



Landscape Proof of Evidence

Part 2 of 3 Parts

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on behalf of the appellant

Pins ref: APP/R3650/W/23/3327643

LPA ref: WA/2022/01887

Date:
December 2023

Hybrid application consisting of an Outline application (all matters reserved except access) for up to 110 residential dwellings accessed from the proposed access road (linking to Midhurst Road), associated landscaping, restricted access for emergency access, community growing space and associated infrastructure, including green infrastructure. Full application for the erection of 1 dwelling and associated works; a junction alteration from Midhurst Road, associated access road to serve the development (including the diversion of a public footpath), car park, associated landscaping and drainage; the erection of a scout facility/nursery (use class F) and an education facility (use class F); a Suitable Alternative Natural Greenspace (SANG).

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PART 3: Appendices

Appendix 1: Methodology.

Appendix 2: Summary of Landscape and Visual effects (ES extract).

Appendix 3: Plans identifying tree loss and retention.

Appendix 4: Accurate Verifiable Photomontages.

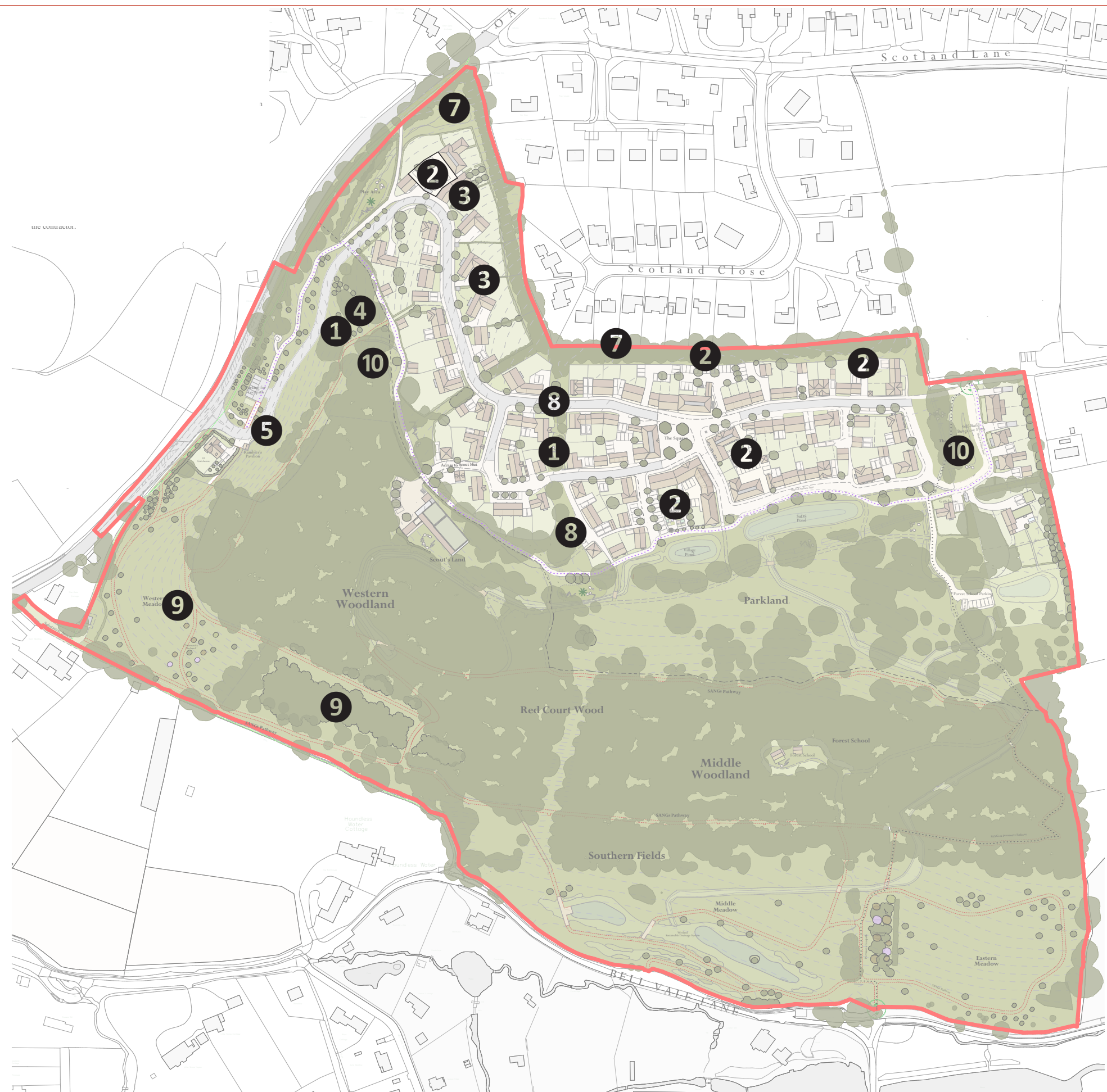
Figure 14: Changes made to the block plan during planning

3.1 ILLUSTRATIVE MASTERPLAN

The following pages provide an annotated masterplan plan showing the refinements and responses resolving WBC's concerns.

- ① Reduced development and removal of homes where it impacts on the existing hedge and trees. This increases the total open space and reduces the development area. Additional reduction with the removal of the Park Lodge on the western edge of the site.
- ② Parking Courts and block of Flats area refined and adapted. Permeable paving below parking courts and potager garden.
- ③ Section and elevation provided to show design intent and buffering with Scotlands Close and the design of the entrance courtyard building.
- ④ Removal of the lodge to reduce development and hardstanding in the western approach
- ⑤ Reduced impact of retaining entrance wall by an overall height reduction of 500mm. Material changes to the wall to bargate stone in keeping with the surroundings of the Surrey area. Adding the ramblers pavilion and gateway to the National Park/SANG adds a use and interest to the wall. In addition, the wall is planted to soften its impact further.
- ⑥ Drainage approach improved to increase the length of SANG swales following comments from LLFA
- ⑦ A +10m Buffer of planting is reserved through management. Tree planting was carried out in 2007, so the buffer has reached a level of maturity and is established.
- ⑧ An widened provision for an additional wildlife corridor, play provision buildings front upon the area.
- ⑨ Creation and addition of multiple swales following review of the blue infrastructure strategy.
- ⑩ New provision of greenway along the southern edge of the new cycleway in line with stainability SPG and Surrey County Highways.

Extract from the Design Report Addendum to the DAS
(Adam Architecture)



Revised site layout presented 26 January 2023

Change in character resulting from the change of three grass fields to a residential area

3.26. The construction of housing on green fields will inevitably have a direct adverse effect on the landscape character of the fields in which it is situated, it is an effect associated with the development of housing within green field sites across the country. It will result in a loss of rural character and openness within the three fields immediately adjacent to Scotlands Close. It is my opinion that the sensitivity of the northern fields is Medium while the change from pasture to a residential area will result in a High magnitude of change, resulting in a Moderate to Large adverse effect on their landscape character. A significant effect, an effect which is considered to be an important consideration material in the decision-making process.

3.27. These fields are, however, of similar character to the field on the east side of Scotlands Close, comprising grassland afforded substantial enclosure by housing and existing mature trees. The Inspector for Appeal Ref: APP/R3650/W/21/3280136, Land off Scotland Lane, Haslemere (**Core Document 9.1**), Helen B Hockenhull BA (Hons) B. PI MRTPI, states in paras 17 and 18 that:

“17....I agree with the main parties that the landscape condition is medium. Turning to scenic quality, this is a term used to describe landscapes that appeal to the senses, primarily the visual senses. The site is well contained with views limited to close range locations. It does not therefore in my view satisfy this criterion.

18. In terms of rarity, whilst I accept that the site is characteristic of the Hindhead Wooded Greensand Hills LCA, which itself is limited in extent, enclosing the town of Haslemere, there is no evidence before me to suggest the site contains any individual features or elements that are rare. With regard to representativeness, whilst the site is representative of the LCA, I have not been advised of any particular character and /or feature of elements which are considered particularly important examples. Accordingly, this criterion is not satisfied”.

3.28. In para 21 the Inspector states:

“With regard to perceptual aspects, all parties agree the site is not ‘wild’. I have no reason to disagree. In terms of tranquillity, the site is adjacent to the urban edge with residential development affecting the sense of tranquillity. Towards the southern boundaries of the site, at a greater distance from existing built form, a higher level of tranquillity is experienced. This is however typical of any site in this context and does not elevate the site to a valued landscape”.

3.29. The Inspector concludes in Para 45 that:

“I consider that the proposed development would have a major adverse impact on the character of the site. Due to the lack of intervisibility and the fact that the site is visibly well contained, this impact would be localised, however, it would still fail to recognise the intrinsic character and beauty of the countryside and protect the character and qualities of the AGLV”.

3.30. In my view the impact of the Appeal Proposal on the character of the fields will be the same as the effect of Phase 1 on the field to the east of Scotlands Close, if judged solely on landscape assessment grounds. The key difference, which must be recognised, is that in terms of policy, this appeal site lies within the AONB, not the AGLV and great weight must be attributed to any harms.

3.31. It is also the case that settlements are a feature of AONB and well-designed buildings can contribute to the character and quality of an AONB. This design seeks to deliver a built environment which contributes positively to the local character of the AONB. The existing dwellings within Scotlands Close are late 20th Century and do not exhibit the urban layout or features typically associated with the types of buildings that contribute positively to the AONB. The Appeal Proposal will act as a buffer to this less sympathetic urban edge. The Appeal Proposal will be an extension of the architectural design style, quality, and character of the consented Phase 1.

3.32. Regarding the visual amenity of residents of Scotlands Close, these properties afford restricted views from gardens and ground floors, but clearer views of the proposed main residential area from upper floors until the intervening tree planting has established. Even then, views will be filtered in winter. Initially there will be a large adverse effect. Mitigation has already been undertaken in the form of advanced tree planting, and additional tree planting proposed in back gardens of new properties. It is recommended that the proposed rear parking courts close to the boundary are screened with 1.8 m high close boarded fencing. The residual effect will be Moderate adverse in winter, Slight adverse in summer. There will be no views of the appeal Proposal from the public highway at Scotlands Close, or from dwellings north of it.

3.33. The architects have ensured that the separation distance between existing and proposed properties exceeds the twenty-one metres required by the Neighbourhood Design Guide. The architects have illustrated this within the Design and Access Addendum, the relevant page is presented as **Figure 15**. This relationship is similar to that in Phase 1 which the Inspector considered to be acceptable, stating in Paras 117 and 118:

117. “The Council’s Residential Extensions Supplementary Planning Guidance advises that a distance of at least 21 metres between proposed windows and neighbouring property windows should be achieved. This interface is significantly exceeded. This document does not however provide guidance where there is a level difference between the dwellings on the site and the adjacent properties, in this case a difference of approximately 4 metres.

118. I take account of the separation distances between dwellings, the level differences, the single storey nature of part of Plot 21 and Plots 18 and 19, as well as the proposed boundary planting and screening. I am satisfied that the proposal would not give rise to unacceptable loss of privacy or overlooking”.

3.34. The proposed dwellings in the main residential area will lie on the ridge but will be screened from the remainder of the AONB and SDNP by existing mature woodland. The woodland will be included within the development and will be within the landholdings for the Public Open Space (POS), the local Scouts group and Forest School. The woodland and remaining areas offered as a SANG will be subject to a

3.9 BOUNDARY WITH SCOTLANDS CLOSE

Query: To prevent merging developments there should be a greater green buffer separating the existing Scotlands Close residential area. Currently the rear gardens of the new proposal (north boundary) would not be sufficient to prevent future loss of any tree planting proposal at this location for example because of impact by future residents wishing to expand and maximise their allotted garden space to reduce shade, leaf nuisance and impact of trees upon new outbuildings (Permitted development rights).

Response: A tree and hedge buffer of a minimum depth of 10 metres wide were planted between the site, and Scotlands Close creates an enclosure and offers to screen for existing residences on the Close. Additionally, the proposed buildings are strategically placed to separate the existing Scotlands Close buildings. As the Neighbourhood Design Guide requires an overlooking distance between homes that exceeds 21m, the separation between Scotlands Close and the proposed buildings far exceeds this distance, as shown in the diagram opposite. Furthermore, the separation distances are more generous than the relationships with Scotlands Close accepted under the Phase I appeal, following close scrutiny on site.



Plan showing separation distances with existing properties in Scotlands Close



site wide management plan which will also ensure that the Biodiversity Net Gain (BNG) target is met, and the woodland protected in perpetuity with its screening function retained and enhanced.

Harms associated with the proposed access from the Midhurst Road (A286)

- 3.35. Vehicle access into the Appeal Site from Phase 1 is not possible due to traffic capacity issues associated with the use of Scotland Lane. It is necessary to construct a vehicle access into the Site from the Midhurst Road, which lies within the AONB (pedestrians and cyclists will also be able to access to the Appeal Proposal from the east through Phase 1). All other options have been explored but access from the Midhurst Road is the only practical option.
- 3.36. Detailed design work has been undertaken to ensure that the access road will meet current highway standards and to gain an accurate understanding of the maximum likely landscape and visual impacts resulting from the engineering and highway architecture required.
- 3.37. This detailed work has determined that two areas of compliance with highway requirements will – prior to mitigation – unavoidably result in significant landscape and visual impacts on the AONB. First, to achieve a right-hand turn lane and the correct sight lines at the junction, a significant section of hedgerow and trees will need to be removed along part of the Site boundary with the Midhurst Road. This loss will be a direct impact on the fabric of the landscape, its character and the visual amenity of road users.
- 3.38. Secondly, the route up the hillside has been designed to have the least adverse landscape and visual impacts that will arise from the earthworks and engineering while achieving highway compliant gradients and geometry. The road will not be lit by streetlamps. Nevertheless, the construction of the access will result in a substantial adverse localised change to the landform of the field and its character without mitigation. The sensitivity of this field is High and the magnitude of change High resulting in a large change to its landscape character. Not all aspects of the change will be detrimental to the character of the AONB since the design seeks to establish a high-quality country estate type entrance which is in keeping with AONB character. Thus, the effect on the landscape character of the field is neither large adverse nor large beneficial, but somewhere in between. The design has been undertaken in full awareness that under Para 176 of the NPPF:

"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues "

- 3.39. Turning to the effects to the Midhurst Road, the WBC Statement of Case, para 18 states:

"The proposed access onto Midhurst Road would necessitate the widening of part of the road open up views into site and the loss of boundary trees and vegetation and result in increase in number of traffic movements. The significant engineering works, tree loss and vehicle movements would undermine the narrow tree lined character of

this route would be lost which would significantly undermine the rural character of this length of the narrow main road which represents the transition from town to countryside, detrimental to the Surrey Hills AONB and the setting of the South Downs National Park".

- 3.40. The effect of the proposed access on the setting of the SDNP is also raised by the SDNP in its objections. The primary impact arises from the need to widen a sixty-metre-long section of the carriageway by three metres to insert a right-hand turn lane line at the entrance and create the bell mouth into the site. The west side of the carriageway will remain the same and the continuous tree line on the west side of the lane will be unaffected. The widening will take place to the east, taking Appeal Site land. Either side of the three-metre widened section the widening tapers back to the existing road width over a distance of seventy metres north and seventy metres to the south. This equates to two hundred metres of the carriageway being widened between three and less metres. The widening results in the loss of trees along one hundred and eighty metres of road (since the outer limits of the tapers can be accommodated within the existing highway edge). It is accepted that tree loss is undesirable. For clarity the trees that need to be removed to create the access are listed below with notes on their condition, trunk diameter, structural condition and category. This information has been taken from the Arboricultural Development Statement February 2023 by CBA Trees (**Core document 1.39**), which also provides more in-depth metrics on each tree. Plans showing tree lose and retention for the whole site are presented in **Appendix 3**. The arboricultural report identifies each tree by number and categorises them as U, A, B or C.
- 3.41. Category U trees are trees in such a condition that they cannot realistically be retained as living trees in the context of the current land use for longer than 10 years. One such tree would need to be removed to create the access.
- 3.42. Category A trees are trees of high quality with an estimated remaining life expectancy of at least 40 years. No Category A trees would need to be removed to create the access.
- 3.43. Category B trees are trees of moderate quality with an estimated remaining life expectancy of at least 20 years. Four such trees would need to be removed to create the access.
- 3.44. Category C trees of low quality with an estimated remaining life expectancy of at least 10 years, or young trees with a stem diameter below 150mm. Eleven such trees would need to be removed to create the access.
- 3.45. The suffix 1 indicates that a trees category is mainly for its arboricultural value, while 2 indicates it is mainly for its landscape value, 1+2 indicates that it has both arboricultural and landscape value.

Group 102 Category C1+2 Common Beech

Structural Condition: Fair

Stem diameter: 790mm

Growing on bank Bifurcated at 2m above ground level. Main trunk divides again at 8m above ground level. Crown shape distorted due to group pressure. Major deadwood in crown Old pruning wounds.

103 category U Common Beech

Structural Condition – Fair

Stem diameter: 1250mm

Growing on bank Ivy on trunk and in crown Multi-stemmed at 3m above ground level

Tight fork with included bark Major deadwood in crown Roadside tree Desiccated fungal fruiting body at base on north and west sides, most likely *Meripilus*

104 Category C1 Common Beech

Structural Condition – Fair

Stem diameter: 220mm

Bifurcated at ground level. Growing on bank. Ivy on trunk and in crown. Major deadwood in crown. Crown shape distorted due to group pressure. Roadside tree. Squirrel damage in crown

105 Category C1+2 Norway Maple

Stem diameter: 360mm

Structural Condition – Fair

Growing on bank. Ivy on trunk and in crown. Crown shape distorted due to group pressure. Minor deadwood in crown. Bifurcated at 4m above ground level. Roadside tree

106 Category C Norway Maple

Structural Condition – Fair

Stem diameter: 590mm

Growing on bank. Ivy on trunk and in crown. Bifurcated at 1.8m above ground level. Tight fork with included bark. Roadside tree. Squirrel damage in crown. Leans and weighted east

108 Category C1+2 Common Beech

Structural Condition – Fair

Stem diameter: 380mm

Growing on bank. Trifurcated at 1m above. ground level. Epicormics on trunk and in crown. Crown shape distorted due to group pressure. Roadside tree. Squirrel damage in crown. Weighted east

109 Category B1+2 Common Beech

Structural Condition – Fair

Stem diameter: 480mm

Growing on bank. Epicormics on trunk and in crown. Bifurcated at 6m above ground level. Roadside tree.

110 Category C1+2 Common Ash

Structural Condition – Fair

Stem diameter: 90mm

Growing on bank. Trifurcated at ground level Roadside tree. Previously topped as part of hedgerow

111 Category C1 Common Ash

Structural Condition – Fair

Stem diameter: 160mm

Bifurcated at ground level Developing tree. Low hanging branches. Natural regeneration

Group 101 comprising beech and oak with hazel and holly understorey in places

Structural Condition - Fair

Crown shapes distorted due to group pressure Epicormics on trunks and in crowns. Large buttress roots. Ivy on trunks and in crowns Basal suckers. Major deadwood in crowns. Low hanging branches. Old pruning wounds. Trunk shapes distorted due to group pressure. Trees growing along roadside. Of the 57 trees in this group only the following will need to be felled:

101. 1 Category C1+2 **Common Beech**
Stem diameter: 970mm

101.2 Category B1+2 **Common Beech**
Stem diameter: 850mm

101.3 Category C1 **Common Beech**
Stem diameter: 320mm

101.4 Category B1+2 **Common Beech**
Stem diameter: 730mm

101.5 Category C1+2 **Common Beech**
Stem diameter: 630mm

101.6 Category C2+1 **Pedunculate Oak**
Stem diameter: 640mm

101.12 Category B1+2 **Common Beech**
Stem diameter: 720mm

G102 Holly and Hazel Category C1+2

Structural Condition – Fair

Stem diameter: 20mm

Minor deadwood in crowns. Low hanging branches. Multi stemmed at ground level. Basal suckers. Linear group growing on bank. Road to west. Informal public footpath to east.

3.46. As well as the physical loss of the trees as landscape features the widening will result in some weakening of the narrow and enclosed green character of the road due to tree loss and a wider carriageway. It will open views of the Appeal Site, which I perceive as not necessarily being detrimental since the tree loss will result in an attractive view across the Appeal Site to Red Court Woods and the wooded hillsides of the SDNP beyond. Some trees will also be retained behind some of the trees to be lost, which will retain some enclosure to the Midhurst Road.

3.47. I accept that the localised increase in the width of the A286 Midhurst Road, the bell mouth and additional white lining will weaken the narrow-enclosed character of the road. However, road users will perceive this in context with the character of nearby

stretches of the A286. The road is frequently wider and central white lining is commonplace along the route to Kingsley Green to the south. The proposed bell mouth is of a similar size to the Bell Vale Lane junction, which lies five hundred metres further south down the A286. These features of the A286 are illustrated in **Figure 16**. The Bell Vale Lane junction has a more flared geometry, the give way lines across its bell mouth are thirty-two metres long while those on the proposed Appeal Site access are twenty-five metres long. In my opinion the Bell Vale Lane junction is not a particularly intrusive feature.

3.48. The visual effects to users of the Midhurst Road arising from the construction of the access road prior to mitigation will vary from Very Large adverse on passing the bell mouth but will decline to Moderate adverse as drivers move away from it. As the proposed roadside planting establishes the effect will decline to Slight adverse as drivers' approach but remain Very large on passing the junction. The junction and lodge have been designed to form a feature characteristic of the AONB and SDNP and so once established the perception of the new landscape will not necessarily be perceived as adverse. A similar range of visual effects will be perceived by users of Public Right of Way CP597.

3.49. The Appeal Proposal will result in some other less significant adverse effects (as determined by the Landscape and Visual Impact Assessment within the ES) and for transparency these are summarised in Table A within the **Appendix 2**.

3: PROPOSED MITIGATION FOR ADVERSE LANDSCAPE AND VISUAL EFFECTS

3.50. There is no practical way the change in character of the fields to urban development can be mitigated, other than delivering a high quality of urban design appropriate for an AONB landscape. In my opinion the quantum of development is appropriate for the reasons stated earlier.

3.51. The Appeal Proposal incorporates the following measures to mitigate the adverse landscape and visual effects arising from the Midhurst Road access.

3.52. A hedgebank with trees will be re-established to the back of the new sight line and planted with wildflowers. This, with the diverted footpath, will restore the boundary feature along the Midhurst Road. This will partly be achieved through planting of more mature stock, and in some areas, planting in advance of the tree felling and construction process, where ground levels will not be affected by the works. The advanced planting is identified by green rings around the tree symbols on **Figure 18** the landscape plan for the Midhurst Road area SL202_LX_GA_0_01.

3.53. The access will turn north on entering the Site and so only a short section will be visible to travellers moving along the Midhurst Road. It will have the character of an entrance to a country lane or estate driveway.

3.54. The ground levels will be sculptured along the boundary with the Midhurst Road so that the new access road lies lower than the line of sight of users of the Midhurst Road. Substantial tree planting will be undertaken between the two, reinforcing the tree fringed character of the Midhurst Road and accord with the character of the AONB and avoid adverse effects on the setting to the South Downs National Park.

3.55. No residential development is proposed in the Midhurst Road access field, apart from a dwelling designed to be perceived as a traditional lodge or gatehouse to confer the character of the entrance into a country estate where the main house is out of view. In this case the main development area will be set behind Red Court Wood. Great attention has been paid to the design of the lodge, which is in the vernacular style, fully depicted in its detailed application drawings. **Figure 17** illustrates how its character accords with existing roadside dwellings in the locality. The full Accurate Verifiable Images are presented in **Appendix 4** and form **Core Document 2.51**. The lodge will also provide surveillance to a walker's car park which will be provided just inside the access (users of the car park will then be able to access the existing PRoW network and the SANG).

3.56. To be highway compliant the proposed access has to meet the Midhurst Road level and at a right angle, the first section on leaving the Midhurst Road runs close to existing levels, but then it cuts into the grass bank that rises up to Red Court Wood, before turning to run north up the slope, close to grade. It is necessary to build a retaining wall on the bend to avoid recontouring a greater area of hillside. This retaining wall was redesigned during the application following comments from WBC's Urban Design Officer (**Core Document 3.22**). It is now integrated into the design of the lodge and is seen as one set piece. This is achieved by using complementary materials and an integrated 'walkers' shelter'. The design officer deemed this change satisfactory.

3.57. The remaining area of the field will remain and will be subject to biodiversity enhancement to create wildflower meadows and wetland (part of the sustainable drainage system). These areas will be managed so that they can be used by walkers, scouts and those taking advantage of the SANG.

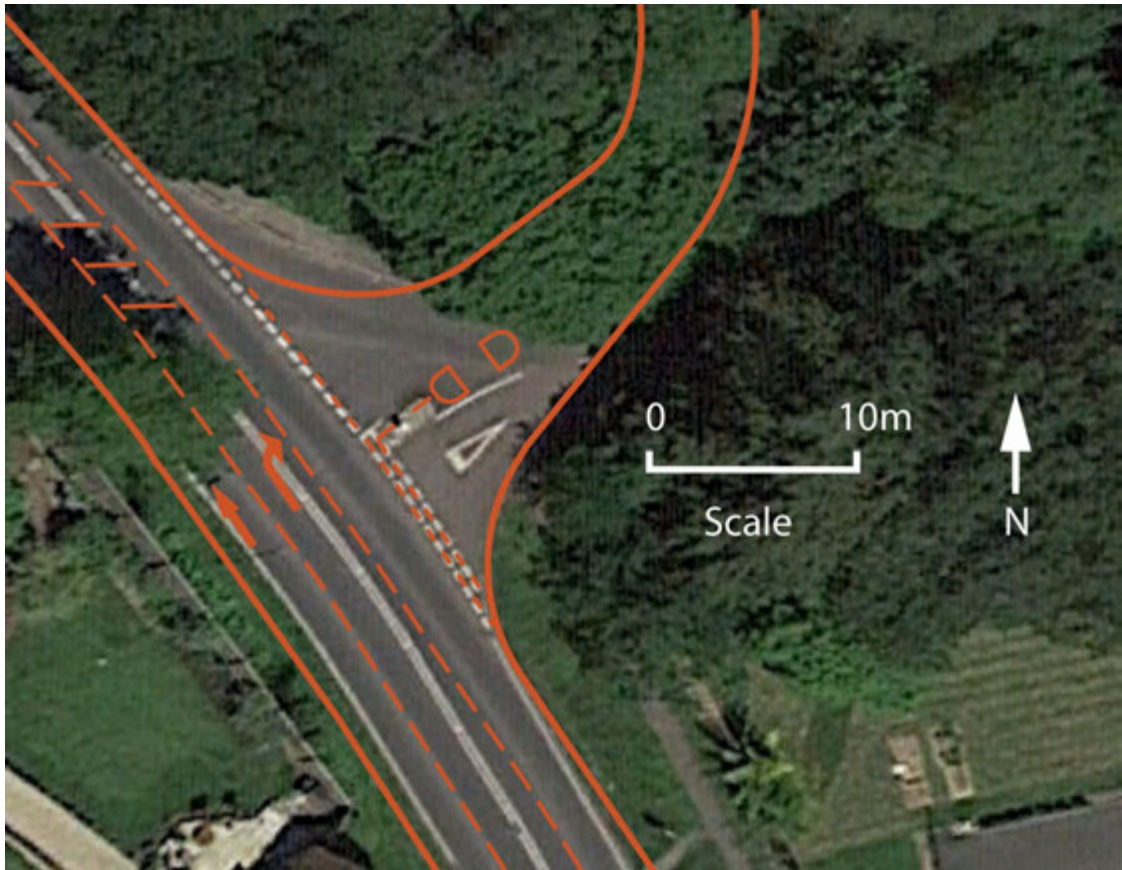
3.58. Although the Appeal Proposal will result in visual changes to the AONB and a change in landscape character the aim is to create a visual experience which is as attractive as the existing situation and a country estate landscape character which is a feature of both the AONB and SDNP, maintaining the high quality of the AONB landscape and setting to the SDNP. The consultation response received from the SDNP included the comment:

"This new road entrance onto the A286 is described as being designed to reflect the character of an entrance to a country park or estate. As with our comments above in regard to the southernmost part of the SANG land, we do not think a country park character would be characteristic for the setting of the SDNP".

3.59. Gate houses and entrance lodges are a distinguishing feature of the Surrey Hills AONB and SDNP. The most obvious example is Red Court Lodge at the entrance to Red Court but there are also gatehouses and lodges at the entrance to Blackdown Park, Lavington Park, the Welbourne Estate, Petworth and Witley Park. The proposed access lodge has been designed to be less grandiose than the lodges to the great estates and subservient to the lodge at Red Court on Scotland Lane, since there will be no actual gateway or gate pillars. The proposed lodge will mark the entrance but will have the character of a roadside cottage or lodge typical of a rear entrance to a larger estate.

Figure 16: The character of the A286 Near the Site

This figure illustrates how the extent and character of the proposed highway works to create the road access to the Appeal Proposal will be in keeping with the scale and character of existing junctions onto the A286 and its typical carriageway width.



Google Earth aerial of the Bell Vale Lane junction with the Proposed Appeal Site Junction overlain in orange for comparison.



The majority of the A286 between the Bell Vale lane junction and Kingsley Green to the south is around 7.5m wide with a central cross hatched zone.



View of the A286/ Bell Vale Lane junction looking southeast. The splay to the northwest is more elongated than that proposed for the Appeal Proposal access.



View of the A286/Bell Vale Lane junction looking northwest

Figure 17: The design of the lodge house



The gate lodge at Red Court



The north elevation of the proposed lodge
(extract from the Adam Architecture planning drawing)

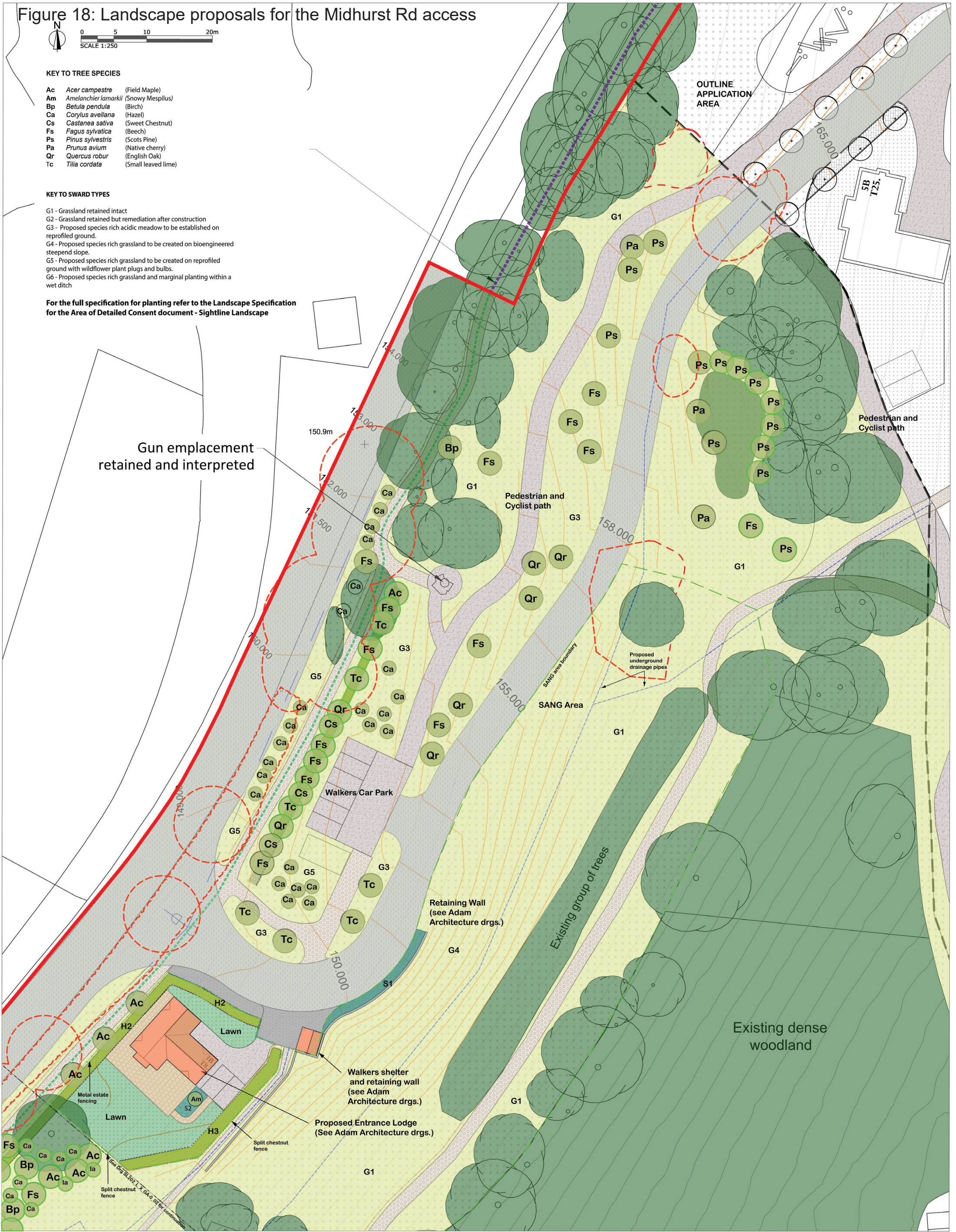
Photographs of isolated roadside vernacular buildings near the appeal site which confer a distinguishing character to the locality and illustrating how the proposed lodge will accord with and strengthen this character.

- 1. Dwelling on Tennyson Lane
- 2. Lowder Mill, Bell Vale Lane.
- 3. Dwelling on Tennyson Lane.
- 4. One of the lodges to the Witley Estate representing a more formal entrance but also characteristic of the locality.



The proposed lodge on the proposed Midhurst Road access
(extract from the Accurate Visual Representations). This south elevation illustrates how it will echo the aesthetic of the existing lodge.

Figure 18: Landscape proposals for the Midhurst Rd access



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LEGEND

Existing

- Application boundary
- Existing tree to be retained
- Existing trees/vegetation to be removed
- Existing contour line

Proposed Softworks

- New tree planting
- Meadow grassland
- Mown path/naturally worn surface
- Amenity grassland (private)
- New hedgerow
- Ornamental shrubs
- Proposed contours
- Proposed planting of trees and hedges in advance of the construction works

Proposed Hardworks

- Carriageway
- Macadam
- Gravel retained in cells (Detail D6)
- Paved surface
- Split chestnut three rail fence (Detail D6)
- Metal 5 bar estate fence finished in black (Detail D7)
- Brick faced retaining feature (see Adam Architecture drawings)

Detailed application boundary

- Visibility splays
- Diverted section of PRoW
- PRoW retained on existing alignment
- Proposed underground drainage pipe
- Boundary of the Suitable Area of Natural Greenspace (SANG)

Revision **Date** **Comment**

A	05.02.23	Cottage omitted, walkers shelter added, landscape adjusted accordingly.
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ON BEHALF

Redwood (South West) Ltd

PROJECT

Scotland Park

TITLE

Planting Plan Access Road

DATE 27th April 2022

SCALE 1 : 250 @ A1

DWG No SL202_L_X_GA_0_01_Rev A

APPROVED CMcD

- 3.60. It will echo the aesthetics of Red Court Lodge in terms of architectural design, type and use of materials etc. providing a contextual link. In this respect it will also reflect the character of many roadside vernacular buildings in the vicinity. As illustrated in **Figure 16**. Currently the proposed fencing along the altered boundary of the Midhurst Road is three bar split oak with metal estate fencing around the lodge. SDNP officers considered that the metal estate fencing is too formal at this location. If, however, the consensus is to make the dwelling appear more like a roadside cottage, then the metal estate fencing could be replaced with the split oak fencing which is proposed elsewhere along this boundary to confer rural character. A simple change that could be made via approval of the detailed landscape plans by condition.
- 3.61. To be entirely transparent about the changes to the Midhurst Road as a result of the Appeal Proposal a series of verifiable photomontages have been produced in accordance with Landscape Institute and industry guidelines. Photographs were taken when the deciduous vegetation was out of leaf, a time of year at maximum visibility. These are presented in full **Core Document 2.51** and in **Appendix 4** of this POE. The design seeks to re-establish the green enclosed nature of the road, but rather than replicate what is there exactly, establish new features which are entirely appropriate in terms of its quality, character and attractiveness for this part of the Surrey Hills AONB as it approaches the SDNP.
- 3.62. With regards to the timescale for the mitigation to be effective, I maintain the position that while the loss of tree cover along the east side of the road will reduce the green enclosed character of the lane, the more open views will not be detrimental to visual amenity. Substantial planting of semi-mature trees and shrubs is proposed to re-establish the sense of enclosure. In my opinion a sufficient sense of enclosure can be re-established within five to seven years.

4: COMPENSATION

- 3.63. In this section I describe the landscape benefits offered by the appeal proposal and within this I include recreational benefits, educational/community benefits and ecological benefits since these have a direct connection with the landscape.

Extensive Greenspace

- 3.64. As the Land Use Plan (**Figure 10**) indicates, 4.69 hectares of the Appeal Site will become a residential area (the Developed Area), while 18.53 hectares (78%) will become greenspace (the Wider Land Holding). The public will have wider access to the majority of the Wider Land Holding apart from two small areas limited to specialist groups. The extent of the proposed SANG and the interconnecting footpaths and cycleways is also depicted in **Figure 19**.

A new headquarters campus for the 1st Haslemere Scout Group set in an extensive, mature woodland.

- 3.65. The Appeal Proposal will include a new building for the local scout group set within an existing clearing within the woodland (the location and extent is shown on Figure 10). This will allow the group to vacate their current building in the town centre, removing one constraint of redeveloping that land. The building will be hidden among the trees, be highly sustainable in its design, construction and operation, with architecture to complement its natural setting, minimising wider landscape and visual

impacts. Two hectares of woodland will be allocated for the sole use and management by the scouts, providing an ideal setting and learning experience. The scout hut will be accessible from the proposed residential development. In my view it would be difficult to provide a more suitable location in terms of landscape and 'genius of place'. Photographs of the proposed location, together with illustrations as to how it will look based on the detailed design drawings are presented in **Figure 20**. The location will be substantially better than their current location and with security of tenure. The provision in terms of the quality and character of the land being offered and its wider setting is, in my opinion, exceptional. Para. 177 of the NPPF requires consideration of "recreational opportunities". The Appeal Proposal provides this.

A facility for Grayswood Nursery and Forest School

- 3.66. It is proposed that a second area within Red Court Woods becomes the permanent home for a local forest school, the location and extent of which is shown on **Figure 10**. It will comprise a simple rustic building set within an existing clearing within its own one-and-a-half-hectare parcel of woodland. As with the provision for the scouts, the provision in terms of the quality and character of the land being offered and its wider setting is, in my opinion, exceptional. The forest school is also illustrated within **Figure 20**.

Nature Reserve

- 3.67. One of the fields to the south will become a nature reserve comprising wetland, parkland, and meadows. The wetland will be part of the sustainable drainage system and SANG for the Appeal Proposal. This can become a valuable learning resource for the forest school and scouts and other community groups.

Suitable Alternative Natural Greenspace (SANG)

- 3.68. The provision of 9.69 ha of SANG within the Appeal Proposal could be used as a regional provision, enabling other development sites, restricted by the ability to provide SANG, to come forward. It would have a walking catchment of 400m and a driving catchment of 2km. Approximately 9,395 existing residential dwellings also fall within the 4km catchment, and a proportion of these existing residents would also be expected to visit the SANG in preference to the Wealden Heaths Phase II Special Protection Area on occasion. Based on the standard SANG capacity of 8 ha per 1,000 new residents, the Appeal Proposal will deliver an excess capacity of 323 dwellings once the proposed 111 dwellings are accounted for. This excess can provide SANG for all of the current urban allocations in Haslemere. SANG The field to the east of it will also become part of the SANG, the landscape design is low key with the area being designed to allow dog walkers to let their dogs off the lead.

Restoration of Red Court Woods

- 3.69. At the time the Appeal Site land was purchased by the Appellant. Red Court Woods had not been positively managed for decades. The wood retains many attractive features, such as fine trees, areas of good native ground flora, including carpets of bluebells and attractive walkways. There are, however, numerous aspects which detract from its character and quality and without positive management there will be a steady decline in the wood as a habitat and landscape feature which benefits wildlife and human wellbeing. This is illustrated within **Figure 5**. The character and quality of this part of the AONB will be increasingly adversely affected by its decline, while the Appeal Proposal will ensure its positive management and long-term future as a

Figure 19: SANG and pedestrian and cycling links (Extract from EPR letter to NE August 2023)

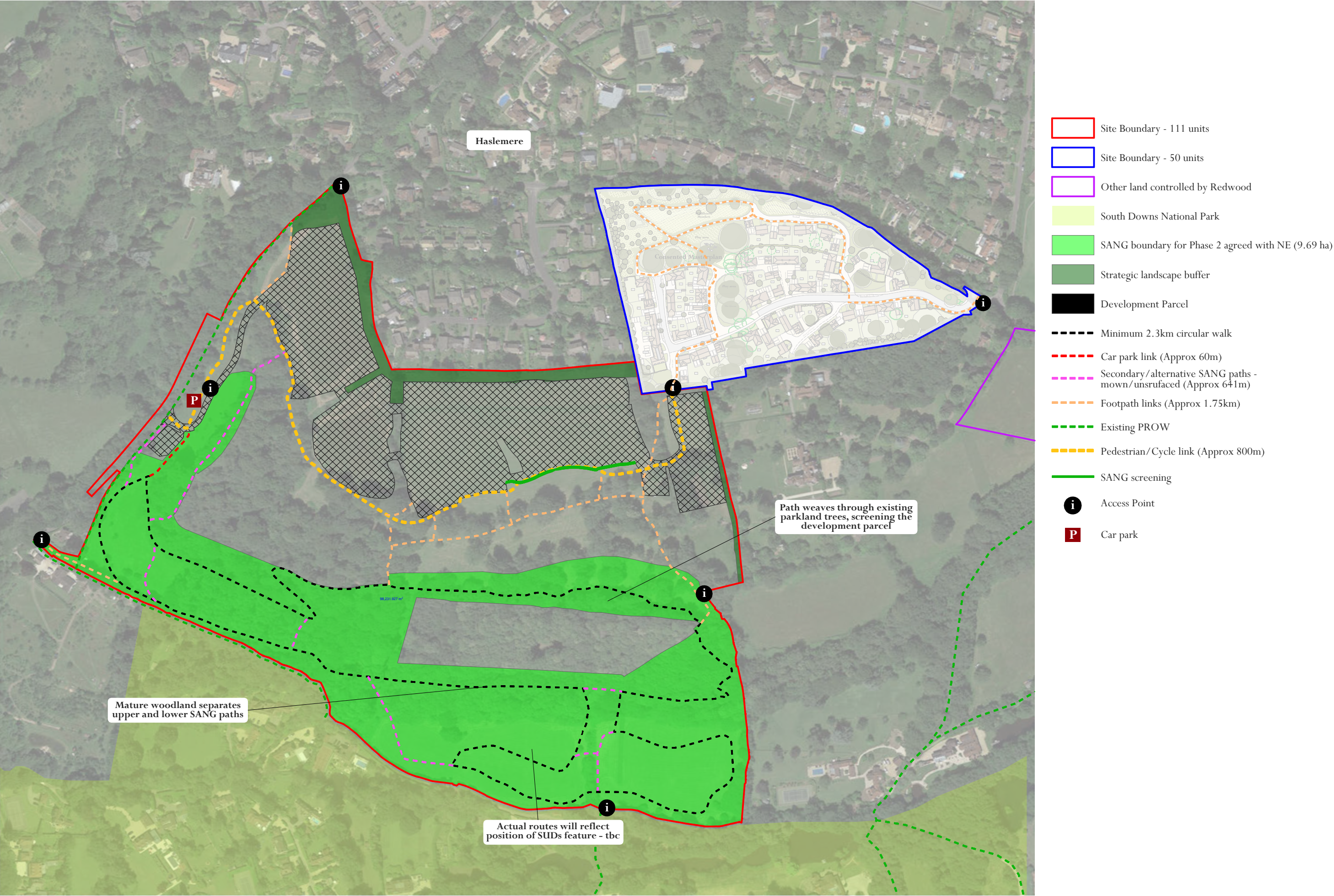


Figure 20: Illustrations of the proposed Scout and Forest School facilities



Perspective drawing of the proposed Scout Hut, viewed from the southeast
(Adam Architecture)



Perspective drawing of the proposed Forest School, viewed from the southwest
(Adam Architecture)



The proposed location of the Scout Hut from a similar viewing angle. The hut will be cut into the slope.



The proposed location of the Forest School from a similar viewing angle.

valuable element of the Surrey Hills AONB. Some of the key issues which need addressing are:

- Eradication of alien invasive features, including rhododendron, bamboo and Himalayan Balsam.
- Selective removal and coppicing of mature trees, particularly the Sweet Chestnut and some native conifers, will be undertaken on rotation in order to encourage different age classes of tree and increase the degree of light penetration to ground level, thereby promoting the development of a more diverse woodland ground flora.
- Phased removal of a compartment of non-native conifers, planted as a timber crop and now becoming over mature and replanting with native tree species.
- While dead wood at ground level is desirable, there are areas where there is too much deadwood due to tree collapse, smothering native ground flora. Selective removal to achieve the correct balance will be undertaken.
- The wood includes a substantial population of holly trees and while these are beneficial in providing a high level of winter screening it is my opinion, having been familiar with the site for over five years, that the holly is growing and spreading rapidly. The holly population should be maintained to retain its optimum screening and wildlife benefits, but its further spread should be controlled to avoid it smothering the native ground flora and prevent natural regeneration of broadleaves.
- Enhancement of habitats for bats, birds, dormice, hedgehogs, invertebrates.

3.70. These issues are illustrated in Figure 5. The scouts, forest school children and community interest groups can all be involved in this restoration and enhancement of the woodland as an educational experience and to gain a sense of achievement and wellbeing.

WWII Spigot

3.71. During the recent management of the estate a WWII Mortar gun emplacement has been discovered adjacent to the Midhurst Road (clearly designed to defend the approach to Haslemere) This will be restored with an interpretation board installed.

Walkers Car Park

3.72. On turning into the Appeal Site from the Midhurst Road people will be able to access six parking bays, designed as a provision for people who wish to walk within the SANG or within the SDNP. It has been designed in a simple, low key rural style, with a gravel surface. There is the possibility to increase it to twelve spaces if there is demand. A walker's shelter will be built nearby which will include information on the walks available, the local wildlife and notices such as advertising for volunteers to assist in ecological and landscape management.

Community Orchards

3.73. Community orchards are proposed on parts of the south facing slopes of the southern and southwest fields. The trees will be informally grouped, and varieties grafted onto vigorous root stock so that they form sizable traditional orchard trees. Within the AONB landscape they will appear as an informal arrangement of trees.

Allotments

3.74. The appellant has gained consent for allotments on land it owns 370m east of the Appeal Site, immediately south of the Haslemere Memorial Recreation Ground (Planning reference: WA/2023/00029, Core Document 11.1). The Appeal Proposals s106 agreement provides for the gifting of the land to Haslemere Town Council for it to implement and administer the allotments.

Summary of the Effects of the Appeal Proposal on Landscape

3.75. Aside from the implicit change and perceived harm of creating an urban environment within the fields to the north (approximately 22% of the Site) the only other significant adverse landscape and visual impacts (pre-mitigation) arise from the construction of the Midhurst Lane access road into the Site. Potential effects have been minimised through detailed design and extensive mitigation. Once the mitigation has become effective there will be no significant adverse effects on the quality and character of the AONB aside from the change in character of the three fields to an urban environment. Currently travellers and walkers only have glimpsed views of the Site from the Midhurst Road boundary, where it appears as pastureland and woodland. The design seeks to replace this with the perception of an entrance to a country estate with a high-quality landscape; a landscape typography entirely in keeping with landscape types found within the AONB.

3.76. The proposed development will provide a wealth of recreation and learning opportunities for a wide cross section of the community and immediately adjacent to an existing settlement. This contrasts with the current use of the land which is private with limited active value to the local community.

3.77. AONBs were established to benefit the population and the ecosystems within them. If the proposed development proceeds the majority of the Site will be allocated for recreation, learning and habitat enhancement. It should be regarded as an exemplar of how the landscape can be managed and enhanced for the benefit of the population and wildlife. No other development sites within the local plan or potential housing supply pipeline can offer so many landscape, biodiversity and community benefits.

3.78. An AONB designation should not be seen as a similar designation to Green Belt, a purely development control designation. Consultees should consider holistically the overall benefit to an AONB that sensitive development can bring.

5 RESPONSES TO COMMENTS RECEIVED FROM THE SURREY HILLS AONB PLANNING ADVISOR, NATURAL ENGLAND AND THE SDNP OFFICE

3.79. I deal with in this section to specific points raised by the Surrey Hills AONB planning advisor in its consultee responses (**Core Documents 3.10, 3.18 and 3.19**) and these are listed below. I then consider the response from Natural England (NE) as set out in their consultation responses (**Core Documents 3.11, 3.12 and 3.13**).

Effects on visual amenity and the setting of the Surrey Hills AONB from high ground to the north.

3.80. The AONB Adviser comments that:

“Some of the development would be on the highest point of the local landscape. From my site visit I noticed that much of the proposed development would be visible in extensive landscape views from the north”.

- 3.81. It is evident that the central field proposed for residential development affords long distant views to the north, although the foreground view is occupied by the houses and gardens on the southside of Scotlands Close and the recently planted tree belt will in time block this view in summer and offer only filtered views in winter. The high ground to the north is heavily wooded which means that there are very few areas at ground level which allow a person a view of Haslemere and this field. It is evident that windows in the upper floors of a few buildings, which rise above the trees, will afford private views to people within the buildings. At the time of the application tree cover within the Gibbet Hill area prevented views of the site but in 2022 the National Trust felled some trees, allowing glimpsed views of the Appeal Site. The views are, however, distant and likely to be obscured by middle distant trees as they gain stature. A clear day is needed, and the view is south, looking towards the sun, with the houses within Haslemere (including those within Scotlands Close) visible in the foreground. The recently planted woodland on the south side of Scotlands Close will substantially reduce the visibility of the proposed dwellings in this field.
- 3.82. In my opinion, the effect of the Appeal Proposal on the visual amenity of people ascending the ridge to Gibbet Hill will be Negligible, given the nature of the ascent, where views are typically blocked by trees and because the main view from the top of the hill is to the north, not back towards Haslemere.

Effect on the setting of dwellings on the southern edge of Scotlands Close

- 3.83. The AONB Adviser then comments that:

“The development would spoil the setting of the housing Scotland Close from where the development would have a significant impact upon many of the dwellings in contrast to their existing setting”.

- 3.84. This setting cannot be appreciated from a publicly accessible viewpoint and so in terms of an appreciation of the AONB, it is limited to private views from dwellings and gardens. Twelve houses are potentially affected, but most are set at a slightly lower level than the Site and views are partially obscured by garden vegetation. These residents will lose a rural outlook, but development of fields on the edges of settlements is commonplace and there is no right to a view. Mitigating tree planting has been undertaken along this boundary. The Inspector at the Public Inquiry for Phase 1 did not consider that the loss of visual amenity to residents as a result of Phase 1 would be sufficient to warrant refusal. The Inspector also considered that the relationship between the development and the existing dwellings in relation to overlooking met the required standards (**Core Document 9.1, Paras 120 and 121**). The appropriate building off sets for this Appeal Proposal have been adhered to, and if exceptional circumstances apply, a tight relationship of a new urban area to an existing urban area is generally considered desirable.

Not being able to rely on the screening effect of Red Court Woods in the long term

- 3.85. It is largely accepted in the planning system that retained hedges, trees and woodlands that provide a screening function to a proposed development will continue to do so unless there is a specific, highly probable event that would result in their loss. It is rare that a judgement is made based upon the assumption that for whatever reason a woodland within the landscape might disappear at some time in the future. In my opinion lack of management of Red Court Woods due to a do-nothing scenario is more likely to be more harmful than the positive management of the wood that would result if the appeal were granted. The Landscape and Ecological Management Plan, SANG and Biodiversity Net Gain management plans (**Core documents 1.41 and 1.42**) will ensure the woodlands are brought under positive management. The Forest School and Scouts will have a vested interest in preserving and enhancing their woodland setting. It is also important to understand that the woodland rises steeply from the back of the fields along Bell Vale Lane and then the slope slackens across the parkland. The effect of this is that when viewed from the SDNP to the south the proposed housing will be set back below the angle of view, which is elevated by the parkland plateau and the trees within it.

Change of character to the Midhurst Road

- 3.86. I have previously dealt with this issue in my proof, concluding that once the mitigation is effective its green and enclosed character can be re-established.

Representative views within the LVIA

- 3.87. The comment from the AONB Adviser is:

“The submitted LVIA is only a snapshot at one point in time in a transient landscape which in this case was in the summer with leaves on trees and shrubbery”.

- 3.88. This statement is incorrect. Views 1,2,3,4,5,6,7,9,10,11,12, 13,15,16, 17 and 21 were taken in February or early March when the deciduous vegetation was out of leaf. During the application additional winter views were provided for Views 14 and 20 within the LVIA chapter addendum.
- 3.89. Almost all of the photographs illustrating landscape character and presented within the LVIA were taken in winter.
- 3.90. In order to be totally transparent about inter-visibility, photographs were taken from the highest point of the Site from a cherry picker with the camera set at the ridge height of the tallest building (as illustrated within **Figure 13**). The photographs were taken on the 18th of March 2022; the deciduous tree were not in leaf. The misconception has possibly arisen because of the high level of holly in the vegetative cover.
- 3.91. The comment from the AONB Adviser is:
- “Whilst, the site is not a remoter location, with darker skies, the development would nevertheless cause light pollution on higher ground making it more conspicuous in times of darkness and extend the lights of the town into open countryside”.*
- 3.92. This issue was addressed in relation to Phase 1 Inquiry where it was accepted that it will be possible to illuminate that development to a sufficient standard to ensure a

safe environment and comply with lighting in an E1b Zone if the recommendations within the Lighting Strategy are implemented (**Core Document 9.1 Para 102**). A similar lighting strategy would be drawn up as part of the detailed application for the residential part of the Appeal Proposal.

3.93. It was noted at the Inquiry that an approved allocation for a two hundred and twenty-six home residential development on greenfield land at Old Malling Farm within the South Downs National Park was made in June 2021 (Planning Ref: SDNP/18/06103/OUT). The site lies within an E1b zone illustrating that with the right lighting strategy, residential development can be acceptable in E1b areas.

3.94. In the Phase 1 Appeal the inspector stated in Para 102, under Dark Skies:

“The Haslemere Neighbourhood Plan (HNP) Policy H10 seeks to ensure that new development is designed to minimise the effect of external lighting. The Institute of Lighting Professional Guidance Note for the reduction of obtrusive light distinguishes different areas such as urban, suburban and rural and defines them into a series of environmental zones for the control of obtrusive light. Whilst there is some debate about where the appeal site fits, there is common ground between the parties that an appropriately worded planning condition on any approval could require an appropriate lighting scheme. The South Downs National Park Authority is satisfied with such a condition. I am also satisfied that the impact of external lighting on dark skies can be mitigated by an appropriately designed scheme. The appeal proposal would therefore comply with HNP Policy H10”.

3.95. The Appeal Proposal will lie adjacent to Phase 1 and will have a similar relationship with Haslemere, with a similar degree of visual enclosure and built form and so there is no reason why an appropriate lighting scheme could be achieved through condition. I can confirm that no estate streetlighting, such as column mounted lights, is required for the development.

3.96. Table 3 is a check list of how the Appeal proposal complies with the policies within the Surrey Hills AONB Management Plan (**Core Document 7.9**). Green shading within the table indicates compliance, grey not applicable).

Table 3: Compliance of the Appeal Proposal with the policies in the Surrey Hills AONB Management Plan

Surrey Hills Management Plan Policies	Compliance with the Management Plan Policies	Explanation
Agricultural Management Policies		
F1	Farming as a viable and sustainable enterprise, within and adjacent to the AONB, will be supported through the development of initiatives consistent with good management of land, make a positive contribution to increasing biodiversity and conserving or enhancing landscape character.	The Site is not used for agricultural purposes and is not of a sufficient scale to form a feasible agricultural holding. The Proposals will not lead to loss of farmland. Refer to report Agricultural Land Classification and Soil

Surrey Hills Management Plan Policies	Compliance with the Management Plan Policies	Explanation
		Resources at Land at Scotland Park, Haslemere, Surrey, Reading Agricultural Consultants (Core Document 2.41).
F2	The availability of advice and financial assistance through the Government's Environmental Land Management schemes will be designed to encourage sustainable land management practices alongside the maintenance and enhancement of traditional landscape features.	As above.
F3	Farm diversification schemes will be supported where they help to maintain and enhance the special landscape character of the AONB and have a demonstrable, positive amenity impact, lead to an increase in biodiversity and contribute to the vitality of the Surrey Hills economy.	As above.
F4	Development leading to a loss of farmland will normally be resisted unless there is an overriding public interest.	An exceptional circumstances case is made on the basis of NPPF paragraph 117, demonstrating the public interest case, though as demonstrated the site comprises both countryside / woodland, and is not farmland.
F5	A wider understanding and awareness of agricultural practice will be promoted where this encourages and supports the creation and maintenance of the outstanding landscape character of the Surrey Hills	As above.
Woodland Management Policies		
W1	Woodland owners and managers will be supported to manage all woodlands, hedgerows and veteran trees that contribute to the landscape character.	Red Court Woods contribute to the character of the AONB and setting of the SDNP. The woods have been neglected for many years and will be brought into positive management via an approved Landscape, SANG and Ecological Management Plan, which will maintain and enhance their contribution to the character of the AONB, as will the extensive planting is proposed throughout the Appeal Proposal.
W2	Markets for timber and other forest products will be identified, promoted and supported in order to generate incomes to help sustain appropriate woodland management	It is proposed to fell an area of Douglas Fir and larch which was planted as a timber crop and has now matured. It will be harvested over several years and will provide timber

Surrey Hills Management Plan Policies	Compliance with the Management Plan Policies	Explanation
		for the Scout Hut and Forest School. The wood will be managed to produce timber for woodland crafts as part of the educational aspects of the Scouts and Forest School.
W3	The wider importance of trees and woodlands and the need for their management, including disease control and bio-security, will be promoted through the provision of advice, information on grant schemes and public awareness campaigns.	<p>The woodland Green Infrastructure will be appropriately managed. A Landscape, SANG and Ecological Management Plans (Core Documents 1.41 and 1.42) and ongoing management agreed through the S106 agreement. A Tree Protection Plan supports the application.</p> <p>Public awareness improved via public information boards.</p>
W4	The benefits of removing inappropriate trees and secondary woodland, particularly for the restoration of heathland and chalk grassland, will be promoted to improve biodiversity and enable the reinstatement of views.	It is proposed to fell an area of Douglas Fir and larch which was planted as a timber crop and has now matured. It will be harvested over several years and will provide timber for the Scouts and Forest School. The regular stand of alternating rows of species is incongruous within the natural woodland. The cleared ground will be replanted with broadleaf species appropriate for the woodland.
W5	Opportunities will be taken to extend and link woodland / hedgerow habitats for landscape, nature conservation, recreation, and educational purposes.	<p>The Proposals include the Forest School Scouts and nature reserve to promote educational and recreational uses in the AONB.</p> <p>In addition, a SANG is included within the Proposals. Educational and information boards can be secured through the SANG Management Plan.</p> <p>Extensive tree and hedge planting will be undertaken as well as enhancement of grassland and woodland ecosystems for the benefit of nature conservation.</p>
Biodiversity Management Policies		
B1	Existing designated sites (SSSIs, SPAs & SACs) within the AONB will be conserved, enhanced & managed by partners with the support of Natural England, to ensure that all such sites are brought into or maintained in	Many development Sites within Haslemere will need to ensure that their impacts are mitigated against via the provision of / contribution

Surrey Hills Management Plan Policies	Compliance with the Management Plan Policies	Explanation
	'favourable' condition. The importance of designated sites and the need for their protection and management will be promoted to the wider AONB community through information and awareness campaigns.	<p>towards SANG, even small sites if a cumulative approach is taken. The Site offers a strategy solution for the town, and to Redwood's knowledge this is the only available option that has been put forward.</p> <p>The SANG will create connections to the wider countryside and the National Park to the south.</p>
B2	Important habitats, such as chalk grassland and heathland, will be managed and used in ways that conserve and enhance their nature conservation value.	The LEMP (Core Document 1.41) and associated funding will ensure that the valuable habitats on site are protected and enhanced. Only the agricultural grassland will be sacrificed for housing.
B3	Opportunities will be taken to restore, extend and link habitats for nature conservation, and educational purposes, with the creation of new habitats and corridors informed by landscape character to establish functional ecological networks with resilience to climate change.	The Midhurst Road access will result in some short term loss of connectivity but overall the Appeal Proposal he proposed development will strengthen ecological networks on the Site.
B4	The enhancement of biodiversity will be maximised through the targeting of advice and grants, and applicants for planning permission will be expected to deliver biodiversity gains as part of their proposals secured through planning conditions or legal agreements where appropriate.	The Appeal Proposal will enhance biodiversity and deliver Biodiversity Net Gain.
B5	Measures required to meet Water Framework Directive targets for the river catchments will be supported to conserve and enhance the ecological value of river landscapes, wetland habitats and water quality affecting the environmental quality and landscape of the Surrey Hills.	A fully detailed SUDS strategy (Core Document 2.47) has been prepared as part of the application including a large area of wetland.
Cultural Heritage Management Policies		
HC1	A historic perspective of how the AONB landscape has evolved will be promoted, including its traditions, industries, buildings and settlement patterns.	The historical perspective of the landscape will be promoted through the Forest School, Scouts and SANG interpretation.
HC2	Heritage assets, including historic buildings, archaeological sites and historic parks and gardens, will be conserved, managed and recorded.	The Proposal will protect the setting of the listed buildings of Red Court and enhance the setting of Lowder Mill.
HC3	Development proposals will have due regard to the locally distinctive character of rural settlements and the setting of historic buildings.	A high-quality scheme is proposed which reflects and complements the local traditional architecture and is

Surrey Hills Management Plan Policies	Compliance with the Management Plan Policies	Explanation
		intended to reflect the style and quality of Phase 1.
HC4	The rich artistic traditions of the Surrey Hills will be promoted. New artistic interpretations of the landscape and its heritage will be commissioned with the involvement of local communities.	The Scouts, Forest School and local community will have the opportunity of using the woods and paddocks for art, responsibly organised through those responsible for the implementation of the management plan.
Recreation, Health and Wellbeing Management Plan Policies		
RT1	Visitors and facilities that enhance people's health, enjoyment and understanding of the Surrey Hills will be encouraged, whilst conserving or enhancing the landscape character and biodiversity.	Provision of SANG, providing wider benefit to new and existing residents. New and safe pedestrian access for residents of Haslemere through the Site to the National Park. Landscape positively managed through the Landscape, SANG and Ecological Management Plan (Core Documents 1.41 and 1.42). Provision of a walkers car park, Scout and forest school facilities and nature reserve.
RT2	Information will be made accessible for a diverse range of potential visitors in order to foster a greater understanding and enjoyment of the Surrey Hills AONB.	Use of the SANG to the local community will be promoted through various media. Routes through the SANG will be waymarked in conjunction with map boards and interpretation boards. The Scouts and Forest School will also result in a diverse range of visitors and educational opportunities. The Proposal will improve public access to the AONB, wider countryside and National Park through permissive pathways and the SANG and Core Document 1.41)
RT3	Significant viewpoints and vistas will be identified, conserved and enhanced.	Several viewpoints will be created within the SANG, currently not available to the general public.
RT4	The design and development of new visitor facilities, and the maintenance of existing facilities, will have regard to the needs of people of all abilities to access and enjoy the Surrey Hills landscape.	A new SANG car park is proposed to ensure that this new area of public space is accessible to all. The SANG is also accessible via proposed permissive paths, and footpath links to Haslemere.

Surrey Hills Management Plan Policies	Compliance with the Management Plan Policies	Explanation
Planning Management Policies		
P1	In balancing different considerations associated with determining planning applications and development plan land allocations, great weight will be attached to any adverse impact that a development proposal would have on the amenity, landscape and scenic beauty of the AONB and the need for its enhancement.	The Proposal will have an adverse effect on the landscape character of the northern fields as they will be converted to a residential townscape but the fields are afforded good visual enclosure so that the wider landscape character and visual effects will be minimal. These adverse effects should be balanced against the substantial benefits associated with the large area of amenity greenspace within the south of the application, which is the majority of the site. Overall beneficial landscape effects will balance out adverse effects.
P2	Development will respect the special landscape character of the locality, giving particular attention to potential impacts on ridgelines, public views and tranquillity. The proposed use and colour of external building materials will be strictly controlled to harmonize within their related landscape and particularly to avoid buildings being incongruous. In more remote locations, with darker skies, development proposals causing light pollution will be resisted.	The Proposal locates the main urban area within the northern fields, adjacent to the urban edge of Haslemere. The height parameters proposed in the application have been tested on Site to ensure that the wooded ridgeline will not be affected. The design of the urban area will reflect the local vernacular and echo the design of Phase 1. Advanced tree planting has been undertaken to minimise adverse effects in a shorter timeframe. A lighting strategy will be implemented to achieve a 1b lighting zone as defined by the SDNP.
P3	Development proposals will be required to be of high-quality design, respecting local distinctiveness and complementary in form, setting, and scale with their surroundings, and should take any opportunities to enhance their setting.	The design of the urban area will reflect the local vernacular and echo the design of Phase 1
P4	Proposals that would assist in the continuation of direct agricultural and forestry businesses or benefit the social and economic well-being of residents, including small scale affordable housing, will be supported, providing they do not conflict with the aim of conserving and enhancing the beauty of the landscape.	Social and Economic Benefits of Proposals – health and wellbeing etc. Policy Complaint Affordable Housing enabling greater accommodation choice for local workers.

Surrey Hills Management Plan Policies	Compliance with the Management Plan Policies	Explanation
P5	Proposals to redevelop or convert farm buildings that would render the associated farmed landscape unviable will be resisted.	This is not applicable to the Proposals.
P6	Development that would spoil the setting of the AONB by harming public views into or from the AONB will be resisted.	Care has been taken to ensure that the Proposal will have no significant adverse effects on views into or out of the AONB once mitigation has become effective (although there will be very few views into the Developed Area and few will need mitigation).
Traffic and Transport Management Policies		
TT1	Measures to ensure opportunities for all members of society to access the Surrey Hills will be supported.	The Site is presently private land with limited public access, the SANG, Scouts and Forest School offering will ensure public access to this land. The inclusion of the Scout facility and Forest School further enhances the opportunities for educational benefits.
TT2	The impact of development proposals on the surrounding Surrey Hills road network, including any highway mitigation measures, will be given great weight when assessing the acceptability of the development.	The highway authority considers the Appeal Proposal acceptable with regards to highway matters.
TT3	Design and enhancement of the rural road network will conserve and enhance the AONB to influence the behaviour of road users for public safety and enjoyment.	The proposed Midhurst Road access will initially have a substantial adverse effect but this can be mitigated over time.
TT4	Transport infrastructure and associated landscaping, including verge management, will respect and enhance the local landscape quality, character and biodiversity.	A comprehensive landscape scheme, including advanced planting, will ensure that the proposed access road becomes fully integrated into the landscape and that the effect on the character of the Midhurst Road is minimised and mitigated.
TT5	Major transport infrastructure will have due regard to the AONB designation. Measures will need to be taken to integrate it into the Surrey Hills landscape.	Not applicable, the Appeal Proposal is not major transport Infrastructure.
The Economy, Tourism and Community Development Policies		
CE1	The Surrey Hills will be promoted as a destination for sustainable tourism and recreation.	The SANG, Scout Facility, Forest School and walkers car park will encourage visitor use.
CE2	Initiatives that promote and market high quality Surrey Hills produce and services will be supported.	Potential for produce from the allotments, orchards and woodland.

Surrey Hills Management Plan Policies	Compliance with the Management Plan Policies	Explanation
CE3	The provision and retention of affordable housing for local people and key workers will be supported.	The Proposals go beyond the Policy requirements with regard to affordable housing.
CE4	Initiatives that result in affordable and reliable community transport and infrastructure for recreation, employment and access to local services will be supported.	See Economics Benefits submitted with the Application including a contribution to affordable community transport.
CE5	Opportunities to develop land management and conservation skills through vocational training, volunteer work and paid employment will be identified and actively promoted.	See Economics Benefits submitted with the Application. The Forest School and Scouts facilities will teach a new generation land management and conservation skills.
CE6	Greater awareness of the Surrey Hills AONB will be supported to foster a pride of place that encourages community action to protect, enhance and enjoy its landscape.	The Proposals incorporate land for the Scouts and Forest School, and hence actively facilitate education.

3.97. I conclude that if exceptional circumstances apply, then the proposed development is largely compliant with the aspirations of the Surrey Hills AONB Management Plan. Harms are balanced by the benefits of positive management of a large area of the AONB, improved public access for its enjoyment and educational and recreational opportunities for a wide cross section of the community.

Natural England Consultee Response

3.98. Natural England objected to the application in its consultation response letter dated 13 September 2013, the two main reasons being that the Appeal Proposal would:

- *have a significant impact on the purposes of designation of Surrey Hills AONB*
- *result in a direct and irreversible loss of Surrey Hills AONB designated land.*

3.99. Again, I would make the case, that if viewed holistically the Appeal Proposal does meet many of the aspirations associated with the AONB in terms of greater access, engaging young people in the natural environment and bring a significant area of the AONB into positive management. The main stance of Natural England is that in its opinion exceptional circumstances do not apply and so the application is contrary to national and local policies. It did not seek to weigh the harms with the benefits.

3.100. Specific points raised by Natural England include:

“Meadowlands Drive, where the proposed dwellings will be visible in winter months, will be impacted and Hedgehog Lane has been assessed to also have views into the proposed development site”.

3.101. I do not consider that this would be a significant effect. There will be no views of the AONB when the deciduous trees are in leaf and in winter the proposed dwellings will only be glimpsed through the gaps in the houses at Scotlands Close (as illustrated by View 13 in the LVIA). Once the tree belt has established on the northern boundary

the houses will be barely perceptible. There will be no public views from Hedgehog Lane, only views from a few properties on the south side of Hedgehog Lane. I recommend that the Inspector visits these areas to assess the likely visual effects.

3.102. The issue of views within the Landscape and Visual chapter of the ES being summer views was also repeated, despite the fact that most of the views were winter views. The screening to the Developed Areas will be substantially greater when the deciduous vegetation is in leaf. The issue of whether the loss of the removal of the conifer plantation would open up views of some of the proposed dwellings was also raised. The felling will be undertaken in two phases to minimise the change to the landscape. The upper line of conifers will initially be retained for a further 10 years to maintain them as a skyline feature. The lower conifers will be felled, and a swale constructed within the felled area. The land either side of the swale will be planted with native broadleaved species such as oak, beech, lime and chestnut. Once these have established the remaining stand of conifers will be felled. The loss of the conifers will not open up views of the proposed residential area further to the north because there is 150m depth of deciduous woodland behind the stand of conifers (which is approximately 45m wide). This deciduous woodland occupies rising ground behind the conifers, climbing from 161m AOD to 186m AOD. The removal of the conifers will not open up views of the proposed main urban area. This was addressed in the Addendum to The Landscape and Visual Assessment, February 2023 (**Core Document 2.44**).

3.103. The Natural England response offers its standard advice within Annex A of the letter (**Core Document 3.13**). The Appeal Proposal applies all the relevant principles set out in the Annex, such as Environmental Gain, Habitat Enhancement, Biodiversity Net Gain, protection of Protected Species, improved Access and Recreation and avoidance of Best and Most Versatile Agricultural Land and Soils. The Appeal Proposal should be regarded as an exemplary example of sensitive sustainable development within a designated landscape.

3.104. I conclude that the landscape benefits of the Appeal Proposal should be weighed against the direct but limited adverse effects on the Surrey Hills AONB that will result from the conversion of a small part of the Appeal Site to housing and the construction of the Midhurst Road access.

The Effect of the Proposal on the Setting of the South Downs National Park

3.105. This section will deal with the specific objections raised by the SDNP and the overlap with the Council's statement of case with regards to the effects on the setting of the National Park.

Midhurst Road Access

3.106. The Council's Statement of Case (**Core Document 5.2**) seems to confine this to the effect of the Midhurst Road junction on travellers heading south towards the National Park.

"The significant engineering works, tree loss and vehicle movements would undermine the narrow tree lined character of this route would be lost which would significantly undermine the rural character of this length of the narrow main road

which represents the transition from town to countryside, detrimental to the Surrey Hills AONB and the setting of the South Downs National Park."

Effect on the setting of the SDNP

3.107. The Council's Statement of Case states that *"The appeal scheme would introduce a quantum of development on a greenfield site, which would result in an urbanising impact detrimental to the landscape value and the intrinsic character and beauty of the Surrey Hills AONB and the setting of the South Downs National Park"*.

3.108. However, the SDNP consultee response (**Core Document 3.5**) states:

"We consider the application site does comprise the setting of the SDNP - most strongly the southern part of the SANG area that abuts the National Park boundary along Bell Vale Lane and the western area of land adjacent to the A286 Midhurst Road where a new road entrance is proposed.....". "The transition from town to countryside is likely to be significantly undermined by tree loss (the narrow, tree lined character of this route is not being replaced) and significant engineering works".

3.109. The Appellant has taken care to ensure that the tree lined character is re-established, albeit leaving a gap for the road to pass through.

3.110. There is no mention by the SDNP office that the housing will be visible from the SDNP. There is the SANG area that abuts the SDNP along Bell Vale Lane, but the aim is to create wet heathland which we would argue is one of the more desirable landscape types in the area as the popularity of the Commons and heaths in the area indicate. The consultation letter from the SDNP office (Core Document 3.5) states:

"The submitted design sets out some principles which are broadly supported by the SDNPA including conifer removal and broadleaf restoration, enhancement of grasslands, and access improvements and links".

Character of the SANG

3.111. The SDNP consultation letter states:

"In terms of non-vehicular access provision, some of the interventions are positive, and the general principle of providing routes within the site is supported as is connectivity to the SDNP (and Sussex Border Path) to the south. However, some areas may not be suitable for formally laid out routes which can fundamentally change the character - particularly of the semi-natural habitats being restored around Stedlands. A better balance would be appreciated in the setting of the SDNP and to have a far lighter touch approach to access so it is less 'country park' and more countryside. This could be through unmade footpaths and fewer overt interventions with signage, bins, interpretation panels etc."

3.112. The Appellant provided clarification on this matter since it appeared that the drawings were being mis-interpreted and the country park connotation was misleading. The landscape design approach is very low key, footpaths will not be paved (aside from the pedestrian/cycleway), initially routes will be set out by close mowing paths through the meadows with the aim that paths will eventually form naturally through wear, just

like any rural footpath. Furniture will be kept to a minimum and will be rustic and low key. The greenspace within the Appeal Proposal will be very similar to that of Valewood Park at the end of Belle Vale Lane, 600m to the southwest of the Appeal Site.

3.113. And

“This new road entrance onto the A286 is described as being designed to reflect the character of an entrance to a country park or estate. As with our comments above in regard to the southernmost part of the SANG land, we do not think a country park character would be characteristic for the setting of the SDNP”.

3.114. In my view an appropriate quantum of development is proposed my proof and gate houses and lodges on main roads, signposting a country estate are a key characteristic of the Surrey Hills AONB and SDNP landscape and so not inappropriate.

3.115. THE SDNP also states:

“The complex of fields around Stedlands Farm and directly adjacent to the SDNP boundary are assart fields - identified in the Surrey HLC and likely at least medieval in origin. Their conservation and enhancement should be a priority for this part of the SANG and are a tool for interpretation themselves. The detailed SANG designs appear to have been drawn up with no awareness of this sensitive asset, and they are currently harmful. We would recommend their historic boundaries are restored and the ponds are relocated to a less sensitive location”.

3.116. In my opinion the proposal retains the historic boundaries of the 1890 Ordnance Survey plans and the proposed landscape character of semi-open grassland and heath with scattered trees is characteristic of assart, especially if compared to the existing condition of open fields covered in a uniform agriculturally enhanced grazing sward.

3.117. Ponds are a strong characteristic of the valley and so the proposed wetland will not be out of keeping with local landscape character. Increasing biodiversity is an important strategic aim of the planning framework, which this design achieves. The SDNP officers response states:

“In addition, a number of community/traditional orchards are proposed. These would be more characteristically located close to the settlement and so may better be located closer to Stedlands. We would also suggest that confirmation is sought that the grasslands have been soil tested in order to prescribe the habitats and species proposed. If not, this should be undertaken to ensure they are appropriate”.

3.118. My response is that the eastern orchard is located as close to Stedlands as it can be and has been designed as an informal grouping of trees on rootstocks that will result in large trees. It will be perceived in the landscape as a natural group of trees rather than a commercial orchard and as such we consider the design will make a positive contribution to the setting of the SDNP, as well as providing benefit to the community and biodiversity. The orchard to the west has also been designed as an informal group

and there is already an orchard in the plot immediately to the south of it. It will not be out of character and such informal, productive tree groups are characteristic of assart.

3.119. The ecological surveys indicate areas of species rich acidic grassland in some localities, and it is proposed to mix acidic subsoil with the topsoil in the southern fields to create a nutrient poor substrate. We will undertake a trial to determine how to create the most appropriate substrate to ensure that a biodiverse sward can be created and will undertake soil sampling and testing to inform this procedure.

3.120. The SANG is compliant with NE guidelines, which seek to achieve as natural a landscape as possible.

6: THE APPEAL PROPOSAL IN RELATION TO POLICIES SP2, RE1 AND RE3 OF THE LOCAL PLAN PART 1 (2018), POLICIES DM11 AND DM15 OF THE LOCAL PLAN PART 2 (2023), POLICY H9 OF THE HASLEMERE NEIGHBOURHOOD PLAN AND PARAGRAPHS 176, 177 AND 180 OF THE NPPF.

3.121. One of the main reasons for refusal is that the proposal would be contrary to policies SP2, RE1 and RE3 of the local plan Part 1 (2018), Policies DM11 and DM15 of the Local Plan Part 2 (2023), Policy H9 of the Haslemere Neighbourhood Plan and paragraphs 176, 177 and 180 of the NPPF. In this section I consider the compliance of the Appeal Proposal with these policies.

RE1 – Countryside beyond the Green Belt and RE3 - Landscape character

3.122. In the Appeal Decision the Inspector for Appeal Ref: APP/R3650/W/21/3280136, Land off Scotland Lane, Haslemere (**Core Document 9.1**), under Planning Balance Para 145 stated:

“I have found that the proposal would not recognise the intrinsic character and beauty of the countryside as required by Policy RE1. Whilst it would cause no harm to the Surrey Hills AONB or the South Downs National Park, it would cause harm to the character of the AGLV in conflict with LPP1 Policy RE3 (ii). As the scheme would cause localised harm, typical of any greenfield development on the edge of a settlement, I attribute moderate weight to this policy conflict. loss of green fields but the effect limited and substantially compensated by the provision of greenspace and its positive management. The character, quality, accessibility and community use of that part of the countryside will be elevated”.

3.123. It is accepted that the Development Area of the Appeal Proposal will also be contrary to RE1 and RE3 viewed in isolation, but the works and uses proposed for 78% of the site, the Wider Landholding will be compliant and beneficial. The reason I conclude so is for the following reasons. Countryside needs to be positively managed to preserve its intrinsic character and beauty. Typically, the land around Haslemere is managed for productive agriculture or is heath and woodland, either managed by nature conservation organisations or organisations such as the National Trust. Other areas form parts of large residential properties or estates. Land usually needs a purpose for time, cost and effort being made for its management. For decades Red Court was owned by a foreign company prior to its purchase by the Appellant and since it was infrequently visited, it had fallen into decline, clearly evident when I first

visited in 2017. The house and gardens have since been restored and the Appellant has undertaken substantial works to improve the area of countryside that forms the Appeal Site. The historic tracks through the woods have been cleared, reopened and drained and scrub has been removed from the parkland, including invasive rhododendron. Extensive new planting has been undertaken to enhance existing wildlife corridors and create new ones. There is still much work that can be undertaken to improve the quality and character of Red Court Woods, such as removal of invasive species and improving its woodland structure by implementing a cyclical management regime..

- 3.124. The Appeal Proposal will give a range of purposes to the 78% of the site that will remain countryside and these purposes will ensure that its character and intrinsic beauty is preserved and enhanced. The proposed uses are why the Appeal Proposal will meet so many of the aspirations of the SHAONB Management Plan. Without the Appeal Proposal the land will lack purpose and is likely to become an unproductive, unused, urban fringe area with once again little incentive for investment into it and its positive management. In my experience such urban fringe land with no clear purpose inevitably falls into decline and misuse. In contrast the Appeal Proposal will give the land a clearly defined purpose, for the benefit of a wide cross section of the community, prescribed by legal agreement, in perpetuity with appropriate funding for its long-term care. It is this which will ensure that its character and intrinsic beauty is preserved and enhanced while a do-nothing scenario will result in an uncertain future.
- 3.125. I conclude that while there will be some conflict with RE1 associated with the Development Area this will be countered by benefits to the more extensive Wider Landholding, resulting in compliance overall.
- 3.126. The SHAONB designation which overlays this part of the RE1 and RE3 carries greater weight in terms of how policy is interpreted than underlying AGLV. If exceptional circumstances come into play, then there is no conflict with AGLV and AONB policies as long as an assessment of harms versus benefits is made. In my opinion a sufficient level of landscape related compensation is offered in relation to the likely partial landscape harms to countryside and landscape character that may arise because of this application, as I have previously set out within the Compensation for Harms section of my evidence.
- 3.127. I conclude that in terms of the landscape and visual effects in relation to RE3, the quantum of beneficial effects balance with the quantum of adverse effects (post mitigation) resulting in an overall Neutral effect on the character, quality and purpose of the SHAONB. In my opinion the Appeal Proposal will “*respect and where appropriate, enhance the distinctive character of the landscape in which it is located*” as demonstrated by previous statements in the proof. The second part of RE3 is dealt with in sections 2, and 4.

DM11 - Trees, Woodland, Hedgerows and Landscaping

- 3.128. Care has been taken to minimise tree loss throughout the Appeal Proposal, respect root protection areas and avoid conflict between dwellings and existing trees, complying with sections a), b) and c) of the policy. The only exception being tree loss is that along the Midhurst Road. In my view the overall benefit of the scheme, in terms of trees, woodland and hedgerows is clearly beneficial but to quantify this I have assessed the tree loss and gains using a *Trees and Development Sites Guidance for*

New Developments (a Supplementary Planning Document Adopted April 2021 South Gloucestershire District Council, **Core Document 13.1**), in the absence of similar guidance within WBC. Essentially the larger the tree lost, as determined by its girth, the greater the number of nursery stock trees are required to replace it, as set out in Table 4. Similar metrics are set out in tree replacement SPD’s within other councils such as Bath and North East Somerset and Bristol City Council.

Table 4: Tree compensation requirement for size of trees lost (South Gloucester Shire District Council SPD)

Trunk diameter of tree lost to development (cm measured at 1.5m above ground level)	Number of replacement trees required
Less than 15cm	0 – 1
15-19.9cm	1
20-29.9cm	2
30-39.9cm	3
40-49.9cm	4
50-59.9cm	5
60-69.9cm	6
70-79.9cm	7
80cm+	8

- 3.129. Table 5 sets out the number of trees that need to be planted based on trees lost as a result of the appeal proposal. It does not take account of the trees to be felled within the conifer plantation. It includes trees identified by the arboriculturalist for removal due to poor condition (classified as U) which do not normally contribute to the replacement total under such SPD’s, but for completeness these are recorded. While many U trees are classified for removal for arboricultural reasons, those not situated within a build zone can be retained as senescing trees for wildlife benefit. The trees to be retained and trees to be lost are identified in **Appendix 3**. The plans are extracts from the Arboricultural report, I have coloured the plans to make the loss and retention clearer. There is a third category of tree coloured. These are trees within the outline area which the arboriculturalist has marked for removal due to conflict with the development, but it is likely that these can be retained at the detailed design stage by minor design modifications, since they are largely affected by cycle paths, rustic play areas and swales which can be relocated or designed to have no impact on root protection areas. However, for this exercise they are included in the table below as trees to be lost.

Table 5: Calculation of the number of replacement trees required based on Supplementary Planning Document Adopted April 2021 South Gloucestershire District Council.

Tree number	Trunk Diameter (cm)	Number of replacement trees required
102 Common Beech	79	7
103 Common Beech U	125	(8)
104 Norway Maple	22	2
105 Norway Maple	36	3
106 Norway Maple	59	5
108 Common Beech	38	3
109 Common Beech	48	4
110* Common Ash	9	1
111* Common Ash	16	1
112 Goat Willow	13	1
113 Common Holly	22	2
114* Blackthorn	11	1
115 Silver Birch	51	5
116* Common Beech	15	1
117* Common Beech	16	1
118 Pedunculate Oak	15	1
119* Sweet Chestnut	12	1
125 Pedunculate Oak	41	(4)
128 Common Ash	69	(6)
131 Common Beech	106	8
132 Common Beech	34	3
158 Mountain Ash	29	(2)
159 Common Holly	24	2
160* Common Hawthorn	8	1
161 Common Beech	111	8
162 Common Beech	56	5
176 Silver Birch U Removed	51	(5)
177 Silver Birch U Removed	53	(5)
182 Common Beech	76	7
187 Common Beech	43	4
189 Pedunculate Oak	16	1
214 Pedunculate Oak	55	5
215 Common Beech	70	7
227 Common Alder U	34	3
228 Pedunculate Oak U	67	(6)
251 Silver Birch U	37	(3)
252 Pedunculate Oak	85	8
298 Sweet Chestnut U	53	5
305 Sweet Chestnut	47	4
G1.9 Whitebeam	28	3
G101.1 Common Beech	97	8
G101.2 Common Beech	85	8
G101.3 Common Beech	32	3
G101.4 Common Beech	73	7
G101.5 Common Beech	63	6
G101.6 Pedunculate Oak	64	6

Tree number	Trunk Diameter (cm)	Number of replacement trees required
G101.7 Pedunculate Oak	72	7
G101.8 Pedunculate Oak	45	4
G101.12 Common Beech	72	7
G101.18 Pedunculate Oak U	74	(7)
G101.21 Sweet Chestnut U	75	(7)
G101.28 Sweet Chestnut U	34	(3)
Grp 102 Holly	2	1
Grp 103 Holly	17	1
G109.5 Silver Birch U	42	4
G110.1* Common Hazel	12	1
G110.2* Common Holly	12	1
G110.3* Common Hawthorn	12	1
G110.4* Mountain Ash U		1
G110.5* Mountain Ash	37	3
G111.1 Common Holly U	55	(5)
G111.2 Common Holly	48	4
Grp 115 Common Holly	13	1
Grp 116 Common Holly	10	1
Grp 119 Common Holly	5	1
Grp 121	10	1
Grp 122 Rowan	13	1
G122.1* Common Holly C1	28	2
G122.2 Silver Birch U	46	(4)
G122.8 Silver Birch U	43	(4)
Grp 129 Silver Birch	12	1
G143.3 Douglas Fir	58	5
G143.13 Common Beech	24	2
W101.29 Common Beech	72	7
W101.30 Pedunculate Oak	68	6
Total of trees required as replacement		214 minimum +(69) = 283 maximum.

- 3.130. The detailed part of the application includes detailed planting plans within which 263 trees are shown and specified, exceeding the 214 trees that are required to be replaced if a typical tree replacement SPD was followed. This figure does not include the planting of smaller stock such as transplants within hedges etc. The figure also excludes trees that will be planted within the outline part of the application (the urban area) where the illustrative masterplan indicates that around 120 additional trees would be planted. It does not include any of the trees that have recently been planted within the Appeal Site.
- 3.131. There will also be a substantial benefit to trees and woodland ecology due to the proposed restoration of Red Court Woods in terms of introducing coppice management and the eradication of invasive alien ground flora, which is restricting natural regeneration. The Scouts and Forest School are likely to undertake tree planting schemes within their landholdings and the wider green space.
- 3.132. In my opinion the Appeal Proposal delivers a substantial overall benefit to the AONB in terms of new planting and positive woodland management with the additional

benefit of the educational opportunities around such activities, led by the Scouts and Forest School.

DM 15 – Development in rural areas

3.133. This policy states that in rural areas, development should:

a) Not be isolated from everyday services and facilities, while maximising opportunities for walking and cycling and seeking to avoid dependency on private vehicles, taking account of the nature and functional needs of forms of development which are acceptable in rural areas;

3.134. I consider that the Appeal Proposal is compliant due to its proximity to Haslemere and Phase 1, with cycling and walking links to it, together with onward enhanced links to Haslemere, as well as cycling and walking routes through the proposed greenspace areas. The evidence of Charles Collins will give further information on sustainable transport provision.

b) Recognise the natural beauty and undeveloped character which is intrinsic to the open countryside, together with the distinctive character and pattern of development in areas of urban-rural transition and rural settlements, while making efficient use of land;

3.135. As discussed previously in my evidence, in my opinion the Appeal Proposal strikes the right balance between the providing an appropriate quantum of development on the area of the site that can absorb it, while preserving and enhancing the natural beauty and undeveloped character of the majority of the Appeal site.

c) Recognise the benefits of areas of best and most versatile agricultural land. Where it can be demonstrated that significant development of agricultural land is necessary, areas of poorer quality should be preferred to those of higher quality.

3.136. This is covered in the evidence provided by Charles Collins, but the Appeal Proposal is deemed to be compliant.

3.137. In its SoC WBC states that:

“the appeal scheme has a poor relationship with the settlement boundary of Haslemere; it would appear detached from the developed area and would have little visual association with the built environment of the developed area of Haslemere”.

3.138. I note that this issue was not a reason for refusal in the Decision Notification nor mentioned in the Officers Report. The area where it is proposed to build dwellings clearly has a tight relationship with the settlement boundary of Haslemere and is in many respects no different to Phase 1, which lies immediately to the northeast and also abuts Scotlands Close. Residents will have pedestrian and cycle access into Phase 1 and from there along the pedestrian improvements associated with that scheme along the route that leads to the recreation ground and town centre. There will also be pedestrian access to the junction of Scotland Lane with the Midhurst Road and to the proposed Midhurst Road junction.

3.139. In my career I have not come across a policy that requires a development to have a ‘visual relationship’ with the built environment and WBC does not have such a policy. In my experience the best outcome is if an urban extension has a tight association with an urban area in terms of sustainable access and transport links but does not have a cumulative visual effect with the existing urban area. In this instance the Appeal Proposal will be a discrete extension to the urban area, beneficial in terms of minimising its impact on the wider Surrey Hills AONB.

3.140. In my opinion the urban element of the Appeal Proposal will have a tight relationship with the developed area of Haslemere and a visual relationship is not necessary and potentially detrimental.

Haslemere Neighbourhood Plan H9

3.141. WBC reasons for refusal references the following policies from the Haslemere Neighbourhood Plan (**Core Document 6.3**):

H9.1 Development proposals will be supported where they conserve and enhance trees, hedgerows and woodlands of value.

3.142. Overall, the scheme does comply with this, particularly in bringing Red Court woods into positive management and retention of the majority of trees and hedges within the site. The exception is the tree loss arising due to the proposed Midhurst Road access, but adequate compensation is provided in the form of new tree planting as described and evaluated in the previous section.

H9.2 Development proposals should avoid damage to or loss of mature or semi-mature trees of value other than in exceptional circumstances.

3.143. Aside from the loss of trees along the Midhurst Road junction the scheme avoids damage or loss to the majority of trees and hedges on the Site. The majority of trees lost are either U or C category trees. No A category trees will be removed.

H9.3 Development proposals that add, retain and protect substantial native hedgerows of value will be supported. Landscape proposals that retain ‘important’ hedgerows within areas of public open spaces, will be supported, in order that the hedge’s integrity can be maintained by the responsible maintenance agency.

3.144. The scheme complies with this.

H9.4 Development proposals that affect trees, hedgerows or woodland of value should demonstrate they have been informed by a full site survey conducted by a qualified arboriculturist or ecologist, and include a management plan etc.

3.145. This is provided.

H9.4 The application should contain a detailed Landscaping Plan, including the type, age and proposed location of any new trees to be established on the site. This plan should set out the canopy cover that will be achieved once the trees reach maturity and how long this is expected to take. The canopy at maturity should be at least 25%. The Plan should also set out the soil volume each tree will require in order to achieve the proposed canopy cover and how the soil volume will be achieved.

3.146. The trees within the detailed part of the application will all be planted in open ground and will not be restricted by an urban environment and so adequate rooting areas will be available. The phrase “the canopy at maturity should be at least 25%” is

ambiguous. Clearly, if you take the development area as a whole, the area covered by tree canopy will exceed 25%. If the NP is referring just to the urban area, then this can be demonstrated through the detailed application for the urban area and is not needed now. In my opinion the Appeal Proposal complies with this requirement.

H9.5 Development proposals should demonstrate that appropriate protection measures are in place prior to any work on site and throughout the development process, and that suitable opportunities for the restoration, enhancement or planting of trees, woodland, and hedgerows are identified and incorporated.

- 3.147. This is provided within the Arboriculture reports. In my opinion the Appeal Proposal is compliant.

H9.6 Where intentional or accidental loss of or damage to trees, woodland or hedgerows occurs prior to or during development of any site, appropriate replacement or compensatory planting will be required.

- 3.148. This policy relates to post consent, but the Appeal Proposal can comply with this.

H9.7 Developments of 10 or more dwellings and developments with significant areas of communal land or particularly important planting will be required to make appropriate provision for future management and maintenance of the communal areas including trees and hedgerows.

- 3.149. The various management plans will be conditioned and subject to negotiations with WBC, approved and so the Appeal Proposal will be compliant.

4 COMPARISONS OF THE APPEAL PROPOSAL WITH ALTERNATIVE SITES WHICH COULD ALSO, POTENTIALLY, CONTRIBUTE TO HOUSING NEED

- 4.1. This exercise has been undertaken to contribute to satisfying section b) of para 177 which requires:

“the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way” to be considered”.

- 4.2. The Appellant has been monitoring which sites within WBC might potentially deliver housing within the plan period and this is set out in the evidence given by Mr David Neame but for completeness we have also assessed relevant sites near Haslemere that were initially promoted and then dropped, either because they have been taken to their final planning conclusion and failed or are yet to be allocated for development. The potential sites within WBC are presented in **Figure 21** and potential site around Haslemere are located on **Figure 22**. Sites are individually assessed within **Figure 23**. The sites comprise known promotions, or applications, not yet with the benefit of planning permission at 1st April 2023. The list does include the Royal School (Hindhead) and Secretts Farm (Milford) – both of which comprised part of the alternative site assessments presented with the original application, and both of which are now LPP2 allocations.

- 4.3. For the purposes of this assessment, a review of all the potential sites within the Borough (whether in the AONB, Green Belt or not), which are capable of delivering a

quantum of 50 or more units has been undertaken. For clarity, this analysis includes sites that have no planning status, but are known promotions or are draft allocations, some of which were not pursued further through the local plan process. This is to ensure the assessment is as comprehensive as possible and as such, several sites assessed have no planning status. In addition, and for the avoidance of doubt, it is assumed that developments benefiting from planning permissions granted are deliverable on those sites for the purposes of this report and therefore are excluded from this assessment.

- 4.4. There are no policy nor legal requirements which define how alternative sites should be assessed. In this case, the Appellant feels it entirely reasonable to only assess sites which can achieve some or all that the Appeal Proposal can offer. A fine grain assessment of smaller sites would be impractical as none of these could accommodate anywhere near the quantum of development / community uses and SANGs.
- 4.5. The potentially most credible sites are listed in **Table 6** while those “rejected as unsuitable” in the 2020 LAA and which are not actively being promoted are not included. To prepare the list, a larger number of potential sites has been assessed in terms of planning status and delivery. These are numbered 1 to 42 in the analysis spreadsheet within David Neame’s evidence. – these are not sequentially numbered. Where there is a third-party reference, such as in a published planning document, this is given.
- 4.6. A high-level landscape review has been prepared for each of the sites identified in **Table 6**. For each of the sites, a sheet assessing the landscape constraints and opportunities has been produced (**Figure 23**).
- 4.7. The sites have been given a score out of a range of 1 – 6 in relation to the landscape and visual opportunities and constraints with a score of 1 representing a site that is likely to be acceptable due to very few landscape and visual adverse effects and 6, a site that is likely to be considered unacceptable due to significant adverse landscape and visual effects. Assessment has been largely made on the judgement of an experienced landscape professional. They are high level assessments because often no details as to how the sites would be developed are available and access to the land is not possible. The assessments focus on designations, land cover and topography, potential visibility within the AONB. A visit has been made to each of the green field sites and a photograph taken to illustrate landscape character.
- 4.8. For completeness and to take account of the previous exceptional circumstances exercise undertaken for the Sturt Farm decision (discussed below), land at Longdene, Woolmer Hill and Kingfisher Farm has been analysed, as this is previously promoted LAA land around Haslemere. In the absence of any other comparable sites in Haslemere it is necessary to assess sites elsewhere within the Borough including those outside of and in the AONB.
- 4.9. Therefore, the analysis includes the remainder of the Borough within and outside of the AONB.
- 4.10. **Table 6** provides the summary of the landscape assessment results, with the detailed proforma’s to follow. The urban brownfield sites free from Green Belt, AONB and

Figure 21: Potential development sites within Waverley Borough

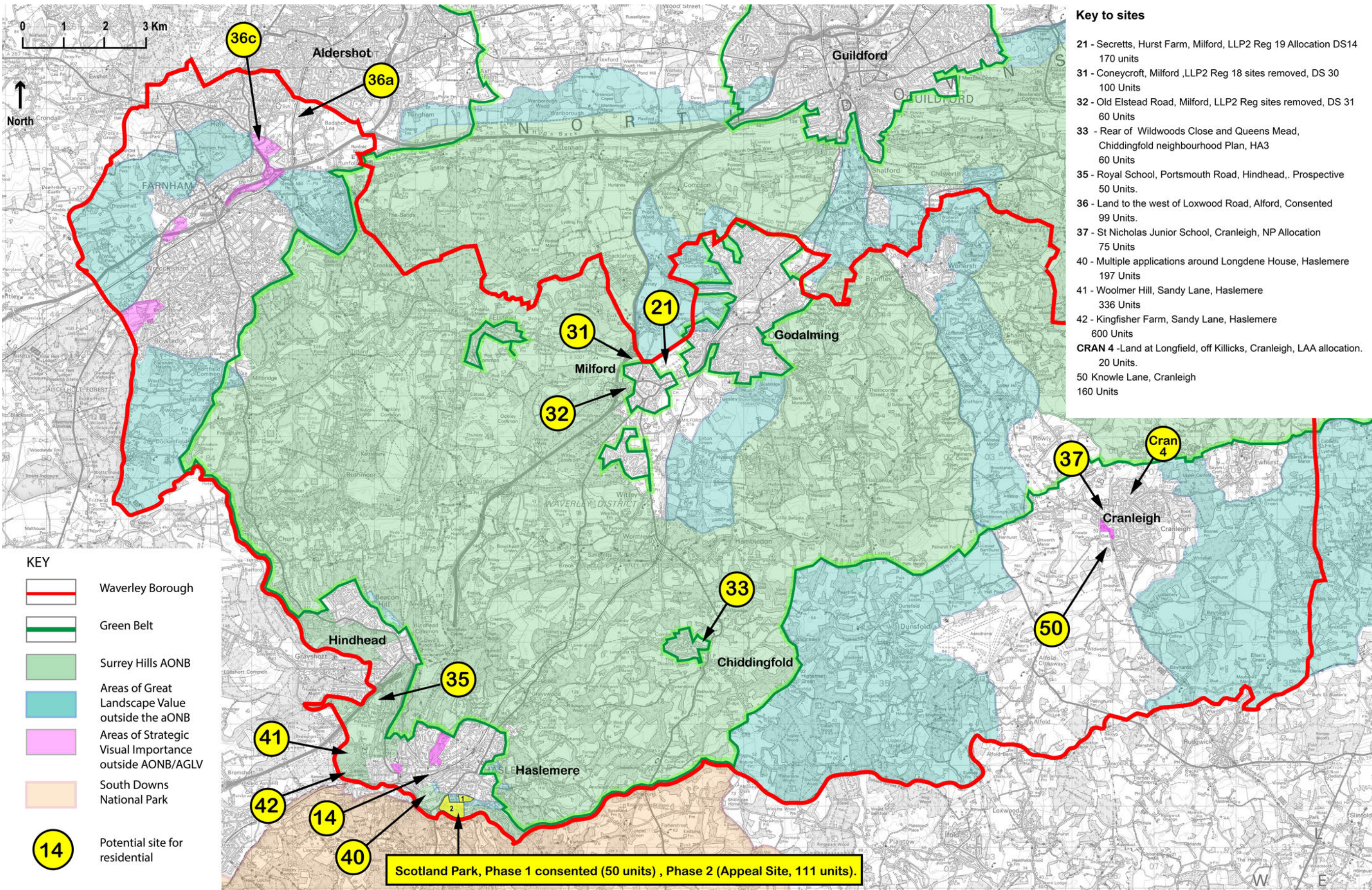


Figure 22: Potential alternative development sites close to Haslemere

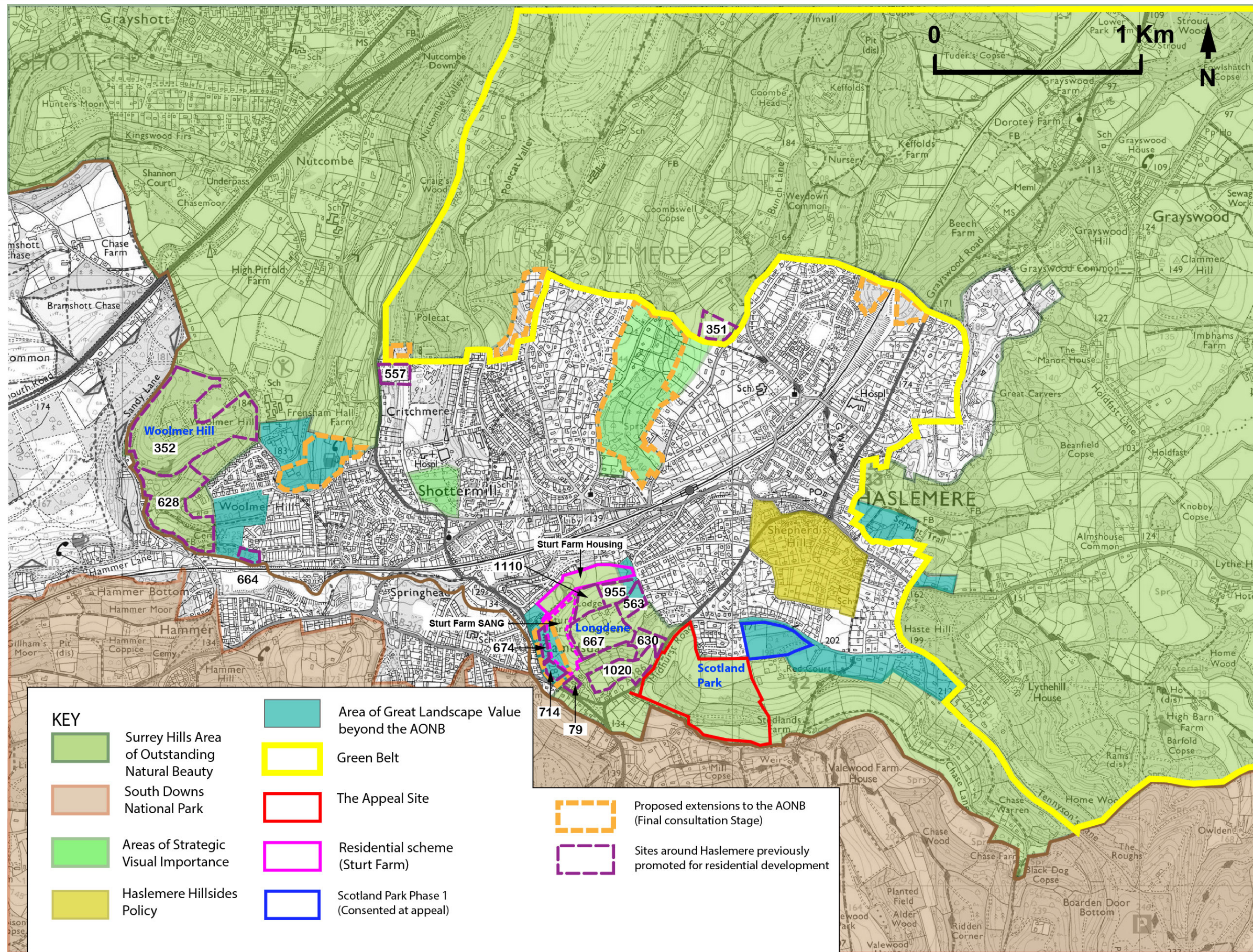




Figure 23: Landscape Assessment of potential development sites within Waverley Borough

Sites within the SHAONB

The Appeal Site	
Address:	Land at Scotland Lane/Midhurst Road
Planning ref:	
Prospective Planning status:	Prospective
Grid Reference:	SU 89993 32073
Area:	28.3 Ha.
Includes SANG:	Yes, and potential for strategic SANG
Potential number of units and type:	Up to 111 mixed housing types
Within AONB:	Yes
Within AGLV:	No
Within Green Belt:	No
Distance from Haslemere town centre:	0.9 Km
Landscape score:	Reasoning: A green field site adjoining the southern edge of Haslemere, within the AONB. The proposed main development areas are afforded good visual enclosure by adjacent housing and existing tree cover and in this respect and in terms of landscape character is not significantly different to an adjacent field in Scotland Park Phase 1 where consent for residential development has been granted at appeal. The main impact to the wider AONB will be creation of the access from the Midhurst Road, but this can be mitigated.
4	



Land at Coneycroft, Milford

Site 31	
Address:	Land at Coneycroft, Milford
Planning ref:	DS30
Planning status:	Former LPP2 Reg 18 allocation
Grid Reference:	SU 94318 42907
Area:	3.7 hectares
Includes SANG:	No
Potential number of units and type:	100 mixed
Within AONB:	Yes
Within AGLV:	No
Within Green Belt:	Yes
Distance from Haslemere town centre:	10.3 Km
Assessment:	Green field site within the Green Belt and AONB. Potential loss of openness. Development will extend the village right up to the A3 junction, adversely affecting the traveller's perception of passing through an attractive landscape of trees and woodland. Increased urbanisation of an important gateway into the AONB. Erosion of the rural setting/green buffer to the village since it will take the urban edge tight against the A3.
Score: 4	



Land at Old Elstead Road, Milford

Site 32		
Address:		
Land at Old Elstead Road, Milford		
Planning ref:		
DS31		
Planning status:		
Former LPP2 Reg 18 allocation		
Grid Reference:		
SU 94211 42456		
Area:		
2.3 hectares		
Includes SANG:		
No		
Potential number of units and type:		
60 mixed		
Within AONB:		
Yes		
Within AGLV:		
No		
Within Green Belt:		
Yes, but removal had been proposed		
Distance from Haslemere town centre:		
10.0 Km		
Assessment: Green field site southwest of Old Elstead Road, Green Belt and within the AONB. Residential buildings to the northwest and southeast. The group immediately to the north includes pair of Grade II Listed buildings. There is an established belt of trees on the boundary fronting Old Elstead Road and mature hedging and trees on the south-eastern boundary. Potential for erosion of the rural setting/green buffer to the village, subject to design.		
Score: 4		

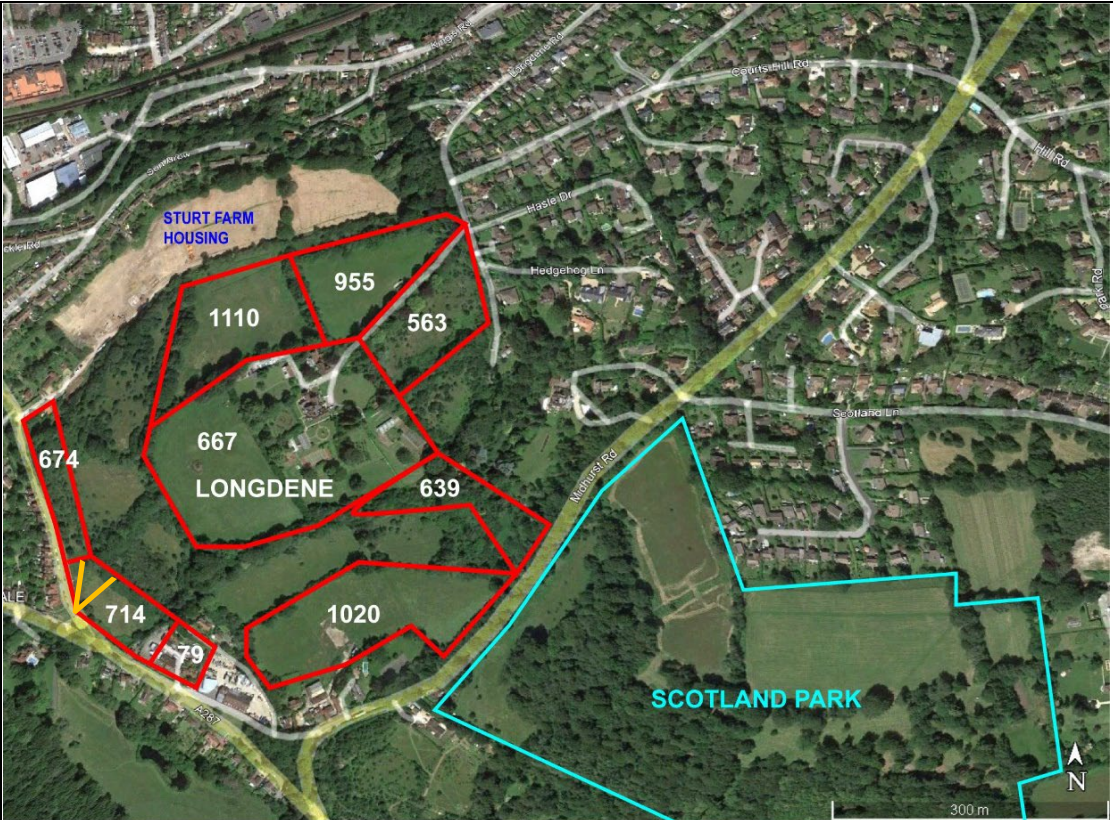

Rear of Wildwood close, Chiddingfold

Site 33		
Address:		
Land to the rear of Wildwood Close and Queens Mean, Chiddingfold		
Planning ref:		
WA/2022/02506		
Planning status:		
Chiddingfold Neighbourhood Plan		
Grid Reference:		
SU 96185 36053		
Area:		
4.4 hectares		
Includes SANG:		
yes		
Potential number of units and type:		
78		
Within AONB:		
Yes		
Within AGLV:		
No		
Within Green Belt:		
No		
Distance from Haslemere town centre:		
6.4 Km		
Reasoning:		
A green field site within the AONB with views in from the Petworth Road, but adjacent to the existing settlement. It will be a noticeable urban expansion of the village on approaching from the Petworth Road since it is located in fairly open countryside. Provision includes a separate application for an extensive area of SANG. Application for 78 dwellings consented in October 2023.		




The Royal Junior School, Portsmouth Road, Hindhead

Site 35		
Address:		
The Royal Junior School, Portsmouth Road, Hindhead		
Planning ref:		
DS 06		
Planning status:		
LPP2 allocation		
Grid Reference:		
SU 88074 34666		
Area:		
Cir. 9.6 hectares		
Includes SANG:		
Difficult to provide on this site.		
Potential number of units and type:		
90		
Within AONB:		
Yes		
Within AGLV:		
No		
Within Green Belt:		
No		
Distance from Haslemere town centre:		
2.5 Km		
Assessment: Outside a settlement boundary and within the AONB and AGLV. Although presented as a brownfield site a significant proportion of the site is playing fields and woodland. Urbanisation of a gateway into the AONB via the A3 and will cause the coalescence of the hamlet of Nutcombe with Grayshott resulting in a loss of character. No SANG provision agreed with NE. Development will result in the loss of the existing sports fields with no replacement proposed. Important gateway location into the AONB from the A3. Potential landscape and visual impacts at the Farnham relocation site which is in the AONB and by the SPA.		
Score: 4		




Longdene Fields

Site 40		
Address: Hedgehog Lane, Haslemere		
Planning ref: 79,563,630, 664, 674,714,955,1110, 1020		
Planning status: Prospective or failed at appeal apart from apartment conversion of Longdene House		
Grid Reference: SU 89381 32276		
Area: 24 hectares		
Includes SANG: no information		
Potential number of units and type: Up to 197		
Within AONB: Yes (a small area lies outside but is a candidate extension area		
Within AGLV: A small area of plots 563 and 955		
Within Green Belt: No		
Distance from Haslemere town centre: 750m		
Assessment: Multiple green field sites promoting development around Longdene House and along the A287 and Sturt Road. Main development proposals in fields around the house have been dismissed at appeal, largely due to the effect on the setting and grounds of the house and other landscape impacts. Development confined to conversion of buildings within the core grounds. Steep side slopes facing the SDNP and high tree cover. The timber yard (site 79) would have least landscape effects being PDL.		
Score: 5		

Landscape review of Woolmer Hill, Sandy Lane

Site 41	
Address: Woolmer Hill Sandy Lane, Haslemere	
Planning ref:	
352	
Planning status:	
Rejected in the 2020 LAA.	
Grid Reference:	
SU 94318 42907	
Area:	
9.8 hectares	
Includes SANG:	
No information but possible given the area	
Potential number of units and type:	
336	
Within AONB:	
Yes	
Within AGLV:	
No	
Within Green Belt:	
No	
Distance from Haslemere town centre:	
2.5km	
Assessment:	
Wooded, natural hillside with very few urban interventions, including roads. Within a rural setting and the AONB. Steep slopes, including some visible from Sandy Lane (see photo), and high tree cover, although clearance of some conifer plantations has recently taken place. Location and topography makes it difficult to create links to Haslemere. It would represent a significant urban intrusion into the countryside. One all the timber crop has been felled it would be an exposed hillside lacking a strong wooded infrastructure in which to locate a settlement. Regenerating heath a potentially attractive and valuable habitat.	
Score: 6	

Landscape review of Kingfisher Farm, Sandy Lane

Site 42	
Address: Kingfisher Farm Sandy Lane, Haslemere	
Planning ref:	
628	
Planning status:	
Rejected in 2020 LAA.	
Grid Reference:	
SU 94211 42456	
Area:	
9.8 hectares	
Includes SANG:	
No information but the size indicates the potential to do so.	
Potential number of units and type:	
600 mixed	
Within AONB:	
Yes	
Within AGLV:	
No	
Within Green Belt:	
Yes, but removal had been proposed	
Distance from Haslemere town centre:	
10.0 Km	
Assessment:	
Within AONB, an attractive valley landscape with numerous water bodies. High tree cover which is an important characteristic of the AONB. Potentially visually enclosed but location and topography makes it difficult to develop and create links into Haslemere. PRoW climbs the ridge on the southern boundary potentially affording views of any development. Potential development areas steeply sloping.	
Score: 6	

Sites outside the SHAONB

Secretts, Milford

Site 21

Address:

Land at Secretts, Hurst Farm, Milford

Planning ref:

WA/2022/02194

Planning status:

LPP2 allocation

Grid Reference:

SU 94847 42461

Area:

13 hectares including land for SANG

Includes SANG:

Yes

Potential number of units and type:

177 dwellings and mixed use

Within AONB:

No

Within AGLV:

No

Within Green Belt:

Yes


Distance from Haslemere town centre:

10.3 Km

Reasoning:

Within the Green Belt, potential loss of openness and a large site a mix of previously developed land (horticultural nursery) and, recreation land. It is compromised by the existence of large glass houses, extensive roads, outside storage areas and hardstanding. Benefits from being immediately adjacent to the edge of the urban area.

Score: 2



Lower Weybourne Lane, Badshot Lea

Site 36a

Address: Lower Weybourne Lane, Bagshot Lea

WA/2022/01433

Planning status:

Appeal Dismissed

Grid Ref: SU 86111 48867

Area:

4.7ha.

SANG: NA

Potential number of units and type:

140 mixed

Within AONB:

No

Within AGLV:

No

Within Green Belt: Yes



Distance from Haslemere town centre:

15.8 km

Reasoning:

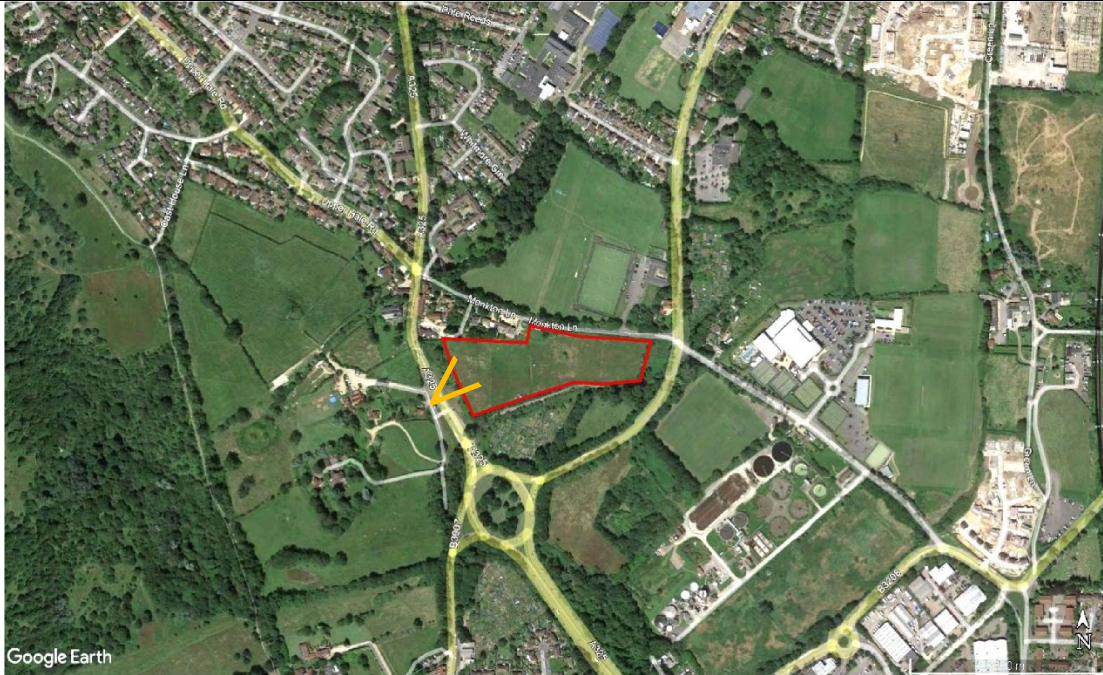

Green Field site, largely within an existing urban area/urban fringe, but some green gap function, visible as open greenfield from Lower Weybourne Lane. Would increase coalescence with Aldershot.

Score 3





61



Monkton House, Monkton Lane, Farnham

Site 36c	
Address:	
Land Rear of Monkton House formerly Bindon House Monkton Lane Farnham	
Planning ref:	
WA/2021/02902	
Planning status:	
Allowed at appeal	
Grid Reference:	
SU 85149 48284	
Area:	
2.3 ha.	
Includes SANG:	
No	
Potential number of units and type:	
56 mixed	
Within AONB:	
No	
Within AGLV:	
No	
Within Green Belt:	
No	
Distance from Haslemere town centre:	
16 Km	
Reasoning:	<p>A gateway site visible from a main road into Farnham and an Area of Strategic Visual Importance although there are proposals to remove this status from the land in LPP2, but not allocate the land for housing. A previous scheme was dismissed at appeal, but the applicant claims the new application overcomes the landscape issues which contributed to the dismissal.</p> <p>Possible cumulative effect with the Hawthorns site which lies nearby, particularly in relation to visual impact and coalescence. Part of the site adversely affected by overhead transmission lines.</p>
Score 3	

Land at Longfield, Cranleigh

CRAN 3	
Address:	
Land at Longfield, off Killicks, Cranleigh	
Planning ref:	
CRAN 3	
Planning status:	
Former Neighbourhood Plan allocation	
Grid Reference:	
TQ 06466 39577	
Area:	
0.38 Ha	
Potential number of units and type:	
20 dwellings	
Includes SANG:	
Not required	
Within AONB:	
No	
Within AGLV	
No	
Within Green Belt:	
No	
Distance from Haslemere town centre:	
17 km	
Reasoning:	<p>The site is within the Cranleigh settlement boundary. It is a former residential care home and the site is surrounded by residential development. The current access is off the B2127 and it is expected that this would also be the point of access for the residential development. The site is within walking distance of the village centre shops and amenities.</p>
Score: 1	

St Nicholas Junior School, Cranleigh

Site 37	
Address:	
St Nicholas Junior School, Cranleigh	
Planning ref:	
CRAN 4	
Planning status:	
Former Neighbourhood Plan allocation	
Grid Reference:	
TQ 05839 39265	
Area:	
1.9 ha.	
Potential number of units and type:	
75 dwellings	
Includes SANG:	
Not required	
Within AONB:	
No	
Within AGLV	
No	
Within Green Belt:	
No	
Distance from Haslemere town centre:	
16.5 k	
Reasoning:	
The site is within the Cranleigh settlement boundary. It is a former Junior School and the site is within the urban area. Development must ensure that it does not have a detrimental impact on the setting of the Cranleigh Conservation Area, the Grade II* listed St Nicolas Church and Buildings of Local Merit - the Moat House and Manns Department store (incorporating Cromwell Cottage). The site is within walking distance of the village centre shops and amenities.	
Score: 1	

Knowle Lane, Cranleigh

Site 50	
Address: Knowle Lane Cranleigh	
Planning ref: WA/2023/00294	
Planning status: Refused and Appeal made.	
Grid Reference: 505938 138328	
Area: 11 hectares	
SANG not required	
Potential number of units and type: Up to 162	
Within AONB: Yes (a small area lies outside but is a candidate extension area)	
Within AGLV: No	
Within Green Belt: No, a small part within ASVI	
Distance from Haslemere town centre: 16.45Km	
Assessment: A green field site with some visual enclosure from trees and not within a designated landscape. Decision letter states that it "would result in significant harm to the character and appearance of an area of valued landscape. It would be poorly related to the settlement of Cranleigh and would be an irregular and disjointed intrusion into the open countryside. The development would result in harm to character of Knowle Lane and the local settlement pattern. Due to the close proximity of the proposed development, the scheme would not preserve or enhance the character or appearance of West Barn and The Brew Grade II Listed Buildings and would therefore cause less than substantial harm to their significance; the public benefits of the proposed development do not sufficiently outweigh the harm caused to the heritage assets". It will not offer other benefits such as Scouts, SANG, Forest School or woodland restoration. Trees will be lost to create the access in	

Score: 4

AGLV constraints are the least constrained in terms of landscape issues, thus scoring 1. Green Field sites outside the AONB or AGLV, but at prominent edge of settlement locations typically score 3 (such as 36a, 36b, 36c). A second issue with 36a, 36b and 36c is that they are some of the few green field areas left between Farnham, Aldershot and Hale with a potential significant cumulative effect if two or all are developed.

- 4.11. The land at Secretts, Milford is the next least constrained, scoring 2 (although is a mix of previously developed land and fields (and was within Green Belt before its allocation in LPP2). As it is now allocated – it is now questionable whether it forms a reasonable alternative.
- 4.12. The five sites within the AONB are all rated 4, but for different reasons. For example, while the Royal High School grounds are partially developed, a substantial area is open greenery including sports pitches, which would be lost if the number of dwellings allocated is to be achieved. Development of the whole site will have a substantial adverse effect on the character of Nutcombe and will result in its coalescence with Grayshott. The site is also, a gateway entrance to the AONB from the A3. Provision of SANG will be difficult and the landscape and visual impacts associated with relocating the school to the Farnham Lane site, which is also within the AONB, also need to be considered. The Appeal Proposal will be visually discreet and will require a new access, with some resulting impacts, but will not a result in coalescence or have any significant effects on the setting of the town.
- 4.13. Three of the sites within the AONB are rated 6, those at Longdene, Woolmer Hill and Kingfisher Hill. These were included within the Exceptional Circumstances assessment for the Sturt Farm Application.
- 4.14. Currently the AONB landscape at Milford forms part of the northwest setting of the settlement and the loss of green fields to development associated with land at Coneycroft and Old Elstead Road will substantially erode this as well as adversely affecting the landscape character of this AONB gateway location. These sites at Milford were not chosen for allocation in LPP2.
- 4.15. The Site at Chiddingfold is a large edge of settlement site with space to accommodate suitable green infrastructure like the Appeal Proposal. It also requires the construction of a new access from an A road with loss of roadside vegetation. It will occupy a prominent location adjacent to the Petworth Road, affecting the setting and character of the settlement. It is rated 5 but has a resolution to grant consent (**Core Document 11.3**).
- 4.16. While the sites within the AONB all score 4 and 6, the Appeal proposal is the only one which can offer substantial community benefits associated with landscape and recreation as well as providing an extensive area of SANG.

Table 6: Landscape opportunities and constraints associated with potential development sites within the borough, with rankings based on landscape and visual issues

Site		Score	Main limitations and benefits
Sites in rest of the borough within the AONB			
The Appeal Site	Scotland Park, Scotland Lane, Midhurst Road, Haslemere.	4	Within AONB but the proposed main urban area is visually well contained. Ability to provide wide benefits to the community such as the Scout Facility, Forest School, SANG (with capacity for use by other developments), nature reserve and public open space. Over seventy percent of the landscape will be retained as green space, acting both as a landscape buffer to the SDNP and as a means of accessing the SDNP; all subject to a management plan which will ensure its preservation and enhancement.
31	Land at Coneycroft, Milford.	4	Within AONB and Green Belt, unlikely to provide SANG, distant from Haslemere. Not allocated in LPP2.
32	Land at Old Elstead Road, Milford	4	Within AONB and Green Belt, unlikely to provide SANG, distant from Haslemere. Not allocated in LPP2.
33	Land to the rear of Wildwood Close and Queens Mead, Chiddingfold.	5	Within AONB, distant from Haslemere. Within open countryside. Visible from the Petworth Road. Roadside woody vegetation loss required to create an access. Limited landscape restoration benefits, no community facilities provided such as a forest school or scouts. The site now benefits from a resolution to grant planning permission..
35	The Royal High School, Portsmouth Rd, Hindhead	4	Less sustainably located with respect to Haslemere. Within AONB, unlikely to provide SANG. LPP2 allocation.
40	Longdene Area	6	Within the AONB, prominent hillside, potential effects on the setting of Longdene House (Listed). Past planning promotion.
41	Woolmer Hill	6	Within AONB, prominent hillside, access difficult and distant from Haslemere. Past planning promotion.
42	Kingfisher Farm	6	Within the AONB, steep, wooded, prominent hillside. Past planning promotion.
Sites within the rest of the Borough outside the AONB			
5	Centrum Business Park, Farnham.	1	Likely to be mainly apartments, distant from Haslemere
21	Land at Secretts, Hurst Farm, Milford.	2	Large, offering a full range of dwelling sizes. Previously developed land formally within Green Belt with a loss of openness. Can provide SANG. Distant from Haslemere. Now forms a LPP2 allocation. It has a resolution to grant.
CRAN 3	Land at Longfield, off Killicks,	1	The site is within the Cranleigh settlement boundary. It is a former residential care home

	Cranleigh		and the site is surrounded by residential development.
36a	Lower Weybourne Lane, Badshot	3	Urban fringe location within a gap between Badshot and Aldershot. Recently refused at appeal.
36c	Monkton House, Monkton Lane Farnham	3	Prominent gateway location with potential cumulative impact with Hawthorns (consented on appeal) At 1st April 2023, live application to be subject to a planning appeal. Consent subsequently granted at appeal.
37	St Nicholas Junior School, Cranleigh	1	The site is within the Cranleigh settlement boundary. It is a former Junior School and the site is within the urban area.
50	Knowle Lane Cranleigh	4	Unallocated green field site, outside settlement boundary, numerous issues such as adverse effect on landscape and the setting of listed buildings, connectivity to Cranleigh. Does not offer other benefits such as Scots facility, Forest School or extensive landscape restoration.

- 4.17. I conclude that while the smaller potential development sites on previously developed land are preferable to developing on green field sites, the majority of the remainder have similar characteristics to the Appeal Site, being largely green field with strong wooded enclosure; but none offer the extent of benefits offered by the Appeal Proposal to fully offset harms. The Longdene, Woolmer Hill and Kingfisher Farm sites are in my opinion, likely to result in far greater landscape and visual effects than the Appeal Proposal, although I accept that in the absence of any detailed masterplans a fully accurate assessment cannot be made other than a broad brush assessment that to accommodate an equivalent 100+ dwellings on those sites without significant adverse effects would be challenging, aside from issues such as ecology and sustainable transport links.
- 4.18. There are many parallels similarities between the Appeal Proposal and Site 33 at Chiddingfold which has a resolution to grant planning permission, and lies within the Surrey Hills AONB, requiring a new access off an A road with loss of roadside vegetation and within fields adjacent to a settlement. Site 33 does not benefit from the same level of visual enclosure and does not offer the extent of landscape restoration or provide facilities to engage young people in the natural world, links to the SDNP etc.
- 4.19. It is evident that there are few sites preferable to the Appeal Proposal in terms of landscape and visual considerations, within a borough where landscape designations are likely to become more constraining, the potential extension to the Surrey Hills AONB being an example. In terms of landscape and visual considerations I believe that the Appeal Proposal is the only site remaining that can provide meaningful housing numbers immediately adjacent to the urban edge of the Haslemere.

5 CONCLUSION

- 5.1. Green Belt and protective landscape designations significantly limit the availability of development sites that can deliver meaningful housing provision within Waverley Borough, if they are to be unconstrained by designation. If the proposed extensions to the Surrey Hills AONB become formalised the area of unconstrained land will reduce. Consideration should be given to developing sites within the AONB that have acceptable landscape and visual effects. Para 117 states, major development within the AONB is possible if any detrimental effects on the environment, the landscape and recreational opportunities can be moderated, and the residual effects weighed against wider benefits (and criteria a) and b) are also met). AONBs were established to benefit the population and the ecosystems in them, and against this objective, the use of around three quarters of the Appeal Site for recreation, learning and habitat enhancement is of significant benefit.
- 5.2. While the Appeal Proposal will result in some detrimental landscape and visual effects they will be largely confined to the Developed Area, with benefits to the Wider Landholding and limited effects on the SHAONB beyond the Appeal Site. There will be no adverse effects on the setting of the SDNP.
- 5.3. The proposed works to construct the access from the Midhurst Road will have a detrimental effect on landscape character and visual amenity, but these can be sufficiently mitigated. The minimal residual effects following mitigation should be balanced against the substantial landscape, biodiversity and recreational benefits afforded by the remainder of the Site. In accordance with paragraph 177 of the NPPF, this scheme offers real and tangible public benefits in the public interest.
- 5.4. For the reasons stated above it is my view that on landscape and visual grounds there are no substantive reasons for refusing planning permission for the proposed residential scheme on land adjacent to the Midhurst Road, Haslemere. Therefore, the Inspector is respectfully requested to uphold the scheme and allow the grant of planning permission so far as landscape and visual issues are concerned.