



**Chartered Landscape Architects**

The Studio, 57 Lime Grove  
New Malden, Surrey KT3 3TP

T: 020 8949 0803

E: [mail@petrow-harley.com](mailto:mail@petrow-harley.com)

**Landscape Proof of Evidence in support of  
the refusal by Waverley Borough Council in relation to refusal of planning  
application for:**

**Land off Midhurst Road at Scotland Park, (Land Centred Co-ordinates 489803  
131978) Midhurst Road, Haslemere, Surrey, GU27 3DH**

**Hybrid application consisting of an Outline application (all matters reserved except access) for up to 111 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).**

**Proof of evidence on Landscape and Visual Effects**

**Robert Petrow dated November 2023**

**Our Ref: 1038/RP Rev A**

**Council Reference: WA/2022/01887**

**Appeal Reference: APP/R3650/W/23/3327643**

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## 1.0 INTRODUCTION

1.1 My name is Robert Petrow. I am a Chartered Landscape Architect and the Managing Director of Petrow Harley Limited. I am instructed to present evidence at this inquiry by Waverley Borough Council on Landscape and Visual Effects.

1.2 This appeal is against the refusal for Application: WA/2022/01887 by Waverley Borough Council as Local Planning Authority under delegated powers on 2nd May 2023 for the following 6 reasons:

1) Reason:

*The proposal would fail to preserve and enhance the landscape and scenic beauty of the AONB and the setting of the South Downs National Park and would result in major development that would harm the landscape character, without exceptional circumstances. The quantum of development would also harm the intrinsic character and beauty of the Countryside. 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 National Planning Policy Framework.*

2) Reason:

*The ecological information submitted with the application fails to demonstrate that the proposed development would not negatively affect and/or fragment the wildlife corridors adjacent to Midhurst Road and within the northern central area of the application site. Additionally, the ecological information fails to demonstrate that there would not be a detrimental impact on protected species being great crested newts, hazel dormice and bat species, and Habitats of Principal Importance. The proposal is contrary to Policy NE1 of the Local Plan Part 1 (2018), Policy DM1 of the Local Plan Part 2 (2023), Policy H12 of the Haslemere Neighbourhood Plan and paragraphs 174 and 179 of the National Planning Policy Framework.*

3) Reason:

*In the absence of an agreed tenure mix and appropriate legal agreement to secure the provision of affordable housing within the meaning of the NPPF, appropriate to meet Waverley Borough Council's housing need, the proposal fails to create a sustainable, inclusive and mixed community, contrary to Policy AHN1 of the Local Plan Part 1 (2018), Policy H4 of the Haslemere Neighbourhood Plan and paragraph 64 of the National Planning Policy Framework.*

4) Reason:

*The applicant has failed to enter into an appropriate legal agreement to secure the delivery, maintenance and management of the onsite SANG. The proposal would have a likely adverse effect on the integrity of the Wealden Heaths Special Protection Area (SPA). The proposal conflicts with Policies NE1 and NE3 of the Local Plan (Part 1) 2018, Policy DM1 of the Local Plan (Part 2) 2023, Policy H12 of the Haslemere Neighbourhood Plan, the adopted*

*Avoidance Strategy and paragraph 180 of the National Planning Policy Framework.*

5) Reason:

*In the absence of an appropriate legal agreement to secure the contributions towards upgrading of the Rights of Way network within the vicinity of the site, the provision of funding in respect of the future monitoring of the Travel Plan, and the provision by the County Council of a Demand Responsive Bus Service, the proposal would fail to maximise opportunities for sustainable travel in conflict with Policy ST1 of the Local Plan 2018 (Part 1), Policy DM9 of the Local Plan 2023 (Part 2), Policy H7 of the Haslemere Neighbourhood Plan and paragraph 110 of the National Planning Policy Framework.*

6) Reason:

*In the absence of an updated Road Safety Audit and associated off site works there would be insufficient provision for off-site highways safety mitigation works to adequately accommodate the proposed development, contrary to Policy ST1 of the Local Plan 2018 (Part 1), Policy DM9 of the Local Plan 2023 (Part 2), Policy H7 of the Haslemere Neighbourhood Plan and paragraphs 110 and 111 of the National Planning Policy Framework.*

- 1.3 My evidence addresses the Landscape and Visual Effects of the proposed development (reason for refusal 1) and considers the following key issues in relation to these effects of the development as follows:

- Landscape and Visual effects on the Area of Outstanding Natural Beauty (AONB);
- Effect on adjacent dwellings;
- Effect on adjacent public open spaces and rights of way.

In addition, I have prepared the following information in support of this appeal:

- A review of Chapter 10 of the Environmental Statement Landscape and Visual produced by Sightline Landscape Ltd and Visual Assessment (LVIA addendum) also produced by Sightline Landscape Ltd, dated February 2023.

- 1.4 I hold a National Certificate and National Diploma in Horticulture from Merrist Wood College. A Bachelor of Arts Honours Degree and Post Graduate Honours Diploma in Landscape Architecture from Greenwich University. I am a Chartered Member of the Landscape Institute.
- 1.5 I have over 30 years' experience in landscape design starting as a landscape foreman for Squires Landscape before becoming a Landscape Manager at Fulham Place. After this I was employed as a landscape assistant at Boyer Design a senior landscape architect at Kelsey Associates and a senior consultant at ADAS. I established Petrow Harley in 2011 of which I am now the Managing Director.

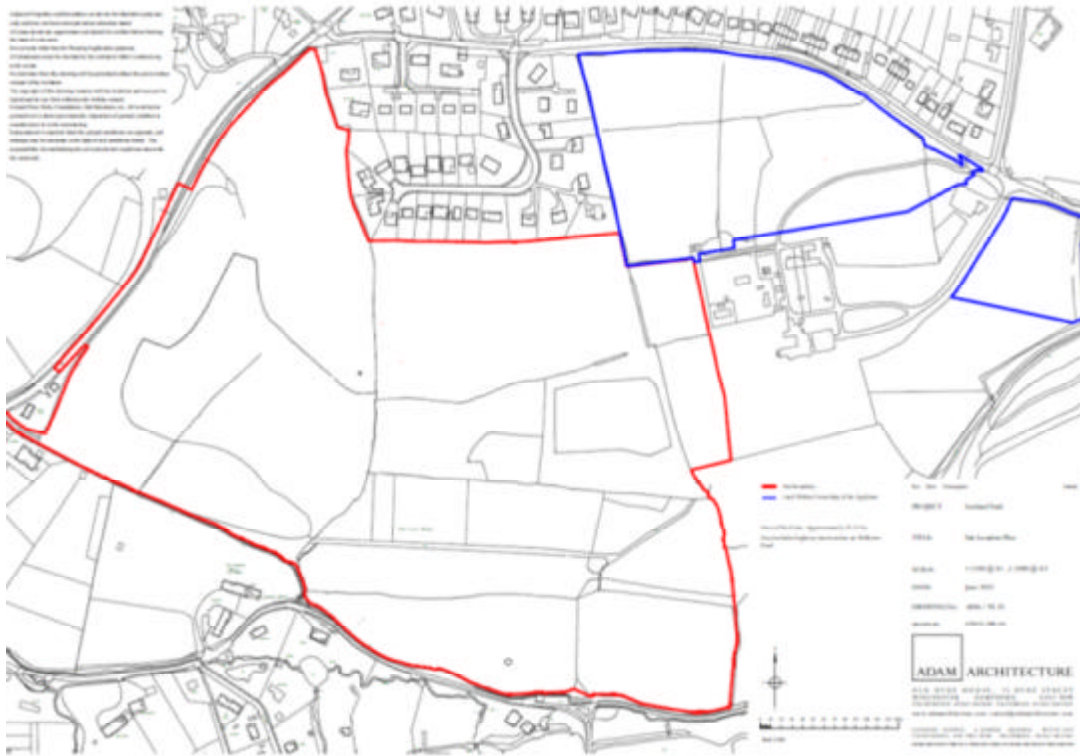
- 1.6 Petrow Harley is an independent practice of Chartered Landscape Architects working for both private and local authority clients. We have now completed over 1,000 projects working on a range of schemes including Park and Open Spaces, Schools, Housing schemes, Renewable Energy and Leisure schemes.
- 1.7 I have visited the site and walked the surrounding areas including all local open spaces and public rights of way. My statement has been carried out in compliance with The Landscape Institute's 'Code of Standards of Conduct and Practice for Landscape Professionals'. I confirm that the opinions expressed are my true and professional opinion.

## **2.0 THE APPEAL SITE**

- 2.1 The site measures approximately 23.3 hectares comprising three paddocks in the northern part of the site, and then slopes down steeply to the south and the west which comprises parkland, woodland (Red Court Woods) and fields.
- 2.2 The Site is located approximately 850m to the southwest of Haslemere town centre. Residential properties fronting Scotland Lane, Scotland Close and Chiltern Close are located immediately to the north and east of the Site. To the south, off Bell Vale Lane, are further residential properties. The wider area to the south is predominately agricultural fields and woodland with smaller settlements situated in the wider rural landscape.
- 2.3 To the east is parkland and agricultural land associated with Red Court (a Grade II listed late Victorian country house located approximately 50m of the Site). An area of housing for 50 new homes (Land at Scotland Lane allowed on appeal) is currently under construction to the north of the site.
- 2.4 The site is wholly located within the Surrey Hills Area of Outstanding Natural Beauty (AONB) and is situated immediately to the north of the boundary of the South Downs National Park (SDNP) and in the Countryside beyond the Green Belt for the purposes of policy RE1. It is currently accessed via Scotland Lane by way of an existing private track through the adjoining development site.
- 2.5 An AONB is a designated exceptional landscape whose distinctive character and natural beauty are precious enough to be safeguarded in the national interest. They are protected and enhanced for nature, people, business, and culture. The prime purpose of the AONB designation is to conserve and enhance the natural and scenic beauty of the landscape. This is reflected in the fundamental role of the local planning authorities, which is to ensure that the very features that make the Surrey Hills special and worthy of its designation are protected. This is achieved by legislation, strict development plan policies and through the vigilant exercise of development management powers. The Surrey Hills Management Plan seeks to ensure that these are applied in a consistent manner across the nationally important landscape. Development proposals should consider any Landscape Character Assessments for the locality and the Surrey Hills Management Plan (Core document 7.9).
- 2.6 The Development Proposals include a full planning application for:
  - i) Junction alteration from Midhurst Road, one dwelling, a car park, associated landscape, drainage, and associated access road to serve the development (including the diversion of a public footpath);
  - ii) The erection of a scout facility (Use Class F and an education facility (Use Class F);

iii) Suitable Alternative Natural Greenspace (SANG).

The application is outline (all matters reserved except access) for up to 111 residential dwellings accessed from the proposed access road (linking to Midhurst Road), incorporating associated landscaping, restricted access for emergency access, community growing space, associated infrastructure, including green infrastructure.



*Fig 1: Site Location*

### 3.0 REVIEW OF SUBMITTED LANDSCAPE CHARACTER AND VISUAL ASSESSMENT

3.1 Sightline Landscape Ltd have produced a Landscape and Visual Impact Assessment (LVIA) [Core Document 2.29 and addendum Core Document 2.44] which assesses the impact of the development proposals upon the existing landscape character as well as visual changes arising from it. I largely agree with the methodology and the landscape character units identified. There is however disagreement on the value and quality of the landscape areas proposed for housing development and proposed road and the affects upon the landscape at a local level and upon the wider AONB.

#### 3.2 **Base line**

3.2.1 At a broad scale the Site lies within the Landscape Character Area GW5 - Hindhead Wooded Greens and Hills prepared by Hankinson Duckett Associates (HDA), on behalf of Surrey County Council and the Surrey Planning Officers Association (SPOA) dated April 2015 [CD 7.10].

It is defined as a broad area which wraps around Haslemere, Greyshot and Hindhead and Beacon Hill, at the south-western edge of the County. The area is defined by the settlement edges to the south and west, the extent of underlying greensand to the east and the transition to lower, open greensand hills to the north. Of note is that the character area is within the Surrey Hills AONB. This study makes the following recommendations:

### 3.2.2 **Landscape Guidelines (taken from Surrey Landscape Character Assessment pages 68-69)**

#### ***“Land Management***

- Encourage landowners to maintain an appropriate management regime using traditional farming techniques where these will conserve and enhance key landscape features such as the woodlands, heathland, common, pastures, species rich chalk grassland, hedgerows, and parkland. Conserve the heathland habitats, preventing further encroachment by woodland and taking opportunities to restore and extend these habitats.
  - Enhance or connect fragmented areas of high biodiversity value or positive landscape attributes through opportunities in landscape restoration or changes in land management. This landscape type coincides with Surrey’s Wealden Greensand biodiversity opportunity area.
  - Encourage consistent management and restocking of hedgerows.
  - Protect sunken lanes
  - Manage trees and woodlands to ensure that key views are retained, such as from Tilburstow Hill.
  - Promote traditional woodland management techniques such as coppicing with local landowners and the farming community where appropriate to maintain the varied character of the woodlands.
  - Encourage understanding and conserve the historic elements of the landscape.
  - Protect and manage beech coppice.
  - Encourage sustainable and multi-purpose woodlands.
  - Promote the use of locally appropriate species such as oaks, Scots pine, alder and yew.
  - Ensure that infrastructure supporting leisure activities (such as car parking, signage, seating and dog bins) is sensitively designed and placed to conserve the rural, undisturbed character of the area.
  - Retain and enhance public rights of way.
  - Encourage sensitive design and management of horse paddocks for instance in retaining hedges and resist development of other facilities such as manèges that would affect the rural character of the area.
  - Seek to conserve and enhance the low key, rural character of the footpaths through the encouragement of appropriate surfacing, materials and signage.
  - Maintain unsettled wooded skyline.
  - Consider mitigation such as woodland planting to reduce the visual impact of quarrying.
- Promote nature conservation on golf courses.

#### ***Built Development***

- Conserve the secluded, largely unsettled landscape.



- Conserve the distinctive pattern and character of existing settlements and historic buildings and their settings.
- Encourage use of traditional building materials and signage, with particular regard to local style and materials. Refer to Surrey design guides; Surrey Design (Surrey Local Government Association) and Building Design in the Surrey Hills (Surrey Hills AONB).
- Conserve the rural roads and sunken lanes minimising small-scale incremental change such as signage, fencing, new domestic access or improvements to the road network which would change their character and take measures to protect the banks of the sunken lanes and the tracks from damage by vehicles.
- Ensure infill development is sensitive to tree lined sunken lane boundaries and conserves and protects the distinct character of the area.
- Conserve and protect the distinct relationship and character between historic cores of towns and villages and the surrounding countryside.
- Conserve areas of undisturbed wooded skyline.
- Ensure that lighting schemes are assessed for visual impact and encourage conservation of the existing 'dark skies' within this sparsely settled area.
- Oppose the erection of further tall structures where they would be visually dominant and aim to utilise existing masts in preference to the erection of new ones. Ensure sympathetic siting and design of new features where erection is necessary.
- Seek to conserve the surrounding character and key landscape features within areas of sand extraction and reinstate landscape elements following restoration of worked sites".

3.2.3 In addition Waverley Borough Council have carried out a Landscape Study – Part 2: Haslemere & Godalming produced by AMEC dated August 2014. The site lies within Segment HE05 (Page 15). The report states that "*Due to existing land use, steep topography and access routes development in this area would be likely to have a negative impact on the landscape character*".

**3.3** The Surrey Landscape Character Assessment is a broad scale assessment and a useful baseline but of limited use in assessing the site itself. A locally based assessment has been carried out by Sightline which divides the site into several areas, and each is given a quality, value, and sensitivity score. I have carried out my own assessment of the areas as below.

### **3.4 Landscape Quality**

Landscape quality is determined using the criteria within the table below.

<b>Landscape Quality</b>	<b>Criteria</b>
<b>High</b>	Typically, designated landscapes including but not limited to World Heritage Site, National Parks, Areas of Outstanding Natural Beauty considered to be an important component of the county's character experience by a high number of people. Landscape character highly distinctive with very few features perceived as either distracting or intrusive. Landscape condition is good, and components are generally well maintained to a high standard. In terms of seclusion enclosure by land use, traffic and movement, light pollution and presence/absence of major infrastructure, the landscape has an elevated of tranquillity. Often attracting visitors for the enjoyment of the landscape. Rare or distinctive landscape elements and features are key components that contribute to the landscape character of the area. High importance and rarity, national scale, and limited potential for substitution.
<b>Medium</b>	Typically, undesignated landscape. Typical of many rural landscapes across the UK. Only occasional detracting or intrusive features. Countryside considered to be a distinctive component of the regional or local landscape character. Landscape condition is fair, and components are generally well maintained. In terms of seclusion, enclosure by land use, traffic and movement, light pollution and presence/ absence of major infrastructure, the landscape has a moderate level of tranquillity. Some rare or distinctive landscape elements and features that contribute to the landscape character of the area. Medium importance and rarity, regional scale, limited potential for substitution.
<b>Low</b>	Undesignated landscape including urban fringe and rural countryside considered to be of unremarkable character and containing detracting elements. Landscape condition may be poor and components poorly maintained or damaged. In term so seclusion enclosure by land use, traffic and movement, light pollution and presence/absence of major infrastructure, the landscape has limited levels of tranquillity. Rare or distinctive elements and features are not notable components that contribute to the landscape character of the area. Loew to medium importance and rarity. Local scale
<b>Negligible</b>	Poor quality, degraded landscape with many detracting or intrusive elements and few positive attributes. Would benefit from comprehensive restoration. Very low importance rarity, local scale.

*Table 1 Landscape Quality*

### **3.5 Landscape Value**

Which can be defined as the relative value that is attached to different landscape by society. A landscape may be valued by different stakeholders for a whole variety of reasons. Each is given a value (High, Medium and Low). Several factors are considered and include: Landscape quality

(condition), scenic quality, rarity, representativeness, conservation interests, recreation value, perceptual aspects and associations.

### 3.6 Landscape Susceptibility

Which can be defined as the ability of a defined landscape to accommodate the specific proposed development without undue negative consequences.

### 3.7 Landscape Sensitivity:

Which is a term applied to specific receptors, combining judgements of the susceptibility of the receptor to the specific type of change or development proposed and the value related to that receptor.”

Sensitivity	Landscape Examples
Low	<p>Typically, an undesignated landscape with some local community importance such as: parks; recreation areas; or the landscape has a value expressed in local publications.</p> <p>Few landscape elements remain intact and in good repair; few buildings and material are in local vernacular. Large-scale landform/land cover/development; featureless; coarse grained; open with broad views</p> <p>Frequent presence of utility, infrastructure or industrial elements; contemporary structures e.g., masts, pylons, cranes, silos and/or industrial sheds that have vertical emphasis; functional, man-made land-use patterns and engineered aspects evident</p> <p>Busy and noisy with obvious human activity and development; prominent movement.</p>
Medium	<p>Typically, a valued landscape of regional or local landscape of conservation importance such as: Special Landscape Areas; and Unregistered Parks and Gardens of Historic Interest</p> <p>Some landscape elements remain intact and in good repair; some building styles/materials are local vernacular Medium-scale landform/land cover/development; textured; semi-enclosed with middle-distance views.</p> <p>Some evidence of man-made elements, which may be partially out of scale with the landscape and may be only partially consistent with vernacular styles.</p> <p>Some noise is evident, but human activity/development is not dominant; noticeable movement</p>
High	<p>Typically, a highly valued landscape of international and/or national landscape or conservation importance such as: National Parks; Areas of Outstanding Natural Beauty; and Registered Parks and Gardens of Historic Interest</p> <p>Most landscape elements remain intact and in good repair and most building styles and materials are local vernacular.</p> <p>Small-scale landform/land cover/development; human-scale indicators; fine grained, enclosed with narrow views; sheltered. Absence of man-made elements; traditional or historic settlements; natural features and natural forms of amenity parkland, perceived as natural “wild land” lacking in man-made features, land-use elements, and detractors.</p> <p>Sense of peace, isolation, or wildness; remote and empty; no evident movement</p>

Table 2: Landscape Sensitivity

### 3.8 The results of my assessment are given below and noted the areas of disagreement.

Landscape Unit	Landscape Quality	Landscape Value	Landscape sensitivity	Notes
Landscape Area 1: Fields adjacent to the Midhurst Road	High	High	High	Sightline assessment quality medium to high
Landscape Area 2: The two northern fields on top of the ridge	High	High	High	Sightline assessment quality medium
Landscape Area 3: The Parkland	High	High	High	My assessment agrees
Landscape Area 4: Red Court Woods	High	High	High	My assessment agrees
Landscape Area 5: Southern Pasture	High	High	High	Sightline assessment quality medium to high due to presence of over head power line. These are timber poles and overhead lines viewed against a treed backdrop and do not significantly devalue the landscape
Landscape Area 6: Coniferous plantation	Low Medium	– Medium	Medium	My assessment agrees
Landscape Area 7: Former tennis court	Low	Low	Low	My assessment agrees

Table 3: Landscape units: Quality, Value and Sensitivity



Figure 2: Landscape Character units taken from Sightline LVIA

## 4.0 Landscape Effects

### 4.1 Development Proposals

The development proposals are described in detail within the LVIA and Design and Access statement. An extract of the proposals is shown below.



*Figure 3: Development Proposals*

In summary the proposals within the site-specific LCAs identified in fig 10.5 LVIA include:

- Landscape Area 1: The construction of a new entrance and access road, required tree removal and associated engineering features from Midhurst Road through Area 1. New tree planting in the southern area (Southwest field).
- Landscape Area 1 and 2: The construction of up to 111 New Dwellings and associated engineering features.
- Landscape Area 3 and 7: The construction of an Earth House on the site of the former tennis court. An equipped children's play area. Paths to provide pedestrian connection and a pond and viewing area south of the former tennis court. The use of the area as informal public open space.
- Landscape Area 4: A new Scout Hut with car and minibus access and new planting. As well as a new Forest School within a natural clearing and management of the woodland.

- Area 5: The creation of a wetland area to receive water runoff from the new areas of housing.
- Area 6: Landscape Management of the woodland.

#### **4.2 Assessment and significance of effects**

Professional judgement has been used to assess the effects upon the receptor by combining judgements about its susceptibility to change arising from the specific proposal with judgements about the value attached to the receptor. This includes combining judgements about matters such as the size and scale of the change, the extent of the area over which it occurs, whether it is reversible or not and whether it is short or long term in duration.

These include:

- the susceptibility of the receptor to the type of change arising from the specific proposal;
- the value attached to the receptor.

The changes are assessed as follows:

#### **4.3 No Change**

- No notable loss or alteration to existing landscape features;
- No notable introduction of new features into the landscape / townscape; and
- Negligible change to the key physical and/or perceptual attributes of the landscape.

#### **Slight Change**

- Minor loss or alteration to existing landscape features;
- Introduction of minor new features into the landscape; and
- Minor alteration to the key physical and/or perceptual attributes of the landscape.

#### **Moderate Change**

- Some notable loss or alteration to existing landscape features;
- Introduction of some notable new features into the landscape; and
- Some notable change to the key physical and/or perceptual attributes of the landscape.

#### **Substantial Change**

- A major or total loss or alteration to existing landscape features;
- Introduction of major or dominant new features into the landscape; and
- A major change to the key physical and/or perceptual attributes of the landscape.

- 4.4 Adverse landscape effects are limited to Landscape areas 1 and 2. It should be noted that this assessment relates to the appeal site only and



consideration needs to be given to the landscape effects upon the wider AONB designation as well.

Potential receptor	Duration Permanent, long-term or short-term	Nature Direct, indirect, secondary or cumulative	Landscape Effects Construction  Substantial, moderate, low or neutral (beneficial or adverse)	Landscape Effects Year 1	Landscape Effects Year 10	Notes
Landscape Area 1: Fields adjacent to the Midhurst Road	Permanent	Direct	Substantial Adverse	Substantial Adverse	Substantial Adverse	The main residential area is located within this area and will entail the building of new dwellings, roads and required engineering works. The landscape effects of new built form within the AONB are permanent and cannot be mitigated
Landscape Area 2: The two northern fields on top of the ridge	Permanent	Direct	Substantial Adverse	Substantial Adverse	Substantial Adverse	The main residential area is located within this area as well as the new access road and required tree removal. These will and will entail the building of new dwellings, roads and required engineering. The landscape effects within the AONB are permanent and cannot be mitigated.
Landscape Area 3: The Parkland	Permanent	Direct	Moderate Adverse	Low Adverse	Neutral	Construction of scout's hut and landscape management of woodland. Landscape management will reduce adverse effects over time
Landscape Area 4: Red Court Woods	Permanent	Direct	Moderate Adverse	Low Adverse	Neutral	Construction of forest school and landscape management of woodland. Landscape management will reduce adverse effects over time
Landscape Area 5: Southern Pasture	Permanent	Direct	Moderate Adverse	Low Adverse	Neutral	Area currently pasture. Creation of wetland nature reserve using water run-off from developed areas.
Landscape Area 6: Coniferous plantation	Permanent	Direct	Moderate beneficial	Moderate beneficial	Moderate beneficial	Management of woodland and introduction of broadleaved species
Landscape Area 7: Former tennis court	Permanent	Direct	Moderate Adverse	Moderate beneficial	Moderate beneficial	Creation of pond and viewing platform. Note small area only.

*Table 4: My assessment of Landscape effects*



#### 4.5 Landscape Characteristics of the area within the AONB.

The Surrey Hills AONB was designated in 1958 and one of the key threats to its natural beauty identified by the Surrey Hills management plan is new housing. The Appeal Site lies within the Wooded Greens Hills and is part of a wider landscape within the southern part of the AONB which marks the boundary between the Greensand and the Low Weald further to the south. These boundaries are based on underlying geology, landform and the wooded land cover which broadly following contours and the edges of woodland blocks.

It is a special and beautiful landscape formed by undulating hills, dominated by woodland, with areas of pasture. Settlements are generally sparsely located with scattered farmsteads and individual buildings along rural lanes.

Roads are incised, sunken, often steep, winding lanes, with exposed roots and sandy soil to roadside banks. Overhanging surrounding tree cover results in a tunnel effect along the lanes.

It is a peaceful, remote landscape with a high sense of enclosure, with contrasting panoramic views out over lower ground which aid the appreciation of the elevated nature of the landscape and its prominence in the local landscape.

It has a historic landscape pattern associated with farming livestock its movement, and woodland management.

The appeal site forms an important and scenic part of the wider AONB. The purpose of an AONB designation is to conserve and enhance the natural beauty of the designated landscape and resist inappropriate development which would erode its special qualities.

#### 4.6 Development Proposals and changes to the AONB

The design proposals include landscape improvements to the south including conifer removal, the planting of new broadleaf trees, the enhancement of grasslands and access improvements as well as a Suitable Alternative Natural Green Space (SANG). These proposals although welcome are aimed at improving community access as well as some beneficial changes to the undeveloped land to the south. In my opinion these are not of enough value to offset the adverse changes to the northern section of the appeal site. It is my view that the development of housing within the northern section of the site which equates to around 22% of the site area will have a significant adverse effect on the landscape character of the site and the wider AONB. As previously stated, these areas are high quality protected landscape. These affects will be permanent and not capable of being mitigated. The improvements to the landscape areas to the south which comprise around 78% of the site involve increased community access and relatively minor benefits to the landscape areas which are also high quality AONB land. These areas are not degraded or detract from the AONB and the changes proposed would not elevate low quality landscape into a higher quality which

might benefit the local and wider AONB quality. Harm arising from the new areas of housing outweighs the minor benefits giving rise to an adverse change in landscape character and quality to the protected AONB.

- 4.7 In addition to the above consideration needs to be given to the landscape effects arising from the required access into the site from Midhurst Road along and the activity created by traffic movements.
- 4.8 Midhurst Road is one of the main roads that connects Haslemere to Midhurst to the south, Godalming to the north as well as Liphook to the west. This section of the road is rural in character and defined with dense tree cover surrounding the narrow road and sits partly within a sunken lane. Whilst there are dwellings along Midhurst Road, these are relatively modest in size and well screened from the road.
- 4.9 The vehicular access onto Midhurst Road would necessitate the widening of part of the road, diverting the existing public right of way and the loss of boundary trees and vegetation to achieve the access and visibility splays. The loss of trees along Midhurst Road will result in a substantial change to the character of this section of the road, opening views into the site and introducing a new road along with engineering features into the rural landscape.
- 4.10 It is acknowledged that proposals have been put forward to reduce the adverse effects but in my opinion, this would fundamentally undermine the character of this length of the road resulting in a substantial adverse effect on the green sunken and enclosed character of Midhurst Road.

## **5.0 VISUAL ASSESSEMENT**

- 5.1 Although the appeal site is set on higher ground, views are largely screened from the wider landscape due to a combination of topography and high tree cover.
- 5.2 I have reviewed the visual effects produced by Sightline and undertaken my own visual appraisal of the local area and walked all the local public rights of way. Field work was undertaken in early autumn when all deciduous planting was in full leaf providing the maximum degree of screening.
- 5.3 The visual appraisal has concentrated on assessing the degree to which the site can be seen from publicly accessible places and private residences, considering distances from the site, topography, and the screening and/or filtering effect of buildings and vegetation. The places where views of the site are possible – i.e. visual receptors – are categorised into the following groups:
- Residential Receptors;
  - Recreational Users, and;
  - Road Users;

A word scale has been used to describe the visual presence the application site within the view as follows:

- Substantial: – where the site forms a dominant element in the view.
- Moderate: – where the site forms an important part in the view.
- Slight: – where the site forms a limited or partial element in the view.

An assessment has then been made whether the development site has a negative, beneficial, or neutral effect upon the view.

#### 5.3 Existing Views from Residential Receptors

There are views towards the site from housing within Scotland Close, future views from the housing under construction (Scotland Park Phase I), from properties along Midhurst Road and Bell Lane, and from Red Court.

#### 5.4 Existing Views from Roads

There are views towards the site from traffic passing along Midhurst Road and Bell Vale Lane.

#### 5.5 Existing Views from Public Rights of Way (PROW)

There are views into the site from users of the public footpath running alongside Midhurst Road.

Existing views are summarised in the table below.

The visual impact upon the existing receptors is summarised within the table below with a word scale to describe the visual effect as follows:	<b>Duration</b> Permanent, long-term or short-term	<b>Nature</b> Direct, indirect, secondary or cumulative and presence	<b>Sensitivity</b>	<b>Notes</b>
<b>Visual receptor</b>				
<b>Residential properties (private views)</b>				
Existing Properties within Scotland's Close	Long	Direct Moderate	Medium	Private views from edge of area
Properties under construction) within Scotland's Lane	Long	Direct Moderate	Medium	Private views from edge of area
Residential properties adjacent to the Midhurst Road	Long	Direct Moderate	Medium	Private views. Views of new access road
Residents of Red Court	Long	Direct Moderate	Medium	Private views.
Residents along Bell View Lane.		Direct Moderate		Private views.
<b>Road users (Public views)</b>				
Users of the Midhurst Road (A286)	Long	Direct Moderate	Medium	Sunken lane. Historic route leaving and entering Haslemere.
Users of Bell Vale Lane	Long	Direct Moderate	Medium	Views of southern edge of site.
<b>Recreational users (Public Views)</b>				
Public footpath CP 597 adjacent to Midhurst Road	Long	Direct Substantial	High	Views into site for walkers using route.

Table 5: Existing Views

## **6.0 Visual Effects**

- 6.1 My assessment is that the appeal site has a Moderate Adverse Effect from adjacent dwellings road network and substantial adverse from the public footpath adjacent to Midhurst Road. Planting would attempt to screen views, but the screening afforded may not be effective for 15 years.

The table below shows a summary of Visual Effects which combine sensitivity and magnitude.

The visual impact upon the existing receptors is summarised within the table below with a word scale to describe the visual effect as follows:	<b>Duration</b> Permanent, long-term or short-term	<b>Nature</b> Direct, indirect, secondary or cumulative	<b>Significance</b> Substantial, moderate, slight or neutral (beneficial or adverse)	<b>Construction phase</b>	<b>Year effect 1</b>	<b>Year 10 effect</b>
<b>Visual receptor</b>						
<b>Residential properties (private views)</b>						
Existing Properties within Scotland's Close	Long	Direct	Moderate	Substantial Adverse	Substantial Adverse	Moderate Adverse.
Properties under construction (Phase 1) within Scotland's Lane	Long	Direct	Moderate	Substantial Adverse	Substantial Adverse	Moderate Adverse.
Residential properties adjacent to the Midhurst Road	Long	Direct	Moderate	Substantial Adverse	Substantial Adverse	Moderate Adverse.
Residents of Red Court	Long	Direct	Moderate	Substantial Adverse	Substantial Adverse	Moderate Adverse.
Residents along Bell View Lane	Long	Direct	Moderate	Substantial Adverse	Substantial Adverse	Slight Adverse.
<b>Public Highways and Transport (public views)</b>						
Users of the Midhurst Road (A286)	Long	Direct	Moderate	Substantial Adverse	Substantial Adverse	Moderate Adverse.
Users of Bell Vale Lane	Long	Direct	Moderate	Substantial Adverse	Substantial Adverse	Slight Adverse.
<b>Public rights of way (public views)</b>						
Public Footpath along Midhurst	Long	Direct	Substantial	Substantial Adverse	Substantial Adverse	Moderate Adverse.

Table 6: Visual Effects

## **7.0 Support for Reasons for Refusal.**

7.1 The reasons for refusal in relation to the landscape and visual effects is that the proposals would have a detrimental effect upon the receiving landscape and visual amenity due to the urbanising effect of the new road, dwellings, and associated features. This would unduly diminish the rural character and special qualities of the landscape and have an adverse impact on the Surrey Hills AONB. The site is a valued landscape as defined by the NPPF and the requirement for planning policies and decisions to contribute to and enhance the natural environment by protecting and enhancing valued landscapes. In addition, Para 176 states that great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty.

7.2 The site lies within the nationally important AONB, and this is an exceptional landscape whose distinctive character and natural beauty are so precious that it should be safeguarded in the national interest.

7.3 The most relevant Local Plan Policies are RE1 and RE 3.  
RE1 states that:

*“Within areas shown as Countryside beyond the Green Belt on the adopted policies map, the intrinsic character and beauty of the countryside will be recognised and safeguarded in accordance with the NPPF”*

RE3 states that:

*“New development must respect and where appropriate, enhance the distinctive character of the landscape in which it is located .....*

*Surrey Hills Area of Outstanding Natural Beauty. The protection and enhancement of the character and qualities of the Surrey Hills Area of Outstanding Natural Beauty (AONB) that is of national importance will be a priority and will include the application of national planning policies together with the Surrey Hills AONB management Plan. The setting of the AONB will be protected where development outside its boundaries harm public views from or into the AONB.*

## **7.4 Haslemere Neighbourhood Plan 2013-2033**

The whole of the site lies within the Haslemere Neighbourhood Plan area. The principles chapter states that “Haslemere encompasses a natural environment notable for its geodiversity and biodiversity assets. The Haslemere Neighbourhood Plan seeks to protect these unique environmental assets from damage and loss for future visitors and wildlife”.

Haslemere Town Council recognises the need for more homes. Policy H9: Trees, woodland and hedgerows aims to protect trees, woodland and hedgerows within the Plan area the tree removal to accommodate the new road is in conflict with this policy.

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- 7.5 Surrey Hills AONB Management Plan 2020 -2025** sets out a vision and policies for the conservation of the natural beauty of the Surrey Hills landscape. The vision for the Surrey Hills recognises that the landscape will change but ensures that it changes in a way that conserves and enhances its special qualities. In doing so, it also needs to maintain the social and economic viability of the Surrey Hills in a sustainable manner.
- 7.6 Policy P1 of the Management Plan states that “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. Policy P2 gives attention to potential impacts on ridgelines, public views, and tranquillity; as well as material colour and dark skies.
- 7.7 In my opinion the proposals do not comply with these requirements and would lead to an adverse effect upon the landscape and scenic beauty within the AONB at both a local and national level. Paragraph 176 of the NPPF states that. “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”. I consider that the proposals would lead to an adverse effect upon the landscape and scenic beauty within the AONB which are areas are designated in recognition of their national importance.



## **8.0 SUMMARY AND CONCLUSION.**

- 8.1 The application site is a greenfield site that lies within the Surrey Hills Area of Outstanding Natural Beauty (AONB). It compromises some of surreys most outstanding and beautiful landscapes and are protected for the enjoyment of the nation. There is a great need to protect the site and undeveloped land from development.
- 8.2 The proposals are contrary to AONB planning polices as set out in the NPPF, Local Plan and the Surrey Hills AONB Management Plan and constitute major development within this protected landscape. This area has a high landscape quality, value and high sensitivity.
- 8.3 The main area of development would be located on rising ground adjacent to Scotland Close and the consented scheme currently under construction. A new vehicular access road which would run from Midhurst Road is required to service the new housing. The new junction and increase in traffic movements, would adversely affect the character and appearance of the road which marks the start of the countryside from the built-up area of Haslemere.
- 8.4 It is considered that the development would adversely affect the landscape character of the local area and the AONB. Although the site is relatively visually contained there are local views into the site from the adjacent public right of way. Visual effects are Substantial/moderate adverse.
- 8.5 The scheme disregards the scheme's setting within the landscape. The development of undeveloped land fundamentally alters the landscape character against the Guidelines of the Surrey LCA and contrary to several local policies. The development proposals would have a permanent significant adverse impact on the landscape character.
- 8.6 The design proposals include landscape improvements to the south including conifer removal, the planting of new broadleaf trees, the enhancement of grasslands and access improvements as well as a Suitable Alternative Natural Green Space (SANG). These proposals although welcome do not significantly improve the landscape character and quality of the area to offset the adverse harm caused by the development of some 111 new dwellings. Therefore, the proposed landscape improvements would not lead to a beneficial change to the undeveloped land.
- 8.7 The landscape effects of the new housing and access road are judged to substantial adverse within the receiving landscape and are not capable of being mitigated.