with low sensitivity to change due to the influence of urban areas and transport corridors. In respect of contribution to Green Belt purposes, the farm buildings within the site are noted as being previously developed land, and the area is noted as having low or no sensitivity with regards to preventing coalescence or sprawl.

Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report (June 2016)

6.2.2. In Annex 3 of the Technical Report, ERM4b is included as part of site ERM4, along with ERM4a and a field further to the east which was omitted from the SUE at the Regulation 18 stage (the wider area is shown in the June 2016 Green Belt Study). It is noted that none of the land parcel lies within the AONB or AGLV.

6.2.3. In terms of character, the site is identified as being within the Urban Edge (UE9) character area and is noted as being within a landscape altered by human actions including quarrying. Enhancing the landscape setting of settlements, retaining historic field patterns and maintaining physical and visual links to the wider landscape are noted as key design aims.

6.2.4. It is noted that a bridleway runs through the land parcel (ERM4), although this divides 4a/4b and lies to the east of ERM4b, continuing eastwards from the southern

boundary. A public right of way is also referred to as running along the eastern boundary, although this refers to the field to the east of ERM4a.

- 6.2.5. Drawing on the June 2016 Green Belt Review, the site is identified as making a relatively low contribution to the Green Belt, being of ‘Lower importance’ in all criteria except for being of ‘Moderate importance’ in terms of safeguarding the countryside from encroachment and checking sprawl – although this finding relates to the wider area as discussed above.

Development Management Plan (DMP) Regulation 18 Consultation (August 2016)

- 6.2.6. The land parcel ERM4, which at this stage encompassed both ERM4a and ERM4b, is described as follows:

“The site comprises an area of amenity/open space to the south of the former Darby House site alongside a residential dwelling set within a substantial plot containing a series of small scale redundant farm buildings. The two sites are separated by an existing, tree-lined public right of way.

To the south and east, the site adjoins the wetland nature reserve of Spynes Mere. The site of Woodlands School, a special school, adjoins to the west.”

It is noted that constraints to development include “some visibility within long distance views”, and that opportunities include “scope for development to improve green infrastructure linkages with the surrounding countryside and enhance rights of way.”

- 6.2.7. The document also reprises the findings of the Green Belt Study discussed at 6.2.2 above, specifically noting that *“development of the eastern portion (excluded from the potential site boundary) would represent a degree of encroachment into the countryside”*.

- 6.2.8. Required design and mitigation measures identified in the draft policy include:

- *“Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside, and an appropriate relationship with the adjoining nature reserve ...*
- *Protection and enhancement of woodland boundaries*
- *Design and layout to enhance landscape quality, provide an appropriate transition to surrounding countryside and minimise visibility of the development in long range views*

- *Protection and enhancement of the character and setting of existing listed buildings*
- *Design to respect and enhance the character of Bletchingley Road.”*

**Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report
Boundary Strength Addendum (October 2017)**

- 6.2.9. The Addendum report describes the new Green Belt boundaries that would be formed by the development of site ERM4b as being “*MODERATE: hedgerow of varying density (west); steep bank and tree belt (south), road and dense hedgerow (north); strong tree belt (east)*”.
- 6.2.10. Potential mitigation actions to reinforce the boundaries are identified as “*Additional tree or hedgerow planting along the western boundary; consideration of existing trees for TPOs.*”

Development Management Plan Regulation 19 Consultation (January 2018)

- 6.2.11. The site is now clearly identified as ERM4b. Required design and mitigation measures identified in the policy are the same as the previous draft except for a reference to the requirement for tree or hedgerow planting along the western boundary – drawing on the Green Belt Boundary Strength report as noted above.
- 6.2.12. The supporting ‘explanation’ includes similar points to those made at the Regulation 18 stage within the site description and constraints and opportunities analysis as set out above.
- 6.2.13. The evidence base for this draft of the DMP includes an updated Green Belt Review (October 2017), in which the site scores a rank of 3 rather than 4, although this does not reflect a change to the assessment of the site (just the scoring system) as set out at section 2.5 above. It is more notable that this later Green Belt study was not updated to reflect the removal of the eastern area or the split into 4a/4b. This would not alter the considerations in respect of the criterion relating to checking sprawl, as the strength of the revised boundaries was assessed as Moderate rather than Strong, and so the criterion regarding sprawl would continue to be judged as Moderate. However, the continued inclusion of the field to the east of ERM4a may mean that the score of ‘Moderate’ in respect of safeguarding from encroachment, could

potentially be higher than for ERM4b given that it was the eastern part of the land parcel that was noted as being problematic in this respect as discussed at 6.2.3 above.

- 6.2.14. The Sustainability Appraisal (October 2017)-which provides part of the evidence base for the Reg. 19 DMP rates the development of site ERM4 as ‘expected to have a negative impact’ on achieving the sustainability objective of protecting or enhancing landscape character, on the basis that *“The site is in an area with long range views possible, and may have an impact on landscape character.”*

Site specific representations

- 6.2.15. No site specific representations have been made available for review.

Landscape character

- 6.2.16. The Surrey Landscape Character Assessment (2015) identifies the site as being located within character area UE9 Holmthorpe Pits and Mercer’s Park, lying along the northern boundary of the character area which extends eastwards from Redhill to the M23. The key characteristics of the landscape type are identified as:
- *“Unique areas, with a variety of characteristic and uses, which do not readily fall within the broader character types set out in the preceding sections of this document.*
 - *On the edges of towns, often entirely enclosed by Built Up Areas, the majority of these areas have significant human intervention, and frequently provide outdoor amenity for the surrounding population.*
 - *Although often enclosed by urban areas, they maintain physical and visual connections to the wider landscape.*
 - *Provide landscape setting to adjacent urban areas and settlements.*
 - *These areas are also characterised by having high biodiversity value and potential, close to built up areas.”*
- 6.2.17. The more detailed key characteristics for the character area note that it is part of the wider Greensand Valley and characterised by sand quarrying sites in varying stages of restoration including lakes.

6.2.18. The assessment also provides recommendations for the protection and enhancement of character. Recommendations which are particularly pertinent to the potential landscape and visual impacts of the proposed SUE are:

- *“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.*
- *Conserve the historic elements of the landscape as remnants of an older landscape.”*

6.2.19. The Borough-Wide Landscape and Townscape Character Assessment (2008) identifies the urban area adjacent to the site as being ‘1960-70’s Modern Estates’ and Bletchingley Road to the north of the site as a ‘key gateway’ where it enters the town.

Landscape value

6.2.20. As shown on Figure 6569_ERM4b, the site lies outside of both the AONB and AGLV designations, separated by two fields from the AONB and AGLV which extend across the motorway from the east, but lie primarily to the north.

ZTV Study

6.2.21. Figure 6569_ERM4a shows a ZTV study for the proposed SUE, based on a building height of 8.5m and including areas of settlement and woodland in the modelling. Visibility is likely to be slightly less extensive than indicated – particularly in Merstham, where the screening effects of garden vegetation and street trees is not allowed for, and in areas where there are substantive hedgerows or tree lines (for example in the areas 1-2km southeast of the site).

6.2.22. The ZTV study indicates that development on the site would potentially be seen fairly extensively from the more open, lower-lying area to the south and southeast, which is a much modified landscape including lakes and a landfill site within former quarry workings. Relatively extensive areas of visibility are also indicated from the area within the AONB to the east, mostly at distances of 1km or more although potentially these views would be seen in the context of more nearby development within site ERM4a; and from south facing slopes which lie within the

AONB to the north beyond the M25 at distances of approximately 1.5km or more, although potentially these views would be seen in the context of more nearby development within site ERM5. A smaller area of visibility is shown from the area of AONB and Gatton Park to the west of Merstham, at distances of 1.7km and more.

6.3. Site observations and appraisal

- 6.3.1. Site work indicates that visibility would be notably less than indicated by the ZTV study – in particular as the tree-lined boundaries around the site and along the boundaries of the adjacent fields to the east, and recently built housing to the north are not included within the modelling and provide notable screening.
- 6.3.2. The routes and vegetation around the site provide containment, and the small scale nature of the development would limit the potential for notable effects on landscape character and prevent the perception of coalescence. Approaching Merstham from the east, the stretch of Bletchingley Road which passes the site already has the character of settlement edge – with an increasing frequency of buildings seen set amongst or beyond mature hedges and trees.
- 6.3.3. In views from the AONB, any development within the site would be seen at a distance as roofs set amongst trees. In practice outward views towards the site from the AONB to the west and east are considerably more limited by localised vegetation than the ZTV Study indicates. The footpaths ascending open slopes of the AONB to the north may have some visibility of development within the site, and in this context the site would be seen beyond existing housing as part of a pattern of built form amongst trees and the motorway corridors would continue to be the more eye-catching and detrimental feature in the views. Effects on the special qualities of the AONB are likely to be negligible.
- 6.3.4. Sunken lanes, and hedges and trees alongside roads and forming field boundaries limit views towards the site from the AGLV in and around South Nutfield. Effects on the AGLV are likely to be negligible.

6.4. Conclusion

- 6.4.1. The appraisal above corroborates the findings of the various supporting studies which led to the identification of the site as an SUE. The policy requirements to minimise visibility of development, and to protect the character of Bletchingley Road are useful measures to be carried through to both the consenting process and subsequent detailed matters or modifications – as these requirements mitigate against the limited potential for adverse impacts.

7.0 ERM5: Oakley Farm, off Bletchingley Road, Merstham

7.1. Site Description

7.1.1. The site is formed of an area of pasture, with a mix of vegetation including field trees, hedgerows, and lines of trees marking former field boundaries. A major road junction (M23/M25) lies to the northeast, and Merstham lies to the west. The policy proposes approximately 95 new homes.

7.2. Desk Study

Sustainable Urban Extensions: Broad Geographic Locations Technical Report (November 2012)

7.2.1. As noted at section 2.1 above, the site forms part of Area K within this study. The area is noted as being close to the AONB, with part of the search area being within the AGLV. It is identified as having a “*diverse and disturbed*” character with low sensitivity to change due to the influence of urban areas and transport corridors. In respect of contribution to Green Belt purposes, the farm buildings within the site and adjacent office/school premises are noted as being previously developed land, and the area is noted as having low or no sensitivity with regards to preventing coalescence or sprawl.

Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report (June 2016)

7.2.2. In Annex 3 of the Technical Report, the same points are made in respect of landscape value and designations as noted at Stage 1. It is also noted that part of the land parcel lies within the AONB, although this part of the land parcel was subsequently omitted in later revisions to the proposed SUE. Another area of the land parcel subsequently excluded lies to the northwest edge which was noted as being important to the setting to the Grade II listed Oakley Centre and its gardens.

7.2.3. In terms of character the site is identified as being within the Greensand Valley (GV4) character area and is noted as falling gently from north to south with some views out to the north and the wider countryside. Reflecting the historic field

pattern, retention of the historic farm buildings, and maintaining views out are noted as design aims.

7.2.4. It is noted that there is a public right of way through the site (the Tandridge Border Path).

7.2.5. Drawing on the June 2016 Green Belt Review, the site is identified as making a low contribution to the Green Belt, being of ‘Lower importance’ in all criteria except for being of ‘Moderate importance’ in terms of safeguarding the countryside from encroachment. The parcel is specifically noted as having strong boundaries due to the nearby motorways.

Development Management Plan (DMP) Regulation 18 Consultation (August 2016)

7.2.6. The site is described as follows:

“The site lies between the existing built up area of Merstham and the borough boundary with Tandridge.

The site comprises several open fields used predominantly for grazing, with a small cluster of agricultural buildings in the west, some of which are listed. To the east, the site adjoins further open countryside in the borough of Tandridge. The site is bounded by the M23/M25 to the north east.

The individual residential properties fronting onto Bletchingley Road in private ownership are excluded from the boundary of the potential development site, as are the grounds of the former Oakley Centre.”

7.2.7. It is noted that constraints to development include “*small part of the site is within the Area of Outstanding Natural Beauty and the site has some visibility within long distance views, particularly from the north.*”, and that opportunities include “*scope for development to improve green infrastructure linkages with the surrounding countryside and enhance rights of way.*”

7.2.8. The document also reprises the findings of the Green Belt Study discussed at 7.2.5 above.

7.2.9. Required design and mitigation measures identified in the draft policy include:

- *“Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside*
- *Ensure an appropriate transition to adjoining countryside, particularly by providing a significant area of new green corridor and public open space in the eastern part of the site*
- *Protection and enhancement of woodland, particularly on boundaries*
- *Design and layout to enhance landscape quality, particularly in proximity to the AONB and minimise visibility of the development in long range views ...*
- *Design to respect and enhance the character of Bletchingley Road”*

Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report Boundary Strength Addendum (October 2017)

7.2.10. The Addendum report describes the new Green Belt boundaries that would be formed by the development of site ERM5 as being *“STRONG: dense tree belt and hedgerow, motorway berm (east), road and dense hedgerow (south), dense tree belt and small fenced area (west)”*. The fenced area is described as a 55m section adjoining a recreational open space to the northwest of the site.

7.2.11. Potential mitigation actions to reinforce the boundaries are identified as *“Additional tree or hedgerow planting along the north-eastern boundaries.”*

Development Management Plan Regulation 19 Consultation (January 2018)

7.2.12. The boundaries and extent of the site are reduced from the Regulation 18 consultation document in the pre-submission draft of the DMP and omit the area within the AONB. Required design and mitigation measures identified in the policy are the same as the previous draft except for a reference to the need to protect existing residential amenity, and the requirement for tree or hedgerow planting along the north-eastern boundaries – drawing on the Green Belt Boundary Strength report as noted above.

7.2.13. The supporting ‘explanation’ includes similar points to those made at the Regulation 18 stage within the site description and constraints and opportunities analysis as set out above.

- 7.2.14. The evidence base for this draft of the DMP includes an updated Green Belt Review (October 2017), in which the site scores a rank of 4 rather than 5, although this does not reflect a change to the assessment of the site (just the scoring system) as set out at section 2.5 above.
- 7.2.15. The Sustainability Appraisal (October 2017)-which provides part of the evidence base for the Reg. 19 DMP rates the development of site ERM5 as ‘expected to have a neutral impact’ on achieving the sustainability objective of protecting or enhancing landscape character, on the basis that *“The presence of two large motorways in the area means landscape impact is unlikely to be a great concern.”*

Site specific representations

- 7.2.16. Representations on behalf of the potential site developer (Representor No. 0144) were made in response to the Reg. 19 DMP. Within these representations comments are made both on the Green Belt in respect of the site, and on landscape and visual matters.

Landscape and Visual matters

- 7.2.17. The representation (No. 0144) suggests that up to 145 dwellings may be capable of being accommodated within the site and includes a masterplan to illustrate this point. The masterplan is described as demonstrating *“how the mature landscape features can be retained”* and includes retention of the existing farm buildings. The representation also notes that *“The site lies at the existing urban fringe and is well related to the housing area to the west. It benefits from a mature landscape framework which provides a high degree of containment in views from the surrounding area.”* The representation sets out a conclusion that development in line with their proposed indicative masterplan *“would integrate well with the adjoining settlement of Merstham to the west and would not intrude on the wider landscape setting to the south, or north within the Surrey Hills AONB. In addition, housing in this location would not be intrusive on key views from the surrounding area.”*
- 7.2.18. These conclusions and the limited supporting detail provided within the representation are considered in the appraisal at section 7.4 below.

Green Belt

7.2.19. In respect of the Green Belt, the representation asserts that “*the site could be released from the Green Belt without harming the objectives of the NPPF’s Green Belt Policy*” and makes assertions regarding the ‘five purposes’ but does not provide any detail to support these points.

Landscape character

7.2.20. The Surrey Landscape Character Assessment (2015) identifies the site as being located within character area GV4 Merstham To Clacket Lane Greensand Valley, lying at the western tip of the character area which extends eastwards from Merstham in a narrow band roughly along the M25 corridor. The key characteristics of the landscape type are identified as:

- *“Valley based on greensand with alluvium, diamicton and sand and gravel drift geology.*
- *Moderately flat or gently undulating farmland enclosed by the North Downs scarp to the north and the hills of the greensand ridge to the south.*
- *The area is crisscrossed the headwaters of a number of important river catchments. The Pipp Brook which flows in to the River Mole, the Tillingbourne which flows in to the Wey, and the River Eden. ...*
- *Semi-enclosed area with rural views to the open pastoral valley sides, the North Downs scarp and the wooded slopes of the greensand hills.*
- *Contains east west transport links running parallel with the scarp to the north.*
- *Historic landscape pattern based on mixed farming on the easily cultivated lighter soils between the chalk of the North Downs and the heavier clay soils of the low weald.”*

7.2.21. The more detailed key characteristics for the character area note a slightly greater presence of settlements and quarry workings than is typical of the landscape type.

7.2.22. The assessment also provides extensive recommendations for the protection and enhancement of character. Recommendations which are particularly pertinent to the potential landscape and visual impacts of the proposed SUE are:

- *“... conserve and enhance key landscape features such as the hedgerows and woodlands.*
- *Conserve and enhance the open views up to wooded ridge of chalk ridge to the north and greensand hills to the north and south.*
- *Promote the use of appropriate plant species and boundary treatments at village edges to better integrate development into the adjacent rural character.*
- *Maintain the open character of the valley sides with their sparse settlement of farmsteads.*
- *Improve understanding of the general pattern of settlements and their relationship to the landscape and ensure that new development is sympathetic to the wider pattern of settlement.*
- *Conserve the rural roads and sunken lanes minimising small-scale incremental change such as signage, fencing or improvements to the road network which would change their character.”*

7.2.23. The Borough-Wide Landscape and Townscape Character Assessment (2008) identifies the urban area adjacent to the site as being ‘1960-70’s Modern Estates’ and Bletchingley Road to the south of the site as a ‘key gateway’ where it enters the town.

Landscape value

7.2.24. As shown on Figure 6569_ERM5, the site lies outside of both the AONB and AGLV designations, immediately adjacent to the AONB and AGLV which extend across the motorway from the east but lie primarily to the north. Gatton Park Registered Park and Garden and a further area of the AONB lie beyond Merstham, approximately 1.7km to the west.

ZTV Study

7.2.25. Figure 6569_ERM5 shows a ZTV study for the proposed SUE, based on a building height of 8.5m and including areas of settlement and woodland in the modelling. Visibility is likely to be slightly less extensive than indicated – particularly in Merstham, where the screening effects of garden vegetation and street trees is not allowed for, and in areas where there are substantive hedgerows or tree lines (for example in the areas 1-2km southeast of the site).

7.2.26. The ZTV study indicates that development on the site would potentially be seen fairly extensively from the more open, lower-lying area to the south and southeast, which is a much modified landscape including lakes and a landfill site within former quarry workings. Relatively extensive areas of visibility are also indicated from the south facing slopes which lie within the AONB to the north beyond the M25 at distances of approximately 0.7-1.5km; and from north and northwest facing slopes to the north of Bletchingley (also within the AONB, beyond 0.5km from the site). A smaller area of visibility is shown from the area of AONB and Gatton Park to the west of Merstham, at distances of 1.7km and more.

7.3. Site observations and appraisal

7.3.1. Site work indicates that visibility would be notably less than indicated by the ZTV study. The vegetation around the site and the motorway embankments to the north and east provide containment and would limit the potential for notable effects on landscape character and prevent the perception of coalescence. Approaching Merstham from the east, the stretch of Bletchingley Road which passes the site already has the character of settlement edge – with an increasing frequency of buildings seen set amongst or beyond mature hedges and trees.

7.3.2. In views from the AONB, any development within the site would be seen at a distance as roofs set amongst trees. In practice outward views towards the site from the AONB to the west and east are considerably more limited by localised vegetation than the ZTV Study indicates. The footpaths ascending open slopes of the AONB to the north will have some visibility of development within the site, and in this context the site would be seen as part of a pattern of built form amongst trees and the motorway corridors would continue to be the more eye-catching and detrimental feature in the views. Effects on the special qualities of the AONB are likely to be negligible.

7.3.3. Sunken lanes, and hedges and trees alongside roads and forming field boundaries limit views towards the site from the AGLV in and around South Nutfield. Effects on the AGLV are likely to be negligible.

7.4. Conclusion

- 7.4.1. The appraisal above corroborates the findings of the various supporting studies which led to the identification of the site as an SUE. The policy requirements to retain and enhance woodland, ensure an appropriate transition to the adjacent countryside (which is within the AONB) and to protect the character of Bletchingley Road are important measures to be carried through to both the consenting process and subsequent detailed matters or modifications – as these requirements mitigate against the potential for adverse impacts.

8.0 SSW2: Land at Sandcross Lane, South Park, Reigate

8.1. Site Description

8.1.1. The site comprises arable fields to the southwest of Reigate, north of Slipshatch Road. The policy proposes approximately 260 new homes including retirement accommodation, local shops, a health facility and public open space.

8.2. Desk Study

Sustainable Urban Extensions: Broad Geographic Locations Technical Report (November 2012)

8.2.1. As noted at section 2.1 above, the site forms part of Area G within this study. The majority of this area, including the site, is noted as not being subject to any landscape designations (either AONB or AGLV). It is identified as having a “*generally unified*” character with some variety where it meets the urban fringe, resulting in a medium to high sensitivity to change. The contribution to Green Belt purposes is noted as being limited by previously developed land (garden centre and former nursery site). A mix of strong and weaker potential boundary features are identified, and it is noted that the area does not contribute to settlement separation.

Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report (June 2016)

8.2.2. In Annex 3 of the Technical Report, the same points are made in respect of landscape value and designations as noted at Stage 1. The site is also noted as including a school and sports fields and the garden centre (shown in the plan in the June 2016 Green Belt Review), although these were excluded from the SUE at the Reg. 18 stage.

8.2.3. In terms of character the site is identified as being within the Low Weald Farmland (WF2) character area and is noted as being an area of low-lying farmland with the typical medium-large scale fields and strong hedgerows of the character area. Retention of the field pattern and hedgerows are noted as design aims.

8.2.4. It is noted that there are no public rights of way within the site, or formal or informal recreational uses.

- 8.2.5. Drawing on the June 2016 Green Belt Review, the site is identified as making a low contribution to the Green Belt, being of ‘Lower importance’ for all criteria except for being of ‘Moderate importance’ in terms of safeguarding the countryside from encroachment.

Development Management Plan (DMP) Regulation 18 Consultation (August 2016)

- 8.2.6. The site is described as follows:

“The site comprises an open arable field which is actively used for agriculture and is bounded to the west and south by rural roads. King George’s playing fields adjoin the western boundary of the site, with further agricultural fields beyond to the south and west.

The existing school and its playing fields are excluded from ... the potential development site boundary, as is the garden centre and youth centre at the junction of Sandcross Lane and Slipshatch Road.”

- 8.2.7. No landscape or visual constraints to development are identified and opportunities include the potential to *“enhance local green infrastructure/ biodiversity value and provide open space to complement adjoining sports facilities.”*

- 8.2.8. The document also notes that: *“The site has a relatively low overall priority for protection - Rank 5 (5 lowest, 1 highest). In particular, the land parcel is identified as having strong, defensible boundaries meaning that its development would have a relatively limited impact on urban sprawl.”*

- 8.2.9. Required design and mitigation measures identified in the draft policy include:

- *“Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside ...*
- *Ensure an appropriate transition to adjoining countryside, particularly by providing a significant area of new public open space in the west of the site*
- *Protection of existing trees and hedgerows”*

**Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report
Boundary Strength Addendum (October 2017)**

- 8.2.10. The Addendum report describes the new Green Belt boundaries that would be formed by the development of site ERM1 as being “*STRONG: road and dense hedgerow (south and west), hedgerow and intermittent tree belt (north)*”, and identifies “*Additional tree or hedgerow planting along the northern boundary*” as a potential mitigation action.

Development Management Plan Regulation 19 Consultation (January 2018)

- 8.2.11. The boundaries and extent of the site are unaltered from the Regulation 18 consultation document in the pre-submission draft of the DMP. Required design and mitigation measures identified in the policy are the same as the previous draft except for a reference to the requirement for tree or hedgerow planting along the northern boundary – drawing on the Green Belt Boundary Strength report as noted above.
- 8.2.12. The supporting ‘explanation’ includes similar points to those made at the Regulation 18 stage within the site description and constraints and opportunities analysis as set out above, with an additional note regarding the importance of hedgerows as follows: “*The hedgerows which bound the site on Slipshatch Road, Whitehall Lane and Sandcross Lane are important undesignated historic landscape features and form a group with neighbouring hedgerows, and should be retained as green lane/green corridors with buffers using a ‘parkway’ principle.*”
- 8.2.13. The evidence base for this draft of the DMP includes an updated Green Belt Review (October 2017), in which the site scores a rank of 4 rather than 5, although this does not reflect a change to the assessment of the site (just the scoring system) as set out at section 2.5 above.
- 8.2.14. The Sustainability Appraisal (October 2017)-which provides part of the evidence base for the Reg. 19 DMP rates the development of site SSW2 as ‘expected to have a neutral impact’ on achieving the sustainability objective of protecting or enhancing landscape character.

Site specific representations

8.2.15. Representations on behalf of the potential site developer (Representor No. 0148) were made in response to the Reg. 19 DMP. Within these representations no specific comments are made on either Green Belt or landscape and visual matters. The representations note a desire on the part of the developer to build 300-350 homes and an indicative masterplan was submitted by the Representor for the site which illustrates hedgerow retention and landscape corridors along those hedgerows, and open space to the southwest of the site.

Landscape character

8.2.16. The Surrey Landscape Character Assessment (2015) identifies the site as being located within character area WF2 Flanchford to Horley Low Weald Farmland, lying in the central section of the character area which extends in a band roughly north-south between the River Mole to the west and the urban edges to the east. The key characteristics of the landscape type are identified as:

- *“Lowland weald, gently undulating between roughly 50m AOD and 100m AOD.*
- *Predominately farmland, with larger scale fields than the Wooded Low Weald (Type WW) to the west.*
- *Includes a well-developed hedgerow network and shaws, although generally intensively managed.*
- *Mature trees are often found within fields, but mature trees within the hedgerow network are relatively limited, particularly in comparison with the Wooded Low Weald (Type WW) to the west.*
- *Isolated farmsteads and sporadic small groups of rural dwellings pepper the area. The eastern area bordering Kent has very limited settlement, while to the west, ribbon development of houses along roads is more frequent.*
- *Crossed by network of watercourse and brooks feeding in to the River Eden and Mole.*
- *Historic landscape pattern associated with farming and grazing of animals.*
- *Long distance views framed by vegetation are possible, particularly from more open, elevated locations, including views of the greensand hills and Chalk Ridge to the north.”*

8.2.17. The more detailed key characteristics for the character area note a slightly greater presence of settlement and more limited woodland cover than is typical of the landscape type.

8.2.18. The assessment also provides extensive recommendations for the protection and enhancement of character. Recommendations which are particularly pertinent to the potential landscape and visual impacts of the proposed SUE are:

- *“Conserve the rural, largely unsettled landscape.*
- *Conserve the pattern and character of existing settlements, resisting spread and coalescence of settlement.*
- *Conserve and enhance the landscape setting to villages and edge of settlement.*
- *Any new development should conserve the enclosure and vegetated character of the surrounding landscape.*
- *Built form to be integrated by woodland edges, shaws, hedgerows and open areas linked to the existing network.*
- *Ensure new development respects existing rural characteristics and conserves distinctive open areas, greens and commons.*
- *New transport or other infrastructure to be integrated in to the landscape by careful siting and additional planting that respects the scale and pattern of the landscape.*
- *Ensure new development does not impact on the existing ‘dark skies’ within this sparsely settled area...”*

8.2.19. The Borough-Wide Landscape and Townscape Character Assessment (2008) identifies the urban area adjacent to the site as being ‘1930-50’s Suburbia’ and the Slipshatch Road to the south of the site as a ‘key gateway’ where it enters the town.

Landscape value

8.2.20. As shown on Figure 6569_SSW2, the site lies outside of both the AONB and AGLV designations. It is also outside of both the ‘Recommended Additional Areas of Surrey Hills AONB’ and the ‘Secondary Potential Additional Areas of Surrey Hills AONB’ identified by the 2013 AONB Boundary review study.

- 8.2.21. The AONB as currently designated lies more than 2km from the site, and the AGLV lies 0.4km to the northwest. Reigate Priory Registered Park and Garden lies 0.7km to the north of the site.

ZTV Study

- 8.2.22. Figure 6569_SSW2 shows a ZTV study for the proposed SUE, based on a building height of 8.5m and including areas of settlement and woodland in the modelling. Visibility is likely to be slightly less extensive than indicated – particularly in the urban area to the east, where the screening effects of garden vegetation and street trees is not allowed for; and in areas where there are substantive hedgerows or tree lines (for example in the areas south of the site).
- 8.2.23. The ZTV study indicates that development on the site would potentially be seen fairly extensively from the river valley to the south and southeast, although this will be less than shown due to the substantial field boundaries as discussed above. Relatively extensive areas of visibility are also indicated to the west and northwest within the AGLV, although this decreases rapidly beyond approximately 1.5km from the site. Views from other directions will be limited and there would be no visibility from Reigate Priory RPG.

8.3. Site observations and appraisal

- 8.3.1. Site work indicates that visibility would be notably less than indicated by the ZTV study. The large hedgerows and lines of trees along hedges and watercourses fragment and limit visibility from the landscape to the west and south of the site. In practice development within the site will be visible above hedges from the lanes which runs around the south and west edges, and from the playing fields to the north and BMX park to the southeast.
- 8.3.2. The existing housing along Slipshatch Road means that there is currently a transition from the urban edge to countryside halfway along the southern boundary of the site. This change is emphasised by the lines of trees and small area of woodland within the site at the same point. Development within the site should retain this transition in a similar location.

8.3.3. There are likely to be views of development within the site from the footpaths within the AGLV to the north of Clay Lane. In this context views will be seen filtered through intervening vegetation and in the context of the existing nearby urban edge to the north of the site. Effects on the special qualities of the AGLV are likely to be negligible.

8.4. Conclusion

8.4.1. The appraisal above corroborates the findings of the various supporting studies which led to the identification of the site as an SUE. The policy requirements to retain and enhance woodland, ensure an appropriate transition to the adjacent countryside via open space to the west of the site and protect existing trees and hedgerows are important measures to be carried through to both the consenting process and subsequent detailed matters or modifications – as these requirements mitigate against the potential for adverse impacts.

9.0 SSW6: Land west of Castle Drive

9.1. Site Description

9.1.1. The site comprises an area of amenity land to the southwest of Reigate, south and west of Castle Drive. The policy proposes approximately 10 new homes.

9.2. Desk Study

Sustainable Urban Extensions: Broad Geographic Locations Technical Report (November 2012)

9.2.1. As noted at section 2.1 above, the site forms part of Area G within this study. The area is noted as not being subject to any landscape designations (either AONB or AGLV). It is identified as having a “*generally unified*” character some variety where it meets the urban fringe, resulting in a medium to high sensitivity to change.

Progression to Regulation 18 DMP

9.2.2. The June 2016 Green Belt review shows the site initially considered, which was a far larger area extending westwards from the proposed SUE. This was revised prior to the Regulation 18 DMP, which included the site as part of SSW7.

Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report Boundary Strength Addendum (October 2017)

9.2.3. The Addendum report describes the new Green Belt boundaries that would be formed by the development of site SSW6 as being “*MODERATE: low hedgerow (west)*” and identifies “*Additional tree or hedgerow planting along the western boundary.*” as a potential mitigation action. The accompanying plan indicates that the final site boundary was being considered within the addendum report.

Development Management Plan Regulation 19 Consultation (January 2018)

9.2.4. The site is described as “*a narrow triangle of amenity land to the rear of existing residential properties*”. Required design and mitigation measures identified by policy SSW6 include:

- “*Deliver biodiversity and green infrastructure enhancements ...*”

- *Ensure an appropriate transition to adjoining countryside, including consideration of setting of the backdrop to the Hartswood Manor approach drive.*
- *Protection of existing trees and hedgerows*
- *Additional tree or hedgerow planting along the western boundary to strengthen the green belt boundary.”*

9.2.5. The Sustainability Appraisal (October 2017)-which provides part of the evidence base for the Reg. 19 DMP rates the development of site SSW6 as ‘expected to have a negative impact’ on achieving the sustainability objective of protecting or enhancing landscape character, describing the site as “*small part of a larger parcel, but was a logical infill to the existing urban area*”.

Landscape character

9.2.6. The Surrey Landscape Character Assessment (2015) identifies the site as being located within character area WF2 Flanchford to Horley Low Weald Farmland. The site however, is not typical of that wider countryside, as it is a small area of amenity land adjacent to housing.

9.2.7. The character assessment provides extensive recommendations for the protection and enhancement of character. Recommendations which are particularly pertinent to the potential landscape and visual impacts of the proposed SUE are:

- *“Conserve and enhance the landscape setting to villages and edge of settlement.*
- *Any new development should conserve the enclosure and vegetated character of the surrounding landscape.*

9.2.8. The Borough-Wide Landscape and Townscape Character Assessment (2008) identifies the urban area adjacent to the site as being ‘1930-50’s Suburbia’ and Dover’s Green Road to the east of the site as a ‘key gateway’ where it enters the town.

Landscape value

9.2.9. The site lies outside of both the AONB and AGLV designations. It is also outside of both the ‘Recommended Additional Areas of Surrey Hills AONB’ and the ‘Secondary Potential Additional Areas of Surrey Hills AONB’ identified by the 2013 AONB Boundary review study.

- 9.2.10. The AONB as currently designated lies more than 2km from the site, and the AGLV lies 1.3km to the northwest. Reigate Priory Registered Park and Garden lies approximately 1.3km to the north of the site.

9.3. Site observations and appraisal

- 9.3.1. The site is a small area of amenity land which appears to be used by local residents judging from the play equipment and garden furniture placed within the space. It is a self-contained space set between housing and playing fields. The minor development proposed would have negligible effects on landscape or views as it would be indistinguishable from the existing urban edge beyond the confines of the site and nearby areas of the playing fields.

9.4. Conclusion

- 9.4.1. The appraisal above corroborates the findings of the various supporting studies which led to the identification of the site as an SUE. There is no potential for adverse landscape or visual impacts, and the main value of the site is its current recreational use rather than its contribution to the character or landscape setting of this area of Reigate.

10.0 SSW7: Hartswood Nursery

10.1. Site Description

10.1.1. The site comprises a plant nursery site to the southwest of Reigate, south of Castle Drive. The policy proposes approximately 25 new homes.

10.2. Desk Study

Sustainable Urban Extensions: Broad Geographic Locations Technical Report (November 2012)

10.2.1. As noted at section 2.1 above, the site forms part of Area G within this study. The majority of the search area, including the site, is noted as not being subject to any landscape designations (either AONB or AGLV). It is identified as having a “*generally unified*” character some variety where it meets the urban fringe, resulting in a medium to high sensitivity to change.

Progression to Regulation 18 DMP

10.2.2. The June 2016 Green Belt Review shows the site initially considered, includes additional areas fronting onto the A217 and along the private road to the south. This was revised prior to the Regulation 18 DMP, which also included what became SSW6 as part of this site.

Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report Boundary Strength Addendum (October 2017)

10.2.3. The Addendum report describes the new Green Belt boundaries that would be formed by the development of site SSW7 as being “*MODERATE: road (east), private track, building curtilages, intermittent tree belt (south), intermittent tree belt (west)*”, also noting that “*the western boundary is weak, consisting of an intermittent tree belt and a fence between the site and the adjoining parcel. However, the nearest strong physical border to the west is a significant distance away, and the weak western boundary is only approximately 100m long*”. The Addendum report identifies “*Additional tree or hedgerow planting along the western and southern boundaries; consideration of existing trees for TPOs*” as a potential mitigation action.

Development Management Plan Regulation 19 Consultation (January 2018)

10.2.4. The site is described as “*an existing residential dwelling and area of adjoining land sometimes used for grazing. The Hartwood Nursery site fronts onto the A217, with a small common land verge in between and is adjacent to two Grade II listed buildings.*” Required design and mitigation measures identified by policy SSW7 include:

- *“Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside ...*
- *Ensure an appropriate transition to adjoining countryside*
- *Protection of existing trees and hedgerows, particularly fronting onto the A217*
- *Design measures to protect the setting of adjoining listed buildings and including the Hartwood Manor approach drive.*
- *Protect and respect the appearance of the common land verge*
- *Additional tree or hedgerow planting along the western and southern boundaries to strengthen the green belt boundary.”*

10.2.5. The evidence base for this draft of the DMP includes an updated Green Belt Review (October 2017), but it does not appear to have taken account of the final site boundary.

10.2.6. The Sustainability Appraisal (October 2017)-which provides part of the evidence base for the Reg. 19 DMP rates the development of site SSW7 as ‘expected to have a neutral impact’ on achieving the sustainability objective of protecting or enhancing landscape character.

Landscape character

10.2.7. The Surrey Landscape Character Assessment (2015) identifies the site as being located within the urban area.

10.2.8. The Borough-Wide Landscape and Townscape Character Assessment (2008) identifies the urban area adjacent to the site as being ‘1930-50’s Suburbia’ and Dovers Green Road to the east of the site as a ‘key gateway’ where it enters the town.

Landscape value

- 10.2.9. The site lies outside of both the AONB and AGLV designations. It is also outside of both the 'Recommended Additional Areas of Surrey Hills AONB' and the 'Secondary Potential Additional Areas of Surrey Hills AONB' identified by the 2013 AONB Boundary Review study.
- 10.2.10. The AONB as currently designated lies more than 2km from the site, and the AGLV lies 1.4km to the northwest. Reigate Priory Registered Park and Garden lies approximately 1.5km to the north of the site.

10.3. Site observations and appraisal

- 10.3.1. The site is a former nursery site which is not currently in use. It is a self-contained space set between housing and playing fields. The minor development proposed would have negligible effects on landscape or views as it would be indistinguishable from the existing urban edge beyond the adjacent roads as they pass the site and nearby areas of the playing fields. Retention of the open common land which fronts onto Dovers Green Road will retain the locally characteristic transition from countryside to urban area with houses set back beyond green space.

10.4. Conclusion

- 10.4.1. The appraisal above corroborates the findings of the various supporting studies which led to the identification of the site as an SUE. There is limited potential for adverse landscape or visual impacts, and the site makes no current contribution to the character or landscape setting of this area of Reigate.

11.0 SSW9: Land at Dovers Farm, Woodhatch, Reigate

11.1. Site Description

11.1.1. The site comprises arable fields to the south of Reigate, east of the A217 (Dovers Green Road) and south of Ashdown Road, bounded by mature hedgerows and tree belts. The policy proposes approximately 100 new homes, including up to 25 units of retirement accommodation for older people.

11.2. Desk Study

Sustainable Urban Extensions: Broad Geographic Locations Technical Report (November 2012)

11.2.1. As noted at section 2.1 above, the site forms part of Area H within this study. The area is noted as not being subject to any landscape designations (either AONB or AGLV). It is identified as having a “*generally unified*” character with some variety where it meets the urban fringe, resulting in a medium to high sensitivity to change. The contribution to Green Belt purposes is noted as being limited in the western part of the area containing the site by previously developed land (former nursing home and row of terraced houses) in the area around Dovers Farm. A mix of strong potential boundary features are identified, and it is noted that the western part of the area, containing the site, does not contribute to settlement separation.

Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report (June 2016)

11.2.2. In Annex 3 of the Technical Report, the same points are made in respect of landscape value and designations as noted at Stage 1. The site is also noted as including a former nursing home and a number of residential units, although these were excluded from the SUE at the Regulation 18 stage.

11.2.3. In terms of character the site is identified as being within the Low Weald Farmland (WF2) character area and is noted as being an area of low-lying farmland with the typical medium-large scale fields and strong hedgerows of the character area. Retention of the field pattern and hedgerows are noted as design aims.

- 11.2.4. It is noted that a bridleway runs along the southern boundary of the site and that there are no formal or informal recreation units within it.
- 11.2.5. Drawing on the June 2016 Green Belt Review, the site is identified as making a relatively low contribution to the Green Belt, being of ‘Moderate importance’ for the checking urban sprawl and safeguarding countryside criteria and being of ‘Lower importance’ in terms of settlement separation and setting.

Development Management Plan (DMP) Regulation 18 Consultation (August 2016)

- 11.2.6. The site is described as follows:

“The site comprises an open arable field which is actively used for agriculture, along with a belt of woodland in the east. The land is bounded to the west and south by roads, including the A217. Further agricultural fields – and a small cluster of workshop/warehouse units – adjoin the site beyond to the south, with an area of public open space to the west.

The grounds of the recently developed Dovers Nursing Homes are excluded from identified potential development site boundary, as are the individual residential properties along Dovers Green Road.”

- 11.2.7. The illustrated site boundary accompanying the draft policy reflects this description with those areas to the west excluded. This represents a refinement of the site boundary as considered by the June 2016 Green Belt Review which forms part of the DMP evidence base, the result of which is that the western boundary follows the garden boundaries of existing properties adjacent to the A217 rather than the road itself.
- 11.2.8. No landscape or visual constraints to development are identified and the document also notes in reference to the June 2016 Green Belt Review that *“The site has a relatively low overall priority for protection – Rank 4 (5 lowest, 1 highest). Development of parcel would have a limited impact on settlement separation but the parcel has average strength boundaries and its development could therefore result in some encroachment into the countryside.”*
- 11.2.9. Required design and mitigation measures identified in the draft policy include:

- *“Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside ...*
- *Ensure an appropriate transition to adjoining countryside, particularly to the south of the site*
- *Design measures to protect the setting of adjoining listed buildings*
- *Protect and respect the appearance of the common land verge*
- *Protection of existing trees and hedgerows, in particular the area of woodland along Lonesome Lane should be retained*
- *Additional tree or hedgerow planting along the southern boundary to strengthen the green belt boundary”*

Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report Boundary Strength Addendum (October 2017)

11.2.10. The Addendum report describes the new Green Belt boundaries that would be formed by the development of site SSW9 as being *“STRONG: road (west), road and dense tree belt (east), private track, building curtilages, and varying tree belt (south)”*, and identifies *“Additional tree or hedgerow planting along the southern boundary”* and *“consideration of existing trees for TPOs”* as potential mitigation actions.

Development Management Plan Regulation 19 Consultation (January 2018)

11.2.11. The boundaries and extent of the site are unaltered from the Regulation 18 consultation document in the pre-submission draft of the DMP; required design and mitigation measures identified in the policy are also the same as the previous draft.

11.2.12. The supporting ‘explanation’ notes that: *“The site comprises an open arable field which is actively used for agriculture, along with a belt of woodland in the east. The land is bounded to the west and south by roads, including the A217. Further agricultural fields - and a small cluster of workshop/warehouse units – adjoin the site beyond to the south, with an area of public open space to the west.”* Although as noted above the western boundary follows the garden boundaries of existing properties adjacent to the A217 rather than the road itself.

11.2.13. The evidence base for this draft of the DMP includes an updated Green Belt Review (October 2017), in which the site scores a rank of 3 rather than 4, although this does

not reflect a change to the assessment of the site (just the scoring system) as set out at section 2.5 above.

- 11.2.14. The Sustainability Appraisal (October 2017)-which provides part of the evidence base for the Reg. 19 DMP rates the development of site SSW9 as ‘expected to have a negative impact’ on achieving the sustainability objective of protecting or enhancing landscape character.

Landscape character

- 11.2.15. The Surrey Landscape Character Assessment (2015) identifies the site as being located within character area WF2 Flanchford to Horley Low Weald Farmland, lying in the central section of the character area which extends in band roughly north-south between the River Mole to the west and the urban edges to the east. The key characteristics of the landscape type are identified as:

- *“Lowland weald, gently undulating between roughly 50m AOD and 100m AOD.*
- *Predominately farmland, with larger scale fields than the Wooded Low Weald (Type WW) to the west.*
- *Includes a well-developed hedgerow network and shaws, although generally intensively managed.*
- *Mature trees are often found within fields, but mature trees within the hedgerow network are relatively limited, particularly in comparison with the Wooded Low Weald (Type WW) to the west.*
- *Isolated farmsteads and sporadic small groups of rural dwellings pepper the area. The eastern area bordering Kent has very limited settlement, while to the west, ribbon development of houses along roads is more frequent.*
- *Crossed by network of watercourse and brooks feeding in to the River Eden and Mole.*
- *Historic landscape pattern associated with farming and grazing of animals.*
- *Long distance views framed by vegetation are possible, particularly from more open, elevated locations, including views of the greensand hills and Chalk Ridge to the north.”*

11.2.16. The more detailed key characteristics for the character area note a slightly greater presence of settlement and more limited woodland cover than is typical of the landscape type.

11.2.17. The assessment also provides extensive recommendations for the protection and enhancement of character. Recommendations which are particularly pertinent to the potential landscape and visual impacts of the proposed SUE are:

- *“Conserve the rural, largely unsettled landscape.*
- *Conserve the pattern and character of existing settlements, resisting spread and coalescence of settlement.*
- *Conserve and enhance the landscape setting to villages and edge of settlement.*
- *Any new development should conserve the enclosure and vegetated character of the surrounding landscape.*
- *Built form to be integrated by woodland edges, shaws, hedgerows and open areas linked to the existing network.*
- *Ensure new development respects existing rural characteristics and conserves distinctive open areas, greens and commons.*
- *New transport or other infrastructure to be integrated in to the landscape by careful siting and additional planting that respects the scale and pattern of the landscape.*
- *Ensure new development does not impact on the existing ‘dark skies’ within this sparsely settled area...”*

11.2.18. The Borough-Wide Landscape and Townscape Character Assessment (2008) identifies the urban area adjacent to the site as being ‘1960’s-1970’s modern estates’ and Dovers Green Lane to the south west of the site as a ‘key gateway’ where it enters the town.

Landscape value

11.2.19. As shown on Figure 6569_SSW9, the site lies outside of both the AONB and AGLV designations. It is also outside of both the ‘Recommended Additional Areas of Surrey Hills AONB’ and the ‘Secondary Potential Additional Areas of Surrey Hills AONB’ identified by the 2013 AONB Boundary Review study.

- 11.2.20. The AONB as currently designated lies more than 3km from the site, and the AGLV lies 1.5km to the northwest. Reigate Priory Registered Park and Garden lies 1.3km to the northwest of the site.

ZTV Study

- 11.2.21. Figure 6569_SSW9 shows a ZTV study for the proposed SUE, based on a building height of 8.5m and including areas of settlement and woodland in the modelling. The ZTV indicates that views of development on the site would potentially be quite widespread across open country to the south and northwest to 2km or more while to the east potential views would only be widespread within approximately 600m and decreasing rapidly beyond that. Intermittent potential views are also indicated in urban areas to the north and west.
- 11.2.22. Visibility is likely to be considerably less extensive than indicated however, and in reality, views beyond the immediate vicinity of the site are unlikely. This is due to dense vegetation surrounding the perimeter of the site and also the extensive screening in this area provided by other localised vegetation not modelled within the ZTV – such as garden vegetation, street trees, substantive hedgerows and tree belts (particularly along road corridors).

11.3. Site observations and appraisal

- 11.3.1. The site consists of fields which are contained by existing housing, tree belts and a commercial site. Development of the site would have limited effects on the wider landscape or views as there are few views into the site which would not already feature more nearby built form and/or significant screening of the development. Retention and strengthening of the woodland belts to the east and south of the site will maintain the separation between Reigate and the hamlet along Lonesome Lane. Retention of the open space which fronts onto Dovers Green Road will retain the locally characteristic transition from countryside to urban area with houses set back beyond green space.

11.4. Conclusion

- 11.4.1. The appraisal above corroborates the findings of the various supporting studies which led to the identification of the site as an SUE. The requirements for retention and strengthening of tree belts; and an appropriate transition to the countryside to the south are useful measures to be carried through to both the consenting process and subsequent detailed matters or modifications – as these requirements mitigate against the limited potential for adverse impacts.

12.0 NWH1: Land at Meath Green Lane, Horley

12.1. Site Description

- 12.1.1. The site comprises agricultural fields given over to pasture, bordered to the north by the Burstow Stream, a tributary of the River Mole. It incorporates a number of existing detached properties set within extensive gardens and accessed off Meath Green Lane, which bisects the site. The site currently sits in open countryside and separated from the edge of Horley although is bordered to the south, west and southeast by the Horley North West Sector development.
- 12.1.2. The policy proposes approximately 75 new homes and new public open space along the river corridor to ‘link up the Riverside Green Chain’.

12.2. Desk Study

Sustainable Urban Extensions: Broad Geographic Locations Technical Report (November 2012)

- 12.2.1. As noted at section 2.1 above, the site forms part of Area O within this study. The area is noted as not being subject to any landscape designations (either AONB or AGLV). It is identified as having “*generally unified*” character although graduates “*rapidly from urban to rural with generally visually monotonous farmland landscape*”, resulting in a low to medium sensitivity to change.
- 12.2.2. Although not forming part of the Green Belt the technical report applies the same principles to this area as being part of the ‘Rural Surrounds of Horley’. It is noted that the western part of the area, containing the site, is “*largely undeveloped and the countryside is very open; however, the backdrop of this may change when the North West Sector is developed*”.

Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report (June 2016)

- 12.2.3. In Annex 3 of the Technical Report it is noted that the site was previously excluded from the North West Sector development area due to being of different character to the rest of the sector. It is noted that it contains sporadic residential and commercial

buildings although a number of these were excluded from the SUE at the Regulation 18 stage.

- 12.2.4. In terms of character, the site is identified as being within the Low Weald Farmland (WF2) character area and is noted as being predominantly farmland with the typical medium-large scale fields and strong hedgerows of the character area. Retention of hedgerow patterns and rural lanes are noted as design aims along with consideration of potential for long range views.
- 12.2.5. It is noted that there are footpaths running along part of the southern and western boundary of the site and that there are no formal or informal recreation uses, other than the footpaths, within it. It is also noted there is opportunity to ‘complete’ the riverside green chain.
- 12.2.6. Drawing on the June 2016 Green Belt Review, although not currently within the Green Belt, the site is identified as making a moderate contribution to the ‘Rural Surrounds of Horley’. It is noted as being of ‘Lower importance’ for checking sprawl and setting, ‘Moderate importance’ for settlement separation and ‘Higher importance’ for safeguarding the countryside.

Development Management Plan (DMP) Regulation 18 Consultation (August 2016)

- 12.2.7. The site is described as follows:

“The site includes a residential dwelling set within a large curtilage along and a small agricultural holding comprising fields on either side of Meath Green Lane.

The site adjoins the Horley North West development and proposed Riverside Green Chain. To the north, it is bounded by the Burstow Stream, with open countryside beyond.

A number of individual residential properties fronting onto Meath Green Lane and in private ownership are excluded from the potential development site boundary.”

- 12.2.8. No landscape or visual constraints to development are identified and the document also notes in reference to the June 2016 Green Belt Review *“Not applicable – the site is not within the Green Belt”*. Noted opportunities for the site include completing the Riverside Green Chain and potential to integrate with the North West Sector.

12.2.9. Required design and mitigation measures identified in the draft policy include:

- *“Deliver biodiversity and green infrastructure enhancements, including links to the wider countryside ...*
- *Protection and enhancement of trees and hedgerow, particularly on boundaries*
- *Design to respect and enhance the semi-rural character of Meath Green Lane”*

Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report Boundary Strength Addendum (October 2017)

12.2.10. The Addendum report describes the new settlement boundaries that would be formed by the development of site NWH1 as being *“STRONG: dense tree belt (west), river (north), future edge of urban area once Horley North West Sector is built up (east)”*, and identifies the *“Eastern boundary should be defined significantly more clearly as part of the North West Sector development.”* as a potential mitigation action.

Development Management Plan Regulation 19 Consultation (January 2018)

12.2.11. The boundaries of the site are drawn in the pre-submission draft of the DMP to incorporate some of the residential properties fronting Meath Green Lane that were excluded from the Regulation 18 consultation document. Required design and mitigation measures identified in the policy are also the same as the previous draft.

12.2.12. The supporting ‘explanation’ notes that: *“The land at Meath Green Lane is on located on the northern edge of the Horley North West new neighbourhood and adjoins the Riverside Green Chain”* and that *“There is also the opportunity to secure completion of the publicly accessible Riverside Green Chain to the north of Horley”*.

12.2.13. The evidence base for this draft of the DMP includes an updated Green Belt Review (October 2017), in which the site is identified as having the same moderate contribution to the ‘Rural Surrounds of Horley’ as in the Reg. 18 review.

12.2.14. The Sustainability Appraisal (October 2017) – which provides part of the evidence base for the Reg. 19 DMP rates the development of site NWH1 as ‘expected to have a negative impact’ on achieving the sustainability objective of protecting or enhancing landscape character *“due to introducing a large amount of housing into a rural area.”* This does not however seem to take account of the site bordering the

consented North West Sector, as described above. It does also note though that *“the site presents the opportunity to complete the Riverside Green Chain around Horley, potentially having a very beneficial impact on health and wellbeing.”*

Landscape character

12.2.15. The Surrey Landscape Character Assessment (2015) identifies the site as being located within character area WF2 Flanchford to Horley Low Weald Farmland, lying on the western edge of the character area which extends in a band roughly north-south between the River Mole to the west and the urban edges to the east. The key characteristics of the landscape type are identified as:

- *“Lowland weald, gently undulating between roughly 50m AOD and 100m AOD.*
- *Predominately farmland, with larger scale fields than the Wooded Low Weald (Type WW) to the west.*
- *Includes a well-developed hedgerow network and shaws, although generally intensively managed.*
- *Mature trees are often found within fields, but mature trees within the hedgerow network are relatively limited, particularly in comparison with the Wooded Low Weald (Type WW) to the west.*
- *Isolated farmsteads and sporadic small groups of rural dwellings pepper the area. The eastern area bordering Kent has very limited settlement, while to the west, ribbon development of houses along roads is more frequent.*
- *Crossed by network of watercourse and brooks feeding in to the River Eden and Mole.*
- *Historic landscape pattern associated with farming and grazing of animals.*
- *Long distance views framed by vegetation are possible, particularly from more open, elevated locations, including views of the greensand hills and Chalk Ridge to the north.”*

12.2.16. The more detailed key characteristics for the character area note a slightly greater presence of settlement and more limited woodland cover than is typical of the landscape type.

12.2.17. The assessment also provides extensive recommendations for the protection and enhancement of character. Recommendations which are particularly pertinent to the potential landscape and visual impacts of the proposed SUE are:

- *“Conserve the rural, largely unsettled landscape.*
- *Conserve the pattern and character of existing settlements, resisting spread and coalescence of settlement.*
- *Conserve and enhance the landscape setting to villages and edge of settlement.*
- *Any new development should conserve the enclosure and vegetated character of the surrounding landscape.*
- *Built form to be integrated by woodland edges, shaws, hedgerows and open areas linked to the existing network.*
- *Ensure new development respects existing rural characteristics and conserves distinctive open areas, greens and commons.*
- *New transport or other infrastructure to be integrated in to the landscape by careful siting and additional planting that respects the scale and pattern of the landscape.*
- *Ensure new development does not impact on the existing ‘dark skies’ within this sparsely settled area....”*

Landscape value

12.2.18. As shown on Figure 6569_NWH1, the site lies outside of both the AONB and AGLV designations. It is also outside of both the ‘Recommended Additional Areas of Surrey Hills AONB’ and the ‘Secondary Potential Additional Areas of Surrey Hills AONB’ identified by the 2013 AONB Boundary review study. The AONB as currently designated lies more than 6km from the site.

ZTV Study

12.2.19. Figure 6569_NWH1 shows a ZTV study for the proposed SUE, based on a building height of 8.5m and including areas of settlement and woodland in the modelling. The ZTV indicates that views of development on the site would potentially be quite widespread within approximately 1km of the site although would reduce quite rapidly beyond that. Much of the area illustrated as having potential visibility, except to the north of the site, will be occupied by the Horley North West Sector development and in reality screening by buildings and new vegetation within this

development would significantly reduce the extent of potential visibility. Views from the north would in practice be more limited than indicated due to the substantial hedgerows and hedgerow trees that are present in this area.

12.3. Site observations and appraisal

12.3.1. The site consists of small irregularly shaped fields which are bounded by strong hedgerows and hedgerow trees. At present, from within the site there are glimpsed views out to the northern edge of Horley and to properties along Meath Lane. This presence of urban influences will increase as Horley North West Sector is completed. Development of the site would have limited effects on the wider landscape or views as there are few views into the site which would not already feature more nearby built form and/or significant screening of the development. Retention and strengthening of the tree cover within and around the boundaries of the site will ensure a gradual transition between the urban area to the south and the area of countryside to the north along Meath Green Lane.

12.4. Conclusion

12.4.1. The appraisal above corroborates the findings of the various supporting studies which led to the identification of the site as an SUE. The requirements for retention and strengthening of hedgerows and tree cover; and protection of the character of Meath Green Lane are important measures to be carried through to both the consenting process and subsequent detailed matters or modifications – as these requirements mitigate against the potential for adverse impacts on landscape character.

13.0 NWH2: Land at Bonehurst Road, Horley

13.1. Site Description

13.1.1. The site comprises an area of informal amenity land to the north of Horley, to the west of the A23 (Bonehurst Road). The policy proposes approximately 40 new homes and a new public open space along the river corridor to link up the Riverside Green Chain.

13.2. Desk Study

Sustainable Urban Extensions: Broad Geographic Locations Technical Report (November 2012)

13.2.1. As noted at section 2.1 above, the site forms part of Area O within this study. The area is noted as not being subject to any landscape designations (either AONB or AGLV). It is identified as having “*generally unified*” character and some variety where it meets the urban fringe, resulting in a low to medium sensitivity to change.

Progression to Regulation 18 DMP

13.2.2. The June 2016 Green Belt Review shows the site initially considered was slightly smaller than the proposed SUE. This was revised prior to the Regulation 18 DMP, with the northwest boundary slightly extended to follow the river, which included the site as part of NWH2.

Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report Boundary Strength Addendum (October 2017)

13.2.3. Although not within the Green Belt, the site falls within the ‘Rural Surrounds of Horley’ and both are considered in the same manner in the Addendum report. It describes the new boundaries that would be formed by the development of site NWH2 as being “*STRONG: River, dense tree belt (northwest), car park boundary and moderate tree belt (northeast)*” and identifies that no mitigation actions are required. The accompanying plan indicates that the final site boundary was being considered within the Addendum report.

Development Management Plan Regulation 19 Consultation (January 2018)

- 13.2.4. The site is described as “*an area of open land which is used informally for access to the countryside and amenity*” and “*adjacent to the A23 to the east and largely enveloped within existing residential neighbourhoods to the west*”. Required design and mitigation measures identified by policy NWH2 include:
- “*Deliver biodiversity and green infrastructure enhancements ...*”
 - “*Protection and enhancement of trees, particularly those which are protected and/or on the site boundaries*”
- 13.2.5. The evidence base for this draft of the DMP includes an updated Green Belt Review (October 2017). Although the site is not within Green Belt the document considers the site as part of the Rural Surrounds of Horley and takes account of the final site boundary.
- 13.2.6. The Sustainability Appraisal (October 2017), which provides part of the evidence base for the Reg. 19 DMP, rates the development of site NWH2 as ‘expected to have a neutral impact’ on achieving the sustainability objective of protecting or enhancing landscape character, describing the site as being “*in a tightly contained plot which is adjacent to existing development on three sides*” – although half of the fourth side is also enclosed by development with the remaining section enclosed by trees.

Landscape character

- 13.2.7. The Surrey Landscape Character Assessment (2015) identifies the site as being located within character area WF2 Flanchford to Horley Low Weald Farmland. The site however, is not typical of that wider countryside, as it is a relatively small area of informal amenity land almost entirely enclosed by existing development.
- 13.2.8. The character assessment provides extensive recommendations for the protection and enhancement of character. Recommendations which are particularly pertinent to the potential landscape and visual impacts of the proposed SUE are:
- “*Conserve and enhance the landscape setting to villages and edge of settlement.*”

- *Any new development should conserve the enclosure and vegetated character of the surrounding landscape.”*

13.2.9. The Borough-Wide Landscape and Townscape Character Assessment (2008) identifies the urban area adjacent to the site as being ‘1980-90’s Suburbia’ and the A23 to the north of the site as a ‘key gateway’ where it enters the town.

Landscape value

13.2.10. The site lies outside of both the AONB and AGLV designations and more than 2km from the closest part of both designations. It is outside of both the ‘Recommended Additional Areas of Surrey Hills AONB’ and the ‘Secondary Potential Additional Areas of Surrey Hills AONB’ identified by the 2013 AONB Boundary review study.

13.3. Site observations and appraisal

13.3.1. The site consists of an enclosed area of informal amenity land largely surrounded by development. Development of the site would have negligible effects on the wider landscape or views as there are no views into the site which would not already feature more nearby built form and/or significant screening of the development. Retention and strengthening of the tree cover around the boundaries of the site will maintain the tree-lined frontage onto the A23 and maintain the vegetated character of the countryside to the north of Horley. Positive treatment of the public footpath which traverses the site and its connection into the public open space to the west provides an opportunity to enhance the landscape setting of the settlement edge.

13.4. Conclusion

13.4.1. The appraisal above corroborates the findings of the various supporting studies which led to the identification of the site as an SUE. The requirements for retention and strengthening of tree cover; and improvements to the landscape setting of the settlement edge are useful measures to be carried through to both the consenting process and subsequent detailed matters or modifications – as these requirements will retain key aspects of the amenity the site currently provides.

14.0 SEH4: Land off The Close and Haroldsea Drive, Horley

Site Description

- 14.1.1. The site comprises an area occupied by stables, paddocks and a riding school along with a plant hire yard. The policy proposes approximately 40 new homes.

14.2. Desk Study

Sustainable Urban Extensions: Broad Geographic Locations Technical Report (November 2012)

- 14.2.1. As noted at section 2.1 above, the site forms part of Area P within this study. The area is noted as not being subject to any landscape designations (either AONB or AGLV) although the southern part of the area lies within the 'Gatwick Open Setting'. It is identified as having "*generally unified*" character and some variety where it meets the urban fringe, resulting in an overall medium to high sensitivity to change. However, the area to the south of Horley, containing the site, was specifically identified as having an "*interrupted landscape*" and resulting in a low sensitivity to change.

Progression to Regulation 18 DMP

- 14.2.2. The June 2016 Green Belt Review shows the site initially considered was much larger than the proposed SUE. This was revised prior to the Regulation 18 DMP to take in just those areas surrounding the riding school, which included the site as part of a larger SEH4.

Sustainable Urban Extensions: (Stage 2) Site Specific Technical Report Boundary Strength Addendum (October 2017)

- 14.2.3. Although not within the Green Belt, the site falls within the 'Rural Surrounds of Horley' and both are considered in the same manner in the Addendum report. It describes the new boundaries that would be formed by the development of site SEH4 as being "*MODERATE: tree belt of varying density and residential curtilages (all sides)*" and identifies "*Additional tree or hedgerow planting along the boundary; consideration of existing trees for TPOs*" as potential mitigation actions. The accompanying plan indicates that a larger site boundary than the final SUE site boundary was being considered within the Addendum report.

Development Management Plan Regulation 19 Consultation (January 2018)

14.2.4. The site is noted as being on the south eastern edge of Horley with an existing residential cul-de-sac and new housing development at Inholms adjoining it to the west. Required design and mitigation measures identified by policy SEH4 include:

“Deliver biodiversity and green infrastructure enhancements...

Additional tree or hedgerow planting along the southern and eastern boundaries...”

14.2.5. The evidence base for this draft of the DMP includes an updated Green Belt Review (October 2017). Although the site is not within Green Belt the document considers the site as part of the Rural Surrounds of Horley.

14.2.6. The Sustainability Appraisal (October 2017), which provides part of the evidence base for the Reg. 19 DMP, rates the development of site NWH2 as ‘expected to have a negative impact’ on achieving the sustainability objective of protecting or enhancing landscape character, noting that *“The southern part of the site is located within the Gatwick Open Setting. Consequently, development on this site would have some impact on landscape character”*.

Landscape character

14.2.7. The Surrey Landscape Character Assessment (2015) identifies the site as being located on the western edge of character area WF3 Horley to Swaynesland Low Weald Farmland. The site however, is not typical of that wider countryside, as it is a relatively small area of land in use as a riding school and yard adjoined by existing development at the urban fringe.

14.2.8. The character assessment provides extensive recommendations for the protection and enhancement of character. Recommendations which are particularly pertinent to the potential landscape and visual impacts of the proposed SUE are:

- *Conserve and enhance the landscape setting to villages and edge of settlement.*
- *Any new development should conserve the enclosure and vegetated character of the surrounding landscape.*

- 14.2.9. The Borough-Wide Landscape and Townscape Character Assessment (2008) identifies the urban area adjacent to the site as being ‘1930-1950’s Suburbia’.

Landscape value

- 14.2.10. The site lies outside of both the AONB and AGLV designations and is more than 2km from the closest part of any of these. It is outside of both the ‘Recommended Additional Areas of Surrey Hills AONB’ and the ‘Secondary Potential Additional Areas of Surrey Hills AONB’ identified by the 2013 AONB Boundary review study. The land immediately to the south is within the Gatwick Open Setting, which is a land use policy similar in nature to the ‘Rural Surrounds of Horley’ rather than a landscape policy intended to maintain landscape character or valued landscape qualities.

14.3. Site observations and appraisal

- 14.3.1. The site consists of a number of small fields at the urban edge with existing buildings within and around the site. Development of the site would have negligible effects on the wider landscape or views as there are no views into the site which would not already feature more nearby built form and/or the adjacent motorway. The site is also screened by trees along field boundaries. Retention and strengthening of the tree cover around the boundaries of the site would increase this screening.

14.4. Conclusion

- 14.4.1. The appraisal above corroborates the findings of the various supporting studies which led to the identification of the site as an SUE. The requirement for retention and strengthening of tree cover is a useful measure to be carried through to both the consenting process and subsequent detailed matters or modifications in order to mitigate against the limited adverse impacts that may otherwise arise.

Appendices

Appendix 1 - Surrey Hills AONB ‘Statement of Significance’ (from website 13/8/2018)

“The Surrey Hills AONB is one of England’s finest landscapes, equivalent in beauty to a National Park and designated an Area of Outstanding Natural Beauty in 1958. Its landscape mosaic of farmland, woodland, heaths, downs and commons has inspired some of the country’s greatest artists, writers and architects over the centuries. The Surrey Hills attract millions of visitors every year who contribute to the economy of the area in sectors as diverse as wine production and wood fuel. The Hills are protected as part of London’s Metropolitan Green Belt and provide an outstanding natural resource for London and Surrey residents to enjoy outdoor pursuits, taste local food and explore market towns and picture postcard perfect villages.”

Hills and Views: Visitors to the Surrey Hills can enjoy a remarkable range of changing scenery and diversity of landscape through the panoramic views obtained from the many vantage points spread throughout the AONB. The best known include Gravelly Hill, Colley Hill, Box Hill, Merrow Downs, Leith Hill and The Devil’s Punch Bowl. There are numerous other locations along the North Downs and Greensand Hills that afford a view over surrounding countryside. The view from Newlands Corner is possibly the best in Southern England overlooking the delightful Tillingbourne Valley and St Martha’s Church on its sandy ridge. On a clear day it is claimed that 13 counties can be seen from Leith Hill, which at 290m is the highest point in South East England.

Woodland: Woods have a big impact on the Surrey Hills landscape. Woodlands are equally important for the people that live and work in and around them and to the wildlife they support. Well-managed woodlands can produce a mosaic of habitats capable of supporting light demanding and shade tolerant species. In fact it is this management of light which help to determine the abundance, or otherwise, of a wide variety of species. Management is particularly needed where a long history of rotational coppicing has suddenly stopped. The Surrey Hills has over four and a half thousand hectares of ancient woodland, which is an irreplaceable resource, which once lost, can never be restored.

(Note: No ‘statement of significance’ is provided for woodland, but the website refers to a separate page about woodland, which includes the above text).

Heathland: Heathland is a significant component in the Surrey Hills landscape, covering some 18% of the AONB as heaths and commons. Extensive areas of heathland occur in south west Surrey at

Thursley, Frensham and Hindhead, and unusually at Headley on acid soil overlying chalk. Heathland also survives in numerous small pockets, as at the Hurtwood, Leith Hill, Blackheath and Crooksbury. These heathlands represent one of Europe's most important and threatened habitats which is reflected in the designation of Thursley as a National Nature Reserve.

Commons are familiar features throughout the Surrey Hills. They include vast open tracts of heathy common at Thursley, Puttenham and Frensham, and wooded commons at Ranmore, Hurtwood, Ockley and Witley. Traditional village greens have usually evolved from common land. Many commons particularly those with views, such as Ranmore, are popular visitor destinations.

Chalk grassland is an internationally important habitat and is identified as a priority in the UK Biodiversity Action Plan. Only 1% of the Surrey Hills has remnant chalk grassland cover. These chalk grasslands support a diversity of flora and fauna, including wild flowers, herbs and mosses, together with a myriad of associated insects, particularly butterflies. At White Downs and Box Hill there are wonderful examples of chalk grassland managed by the National Trust.

Rivers and Ponds: The Surrey Hills boasts a rich diversity of natural and man made features associated with water, including springs, ponds, canals and wooded ghylls. Most are quite small, although larger ponds such as Frensham and Silent Pool are prominent features and visitor attractions. Ponds have featured in the landscape for centuries, often created to satisfy the needs of industry (mill ponds and hammer ponds such as Thursley), agriculture (field ponds), sport (duck decoys), and to act as a focus for communities (village ponds). There are also lots of ponds that can be seen on heathlands and commons derived from bomb craters and from mineral extraction.

Farmland: The Surrey Hills landscape is made up of a patchwork of different character areas each one distinctive with its own identity and set of features. Farming has played a central role in shaping this landscape, although only 40% of the Surrey Hills is designated as agricultural land. Traditional mixed farming creates a beautiful and forever changing landscape. The seasonal cycle of ploughing, drilling seeds and harvesting provides a valuable habitat for many species of farmland birds like the peewit, skylark and barn owl.

Boundary Features: Farm boundaries, principally shaws and hedgerows, some of which have considerable antiquity and historical interest, are important features in the Surrey Hills. They provide

wildlife corridors and have considerable influence on the pattern, scale and character of the landscape. Their protection and management is key to sustaining the diversity and distinctiveness of the AONB.

Parkland and Historic Features: Historic landscape features are found throughout the Surrey Hills and, together with landscaped parks, create distinctive local landscapes. Parkland contributes significantly to the landscape character of the Surrey Hills, as with the Wotton and Albury Estates, and as much as 6% of the AONB is registered as parkland.

Country Lanes and Rights of Way: The Surrey Hills has numerous attractive, winding, often enclosed, country lanes. A large number are 'sunken' lanes, particularly in the Greensand. Sunken lanes are often former drove ways, formed by erosion of sand and chalk. They have characteristically high banks with tree cover, and some, with their emergent tree roots, are spectacular features. Roads, bridleways and footpaths can be as much a part of the landscape as hedges and fields. The Surrey Hills enjoys an extensive network of footpaths and bridleways, including the North Downs Way National Trail, the Greensand Way and the Downs Link, which provide ready access throughout the AONB.

Settlements and Built Heritage: The Surrey Hills has a rich and diverse built heritage featuring many small farmsteads, pleasant hamlets with village greens, and grand houses set in parkland. Local materials like stone, flint, tile, brick and timber are featured throughout the Surrey Hills defining the sense of place. Many villages are picturesque and many feature 'Surrey Style' architecture, inspired by Lutyens and the Arts and Crafts Movement, whose designs sought to reflect local vernacular traditions. Many villages evolved around village greens creating picturesque scenes and are often designated as Conservation Areas.

Tranquillity and Inspiration: The Surrey Hills is greatly valued for its scenic beauty and provides a wonderful inspiration. It is a resource for historical, cultural, ecological, archaeological and literary interest. The area has influenced some of the country's finest writers, poets, artists and musicians. That inspiration continues today with millions of visitors attracted to its beauty spots and viewpoints to seek recreation and relaxation. The area's abundance of natural features, local landmarks, attractive villages and breathtaking views means the Surrey Hills is valued as an area that is pleasant to live, work and visit. Many areas of the Surrey Hills still retain a feeling of remoteness, isolation and tranquillity, including dark skies at night."

Appendix 2 - Figures