11 September 2014

Former Wisley Airfield, Ockham Parish

Landscape and Visual Implications of Allocating the Former Wisley Airfield for a New Settlement North of Ockham

Report Number: 2275_R01b_CB_RW
Author: Clare Brockhurst FLI
Checked:
Contents

Section 1: Introduction ............................................................................................................. 1
Section 2: Landscape and Visual Baseline .............................................................................. 3
Section 3: Landscape and Visual Impacts – Implications of Development ....................... 10
Section 4: Conclusions ........................................................................................................... 11

Appendix

Appendix 1: Review of the Summary Landscape and Visual Material prepared on behalf Wisley Property Investments Ltd

Plans & Photoviewpoints

Plan 1: Landscape Planning Policy
2275/P03a September 2014 CB/AW

Plan 2: Landscape Character – Published Context
2275/P04a September 2014 CB/AW

Plan 3: Topography
2275/P01a September 2014 CB/AW

Photoviewpoints
2275/P07 September 2014
Section 1: Introduction

1.1. Tyler Grange LLP has been appointed by Wisley Airfield Action Group (WAAG) to consider the landscape and visual implications of releasing the Former Wisley Airfield (FWA) site from the Metropolitan Green Belt for the development of a new settlement. This site is being promoted by Wisley Property Investments Ltd.

1.2. Tyler Grange is a private consultancy offering advice on a variety for issues, including landscape and visual matters, to a range of clients including developers, planning authorities and other interested parties. As a practice Tyler Grange has extensive knowledge and experience in the effects of strategic development on the landscape across the UK. Tyler Grange is involved in a number of projects involving Green Belt release sites; these sites are located on the edge of existing settlements.

1.3. This report has been prepared by a Fellow of the Landscape Institute (FLI) with 25 years’ experience in the field of landscape planning, and housing development. Support has been provided by graduate members of the team and a Chartered Member of the LI (CMLI).

1.4. Tyler Grange is part of a wider team of consultants working on behalf of WAAG. This report should be read in conjunction with the documentation prepared by Bell Cornwell LLP. Tyler Grange has also undertaken a review of Technical Appendix 7 – Initial landscape, Visual and Green Belt Summary contained in the Savills’ representations to the Guilford Local Plan: Strategy and Sites Issues and Options Consultation. This analysis is contained at Appendix 1 of this report.

Purpose

1.5. This report considers the implications of the proposed Green Belt release at a strategic level on the landscape and visual resources.

1.6. Whilst it is acknowledged that the site lies within the Green Belt it is import to recognise that this designation is not a landscape designation. This matter has been clearly determined in the judgement of Mrs Justice Patterson.

"The Green Belt is not a landscape designation. It is a policy which has a spatial function. It is delivered through Green Belt land fulfilling the five purposes set out at paragraph 80 NPPF. It is right that, under paragraph 81 of the NPPF, local planning authorities are advised to plan positively to enhance the beneficial use of the Green Belt by, amongst other things, retaining and enhancing landscape, visual amenity and bio-diversity but those matters are to be delivered by way of positive realisation of the purposes of the Green Belt are not a separate iteration of positive harm if the positive aspect to Green Belt policy is unable to be fulfilled. The effect on the landscape character and visual impact of a development proposal are clearly material considerations but are different from a consideration of harm to a Green Belt. If a development proposal contributed to the enhancement of the landscape, visual amenity and biodiversity within the Green Belt those could well be factors in its favour as part of the very special circumstances balancing exercise..." (Tyler Grange emphasis)

1 27th June 2014, Redhill Aerodrome Limited and (1) Secretary of State for Communities and Local Government (2) Tandridge District Council (3) Reigate and Banstead Borough Council (Case No CO/1361/2014).
1.7. The purpose of this report is to inform the decision making process in respect of the strategic decision to allocate new housing in this location. This report is not a Green Belt review or critique nor is it a Landscape and Visual Impact Assessment (LVIA). This report provides decision-makers with information as to the implications of development at the Former Wisley Airfield on the landscape and visual assets.
Section 2: Landscape and Visual Baseline

2.1. In order to appreciate the implications of development of the site it is necessary to understand the existing situation. The following text follows the approach promoted in the current professional guidance\(^2\) and has been informed by desktop studies and fieldwork undertaken in August and September 2014.

**Landscape Policies**

2.2. The National Planning Policy Framework (NPPF) has at its core a presumption in favour of sustainable development. At paragraph 14 the NPPF identifies a number of policies which indicate that development should be restricted, examples of these policies are listed in footnote 9:

"... *Birds and Habitats Directives* (see paragraph 119) and/or designated *Sites of Special Scientific Interest*; land designated *Green Belt*, *Local Green Space*, an *Area of Outstanding Natural Beauty*, *Heritage Coast* or *within a National Park* (or the *Broads Authority*); designated *heritage assets*; and *locations at risk of flooding or coastal erosion*." (Those underlined apply to the Site).

2.3. Paragraph 109 of the NPPF recognises the need to contribute to and enhance the natural and local environment. This includes protecting and enhancing valued landscapes. The NPPF does not define 'valued landscapes' this is normally recognised through national, regional and local landscape designations. However within the landscape profession there is acknowledgement that communities do value landscapes for a variety of reasons, designations are therefore not a sole indication of value.

2.4. The following policy has been extracted from the Guildford Local Plan 2003, whilst it is accepted that this are now out of date they demonstrate the importance of landscape and visual matters irrespective of the Green Belt designation.

"*Policy G1 (12) SAFEGUARDING AND ENHANCEMENT OF THE LANDSCAPE AND EXISTING NATURAL FEATURES* Development is designed to safeguard and enhance the characteristic landscape of the locality and existing natural features on the site, such as hedgerows, trees, watercourses and ponds which are worthy of protection." (Tyler Grange emphasis).

2.5. This is important as it provides the clear distinction between Green Belt harm and Landscape harm and the need for these to be considered separately. **Plan 1 - Landscape Planning Policy (2275/P03a)** indicates a number of related policies which relate to the site, include those areas where public access permits opportunities for the public to view the site, these are important in terms the assessment of visual impacts.

2.6. In addition to the policies which apply to the Site and local environs there are a large number of public footpaths and an extensive area of access land. This level of public access will affect the perception and value of the landscape to the local community and a wide population of users.

---

Landscape Character

2.7. As set out in the Landscape Character Assessment Guidance\(^3\), paragraph 2.7 the Landscape Character Assessment process draws an important distinction between the two stages below:

- "The relatively value-free process of characterisation; and"
- "The subsequent making of judgements based on knowledge of landscape character."

2.8. Characterisation is:

"The process of identifying areas of similar character, classifying and mapping them and describing their character."

2.9. It should be noted that the key characteristics associated with each character area/type are not to be interpreted as the only characteristics of a character area/type. The classification process does not mean that the character is uniform across an area; there will always be variation in the character and changes in dominance of the elements in the landscape. This does not mean that elements not recorded in the character assessment are not present but that they do not significantly contribute to the character or make the landscape distinctive.

2.10. Paragraph 2.14 of the guidance addresses the issue of scale in the Landscape Character Assessment process. It is stated that:

"Landscape Character Assessment can be applied at a number of different scales from the national or indeed European level to the parish level. Ideally assessments at different scales should fit together as a nested series or a hierarchy of landscape character types and/or areas so that assessment at each level adds more detail to the one above."

2.11. The guidance then goes on to identify the three main levels at which Landscape Character Assessments are carried out, namely national and regional scale, local authority scale and local scale. Specifically in terms of the local scale the guidance states:

"**Local scale:** sometimes it may be necessary or appropriate to carry out an assessment of a smaller area at 1:10,000 or even larger scales, such as an individual parish, an estate or farm, a country park or a proposed development site. At a local scale it is important to set the area firmly in the context for a wider character assessment, to show which landscape type/area it falls within. A detailed assessment may then either map landscape types and/or areas at an even finer scale, or add detail by mapping and describing the individual elements which contribute to the character of the area, such as hedges, arable fields and farm buildings. Local assessments may also consider the contribution made by the site to the character of the surrounding area as well as views into and out of it."

2.12. This approach sets out the context to each of the published character assessments and the need to consider the character at a scale appropriate to the proposals. This assessment also considers the local scale character.

---

\(^3\) Landscape Character Assessment – Guidance for England and Scotland, Scottish Natural Heritage and The Countryside Agency, 2002 (known as SNH guidance).
2.13. It is noted that the characterisation process is a non-value judgement process; therefore classifying landscapes into distinct areas does not suggest that one character is more sensitive than another or valued by people more or less, no one landscape character is better or worse.

National Character

2.14. The Countryside Agency's Character Map of England identifies broad National Character Areas (NCAs) for the whole of England. Work undertaken by Natural England has updated a series of NCA profiles to collate information from across a range of environmental disciplines to identify key opportunities and context for local decision making and action.

2.15. The Site is located across two NCA's, 114 Thames Basin Lowlands and 129 Thames Basin Heaths. The delineation of these character areas are shown on Plan 2 - Landscape Character - Published Context (2275/P04a).

2.16. The national characterisation provides a general overview of the key characteristics, those relevant to the Site are:

"Gently undulating lowlands crossed by meandering rivers with broad and flat valley plains. Underlying geology of predominantly London Clay with modified and straightened rivers marked by riparian woodlands and meadows in more rural sections. A pastoral landscape interspersed with woodland, hedgerows, trees, remnant commons, farmsteads and small to medium irregular fields bounded by often-gappy hedgerows. Increasing fragmentation of farmland character from spread of development and transport infrastructure; with numerous major road and rail networks criss-crossing the area. Sparser settlement in the west around Guildford." (Thames Basin Lowlands)

"Plateaux of Tertiary sands and gravels in the London Basin, with intervening river valleys floored by London Clay which are wet with ditches, numerous watercourses and ponds. Acid, leached soils mean that farming on the plateaux is limited to rough pasture; arable land and improved pasture are found in the valleys, on alluvium. High woodland cover with conifers and large plantations on former heathland are dominant features in the east, with a patchwork of small to medium-sized fields. Roads (including the M3) dissect heathland and woodland into blocks. ‘Churring’ nightjars, dragonflies and purple heather are all readily identified with heathland. The Thames Basin Heaths SPA protects internationally important populations of woodlark, nightjar and Dartford warbler. Historic commons offer tranquillity and unenclosed views." (Thames Basin Heaths)

2.17. As noted in Appendix 1 the promoters of the site have failed to correctly recognise the correct relevant national character areas which apply to the site. However, these descriptions cover an extensive area and only provide a general overview.


2.19. The site lies within **E: Wooded Rolling Claylands** Landscape Character Area (LCA). An overview of the key characteristics of this landscape type that relate to the site are summarised as:

"Gently rolling lowland based on the London Clay Formation with a mix of land uses with pastoral and arable farmland, woodland and historic parkland. Settlement pattern of scattered farmsteads and small, nucleated villages within a largely peaceful, rural landscape."

2.20. Within this LCA, there are further 'sub divisions' and the Site lies within Landscape Character Type (LCT) **E2: Ockham and Clandon Wooded Rolling Claylands**. An overview of the key characteristics of this landscape type that relate to the site are described as:
"Gently sloping lowland based on the Clay, Silt and Sand of the London Clay Formation with a network of small streams, ponds and ditches dissected by major transport routes including the A3. A fragmented area, enriched by parklands and woodland but with rural views often obscured by settlement with large geometric fields of pasture and some arable bounded by hedgerows or fences. The area supports a range of land uses; pastoral and arable farmland, woodland and parkland. Blocks of woodland and plantations are often associated with the historic parks with horse paddocks present particularly to the north where they fragment the field pattern by subdividing the large fields with fences, and attract associated buildings and facilities. Settlement consists of scattered farmsteads, grand houses in parkland and large extended villages."

2.21. Within this LCT, important views have been identified for the area as follows:

- "Long views over the area towards the higher ground of the chalk downs to the south with their unsettled open lower slopes and wooded upper slopes and ridgeline.
- Views across designed parklands and gardens to historic mansions.
- View of Guildford Cathedral from the A3 announces the town to those arriving from the north east."

2.22. Some of the local landscape qualities which are identified as key valued features are perceived as important or special within the area. This information has been drawn from local stakeholder consultations; those which relate to the site include the following:

"An area of open, undulating lowland landscape of farmland, woodland and parkland that looks to the North Downs which forms its horizon to the south

'Ruralness' of landscape perceived to be under threat of development causing amalgamation of existing settlements."

2.23. This aspect of the published assessment is important in the context of paragraph 109 of the NPPF and the appreciation of the 'value' placed on the landscape by those who live in this landscape.

2.24. Within this landscape type the Landscape Strategy is as follows:

"The strategy for Ockham and Clandon Wooded Rolling Claylands is to conserve the rural pastoral landscape with its network of hedgerows, frequent historic parklands, woodlands and the traditional farmsteads and villages. Elements to be enhanced are the hedgerows tree cover, and the settlement pattern where this dilutes the rural character of the area."

2.25. As part of the evidence base for the Guilford Local Plan the Council instructed the preparation of Green Belt Landscape Character of the Potential Development Areas, relevant to the site is C18 (Section 22: Wisley Airfield), within this document the landscape is described as:

"The PMDA is located within a landscape that is partly degraded through the construction of the airfield runway and the removal of field hedgerows. The PMDA to the east of Hatch Lane that passes through the centre is characterised by the disused runway and large open arable fields. The PMDA to the west of Hatch Lane is more enclosed by treebelts and woodland within the surroundings of Elm Lane to the north, and Hyde Lane to the south. A large area of hardstanding is located to the north of the disused airfield near Elm Corner."

2.26. Interestingly given that this is a specific site assessment the description is extremely limited and fails to address the full range of physical and perceptual landscape characteristics as set out in the
published guidance. There is insufficient information in this document to enable decisions of this scale and magnitude to be made.

**Site Specific Character**

2.27. From the desktop studies and fieldwork it is clear that whilst the airfield and more specifically the hard standing area, indicate the previous use from aerial photography and mapping moving through the landscape these features are only apparent when immediately adjacent to the hard surfacing. There are no above ground structures. The use of the adjoining fields for grazing and arable strengthen the rural and agricultural appearance and perception of this landscape.

2.28. The Site occupies a local elevated plateau in a generally low lying landscape; this is illustrated by Plan 3: Topography (2275/P01a). It is recognised that landform is often one of the main influences on the landscape character as this will influence land use and vegetation cover.

2.29. Lying in this elevated location there are no areas of standing water or water courses associated with the site, although notable hydrological features are located beyond the site.

2.30. Reference to historic mapping and historic aerial photography illustrates that in terms of the openness of the landscape and hedgerow loss and field enlargement this started to occur prior to 1919 and was therefore due to agricultural management and farming needs rather than suggested the construction of the airfield. In 1945 the airfield benefiting from the more open (further minor hedgerows had been removed) and elevated location was a grass airfield with no hardstanding. This progression illustrates that there has been a general move towards a more open agricultural landscape prior to the use as an airfield.

2.31. Comments in the published assessments are incorrect in stating that loss of the hedgerows was as a result of the construction of the airfield and that such a loss has degraded the landscape, this indicates that there is an absence of a proper understanding of this landscape which is fundamental to the decision making process.

2.32. The historic changes are a managed approach to the landscape and the agricultural requirements which does not necessarily mean that the value and character of the landscape is degraded as an entity.

2.33. It is acknowledged that away from the airfield the landscape is densely wooded and the field pattern is of a smaller scale with mature field boundaries. The quality of the landcover means that it supports a wide range of ecological habitats and associated flora and fauna; this is recognised by the ecological designations and level of protection afforded by the relevant policies which apply locally. The woodland to the north provides a distinct feature separating the airfield from the developed and settled landscapes to the north.

2.34. Despite the growth of settlements to the north of the airfield the character of the site and the landscape it is associated with is generally sparsely settled with small villages and hamlets characteristic of the area (predominately to the south). This distinct lack of settlement strengthens the sense of rurality of the area. In addition to the relatively unsettled character of the landscape the woodland cover ensure that the landscape is distinct from the wider sources of visual and audible disturbance generating a relatively more tranquillity and peaceful landscape. This supports

---

5. www.old-maps.co.uk
6. Google Earth
the findings and conclusions of the Council's published landscape character assessment for the area.

**Views**

2.35. Clearly the published character assessment recognises the important of views within and across the landscape. In addition the character of the landscape is appreciated visually and as such the composition of views and presence of key characteristics are important.

2.36. The Photosheets appended to this report illustrate how the character and key views are currently apparent from public vantage points.

2.37. Notably the presence of the woodland at Ockham Common, north of the airfield, and the rising ground of the Area of Outstanding Natural Beauty to the south mean that the site is visually associated with the landscape to the south. The relatively elevated and open nature of the site means that any changes will be more notable in this location than lower-lying well-treed locations.

2.38. Whilst the 2007 Landscape Character Assessment refers to major transport corridors and the wider road network causing visual fragmentation of the landscape and local noise pollution this is not evident within the site or its local context. There is strong visual unity with the AONB and within the character areas due primarily to the notable absence of development.

**Key Implications**

2.39. Clearly the NPPF is predicated on the delivery of sustainable development and the Council’s own assessment of the Former Wisley Airfield site is that the site is unlikely to deliver a sustainable new development.

2.40. The new settlement would need to generate sufficient population to create and maintain the necessary infrastructure required to sustain development in this location. Therefore any consideration of development of the airfield must address the landscape and visual harm associated with the infrastructure increased traffic, lighting and disturbance beyond the extent of the redline. This has yet to be undertaken and therefore its implications are unknown at this stage.

**Green Belt**

2.41. Clearly, based on the fact the Green Belt designation is not a landscape designation, the issue of effects on the Green Belt is not a matter for the landscape and visual assessment. However, if a development proposal can demonstrate conservation and enhancement of the landscape, visual amenity and biodiversity within the Green Belt those could well be factors in its favour as part of the very special circumstances balancing exercise. It is extremely unlikely that development of the former airfield will either conserve or enhance the landscape. Any Green Infrastructure will be provided as mitigation for harm caused.

2.42. In terms of the Green Belt function, the promoters of the site and the Council appear to argue that the former airfield currently fails to contribute to all or any of the purposes. A localised assessment of the compliance of the site against the 5 purposes fails to recognise the strategic and spatial function of the Green Belt designation.
2.43. However, if this site were to be developed reliance will be on a 550m (approx.) gap between the new settlement and Ockham. In addition there will no longer be a wide, open Green Belt between East Horsley, Guilford, Woking and Leatherhead.

2.44. If a new settlement were to be constructed it is likely there would be pressure to expand this through ‘Sustainable Urban Extensions’ thereby further undermining the permanence of the openness of the Green Belt, contrary to the purpose of ‘safeguarding the countryside from encroachment’. Whilst treed features and field boundaries are promoted as limits to the development at the current time, over time, particularly in the instance of this site promotion, there is no certainty that they will remain defensible. The uncertainty as to the capacity of the site is already questioned as a result of the existing constraints and availability of developable land.

2.45. Exploration of alternative locations for new housing in sustainable locations must be considered before such a release is countenanced.
Section 3: Landscape and Visual Impacts – Implications of Development

3.1 Based on the Council’s own landscape character assessment there are a number of key characteristics and qualities which need to be conserved and enhanced in this LCT. Notably hedgerows and tree cover need to be enhanced and the settlement pattern of this landscape needs to be controlled, ‘where this dilutes the rural character of the area’. Development of a new settlement in this location would irrevocably harm the rural character of the wider landscape, particularly to the south of the site. In additional the rural character of the site would be completely lost.

3.2 Despite the area of hard standing forming the runways, only a limited part of the airfield has been accepted by the Council as being Previously Developed Land (PDL). That area is limited to the lower portion in the north west corner of the site. The fact that the runways are at ground level means that the ‘development’ is not a notable element of the landscape and such hard standing is well assimilated into the landscape and visual context. The appearance and perception remains predominantly rural, this is illustrated by the photographic material.

3.3 It is the rural character of the landscape, and absence of settlement, that is valued by the local community, as recognised and recorded in the Council’s landscape assessment. As such the Council’s own assessment recognises the need to conserve the rural pastoral landscape. Whilst this may not alter the character of the airfield, allocation and development of the site will not make any contribution to this conservation.

3.4 Development of the former airfield would have direct and indirect impacts on key landscape characteristics notably the rural, open and isolated qualities. This would affect the site and a wider area beyond the ‘site’ through increased traffic movements and an increased population using the landscape.

3.5 Upgrading and development new infrastructure will reinforce those features which are considered to be detractors in the existing landscape. Development will exacerbate and compound these landscape detractors into an area currently relatively undisturbed and devoid of harmful features.

3.6 The elevated and open nature of the site means that any change will be evident in local and distant viewpoints (including from the AONB). Given the level of public access in this landscape this will affect a wider population of users on a daily basis.
Section 4: Conclusions

4.1 As noted in the representations made on behalf of WAAG there are real concerns as to the allocation of the Former Wisley Airfield for a new settlement in terms of; availability, suitability, sustainability and deliverability of this location. The constraints affecting this site are specifically noted in paragraph 14, footnote 9 of the NPPF where development should be restricted.

4.2 There are a number of known constraints to development and an acknowledgement that this would not result in sustainable development as required by the NPPF.

4.3 Development in this location will result in harm to the landscape character of the area and visual context affecting locally valued attributes and a wide and extensive population.

4.4 At this stage, based on the Council’s evidence base and the information provided by the site’s promoters, there is no proper and detailed understanding and acknowledgement of the issues and the significant harm that will arise. Given the nature of the proposals and that the decision will be irreversible it is incumbent on the decision-makers to ensure that the correct strategic decision is taken on detailed information prior to committing to causing environmental harm to the Green Belt and the landscape and visual character of the area.
Appendix 1: Review of the Summary Landscape and Visual Material prepared on behalf Wisley Property Investments Ltd
Appendix 1: Review of the Summary Landscape and Visual Material prepared on behalf Wisley Property Investments Ltd

Introduction

A1.1. Tyler Grange is part of a wider team of consultants working on behalf of WAAG this report should be read in conjunction with the documentation prepared by Bell Cornwell LLP. Tyler Grange has undertaken a review of ‘Technical Appendix 7 – Initial landscape, Visual and Green Belt Summary’ (TA7) contained in the Savills’ representations to the Guilford Local Plan: Strategy and Sites Issues and Options Consultation. TA7 has been prepared by Davis Landscape Architects (DLA).

Purpose

A1.2. This report considers the methodology used, and effects assessed, in the promoter’s landscape summary (TA7) presented to the Council in support of the allocation. The purpose of this analysis is to establish the extent to which reliance can be placed on the landscape and visual evidence provided by the promoters of the Site.

A1.3. It is acknowledged that the TA7 is only a summary report, but it is important that any information provided, to the decision-makers, at this strategic planning stage is robust and reliable when making decision that will affect the long-term future of the landscape and have significant effects on the landscape and visual character of the area.

A1.4. This report is intended to support WAAG’s representations in objecting to this potential allocation and future development of the Former Wisley Airfield.

A1.5. In preparing this review reference has been made to the professional guidance ‘Guidelines for Landscape and Visual Impact Assessment, third edition, Landscape Institute and Institute of Environmental Management and Assessment, 2013’ (GLVIA3).

Critique

A1.6. For the purpose of this report we rely on the term ‘Landscape’ as defined by the European Landscape Convention, 2000 (ELC) as:
“... an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors”.

A1.7. The Landscape and Visual Appraisal deals with the separate but interlinked issues of:

i. Landscape Character: The potential effects of the Development upon discrete character areas and/or character types comprising features possessing a particular quality or merit; and

ii. Visual Context: The potential effects of the Development on views from visual receptors, and upon the amenity value of the views.

A1.8. Changes to the landscape and visual context can arise as a result of:
i. Changes to the fabric of the landscape including either the loss of key elements or introduction of new features, which are uncharacteristic or alter the distinct character of the landscape;  
ii. Changes which alter the way in which the landscape is perceived or appreciated; and  
iii. Changes to views in terms of elements present and their distribution or dominance. Such changes may or may not have a significant effect on the visual amenity of the visual receptors (i.e. people).

A1.9. Criteria for assessing TA7 are divided under the following headings typically discussed in an LVIA:

i. Introduction and methodology;  
ii. Description of the proposed development;  
iii. Baseline Studies;  
iv. Identification and assessment of landscape and visual effects; and  
v. Presentation of findings.

A1.10. The highlighted text sets out the requirements of the LVIA process. The text below contains Tyler Grange's commentary on each requirement.

**Introduction and Methodology**

The remit, qualifications and experience of those responsible for preparing the assessment must be identified Paragraph 2.24 of GLVIA3 "Professional judgements must be based on both training and experience and in general suitably qualified and experienced landscape professionals should carry out Landscape and Visual Impact Assessments"

A1.11. There is no reference to the qualifications of the author in TA7.

The methodology used must be clearly described including the overall assessment process, links to scheme design, specific techniques used with clearly defined and agreed terminology. Information should include details of consultations, guidelines, checklists, best practice examples of similar projects where appropriate, and consider the types of impacts (positive or negative, cumulative, short term, long term, permanent/temporary direct/indirect)

A1.12. GLVIA3 is referenced in the text of TA7, whilst sets out the framework for the baseline of the LVIA there is no indication as to the specific methodology that will be used in the assessment process, the published guidance is not prescriptive.

A1.13. There is no methodology set out for the Green Belt element of the report detailing how compliance with the Green Belt purposes are determined and analysed to support the assertions made in the tables and supporting text (section 7.2 of TA7). As noted in the main report prepared by Tyler Grange the Green Belt is not a landscape designation and it appears that TA7 places greater analysis on the Green Belt issues than the landscape and visual harm from the potential development. Whilst landscape architects are involved in the review of the Green Belt purposes it is important that such as review is underpinned by a robust methodology and approach defining the threshold for each of the criteria being assessed. The lack of a stated methodology or defined, measurable criteria results in the conclusions being meaningless.

A1.14. Links to scheme design – there is no evidence of inputs into design to ensure adverse landscape and visual effects can be avoided, minimised or offset.

A1.15. Specific techniques used with agreed terminology – There are no details about photography guidance for photoviewpoints. ‘Magnitude’ and ‘Significance’ are mentioned within Paragraph 7.1.1 but definitions of what they mean in the context of the LVIA for this site are not provided. The
definition and thresholds are essential in determining the effects of the development on the landscape and visual context.

A1.16. Details of consultations – There is no evidence of dialogue with the competent authority to agree a study area or viewpoints (para 7.21 of the GLVIA3). However within the ‘further baseline work to be undertaken’ there is a point referencing that they will agree viewpoints and study area with LPA at a later date.

A1.17. Guidelines and checklists – Checklists are used in the Green Belt assessment but there is little description of what they mean and how the results have been arrived at, within the limited methodology. Environmental capacity table (7.7) has no supporting methodology.

A1.18. Types of impacts – there is no description on the types of impacts and what the implications of the development will be on the landscape and visual resources. This is an initial summary of the landscape, visual and Green Belt context. However, it is essential that before a site is released from the Green Belt, which is located in open countryside and separate from existing settlements and infrastructure, the full implications are understood prior to allocating the land for a new settlement. Once the land has been developed the harm cannot be reversed.

- Reasoned criteria, thresholds and judgments for evaluating the significance of effects must be explained

A1.19. Paragraph 3.16 of GLVIA3 states that ‘the level of detail required should be that which is reasonably required to assess the likely significant effects. It should be appropriate and proportional to the scale and type of development and the type and significance of the landscape and visual effects likely to occur’. This is not explained in TA7. This matter is critical given the scale and magnitude of the project through the creation of a new settlement in the Green Belt. Paragraph 3.35 of GLVIA3 notes that ‘in reporting on the significance of the identified effects the main aim should be to draw out the key issues and ensure that the significance of the effects and the scope for reducing any negative/adverse effects are properly understood by the public and the competent authority’. (Tyler Grange emphasis).

A1.20. The significance of landscape and visual effects has obviously not been identified within the baseline, however there is no summary of the key visual and landscape issues. It is not possible to identify what issues may be associated with the site to inform strategic planning decision. Overall, this is an initial report without the assessment of effects.

A1.21. In terms of the Environmental Capacity of the site (Table 7.7) there is no information which provides an indication as to low, medium or high capacity against each criterion cited in the table. There is no indication as to how the conclusion of a capacity of 2100 to 2500 new homes is reached. The report does not indicate any adverse effects or harm arising and lacks impartiality in its analysis of the key issues associated with development in this location.

- Scope of the assessment, key issues, how these were determined and any constraints and data deficiencies that may apply must be explained

A1.22. Scope of assessment - Paragraph 7.1.1 of TA7 states “when complete the assessment will set out the existing landscape and visual baseline environment and will assess its quality and sensitivity to the proposed development. It will describe the nature of the anticipated change upon the landscape character in the study area and upon a number of representative visual receptors and will assess the magnitude and significance of the anticipated changes” – this is the scope of the assessment to be prepared at a later date. What is not clear is the scope of the Summary report. TA7 does not
reach any conclusions on the key landscape and visual issues of developing the Former Wisley Airfield which are fundamental in determining whether or not release of this site for a new settlement is acceptable and would not generate

A1.23. Scope of assessment – There is no description of the aim of the Green Belt review element; it is unclear how the Green Belt review fits within a landscape assessment. There is one sentence in paragraph 7.1 but it does not give sufficient detail as to the methodology and purpose of this part of the review.

A1.24. Key issues & how they were determined - There is no summary of the key issues so this means that there has been no identification of how these would be determined.

A1.25. Constraints - Designation constraints have been identified in paragraph 7.1.20 onwards, PRoW constraints identified in paragraph 7.1.33. Visual and landscape character constraints are not fully explored – only views from the AONB are considered the ‘most appealing and stimulating’ (TA7 paragraph 7.1.55). As a result of these deficiencies the constraints to development are not properly explored which is a notable omission given the substantial changes which will occur.

Description of the proposed development

- A description of the environment as it is and how it would develop if the project did not proceed

A1.26. Paragraph 7.1.24 onwards describes the land use of the site and touches on future development of the site (recycling facility) however this is not a detailed description of the likely changes, building heights, massing and mix of uses. Paragraph 7.1.37 of TA7, relating to landscape character, states that “the Guildford LCA recognises the past changes that have been made within the site and that further intensification of uses are likely, given its allocation in the Surrey Waste Plan as being safeguarded for waste management”.

A1.27. This reference does not support a new settlement.

- A clear description of the purposes and objectives of the development covering the basic elements of the development of relevance to the landscape and visual assessment

A1.28. Paragraph 7.1.1 of TA7 states that the development at Wisley Airfield would be to create a new settlement between 2100-2500 homes. There are no further details as to what will be contained within the development (i.e. employment, schools, recreation etc.). The lack of acknowledgement of associated infrastructure such as roads, lighting and increased traffic is not acknowledged in this text. Off-site impacts will affect the landscape and visual context of a much wider area than the site. With the creation of a new settlement the infrastructure and associated effects will be significant and should not be over looked or underestimated at this early stage in the process.

- The land affected should be clearly marked on a map and different land uses of this area clearly demarcated

A1.29. There are no plans to accompany TA7. Land use is described in text but not in plan form. The site boundary is not shown on any plan, importantly the ‘land affected’ will include the area beyond the site and all roads connecting the wider area to the site.

- The landscape constraints and opportunities must be clearly defined
A1.30. There is no summary of the visual, landscape character or landscape policy sections and so opportunities and constraints are not identified. The Green Belt section at the end of the document does have a summary section which identifies opportunities and constraints of the Green Belt associated Wisley Airfield.

- Potential effects associated with construction and operation must be identified and evaluated

A1.31. This is not provided at this baseline stage; however the decision to allocate this site should be based on a full and robust understanding of the potential issues.

- Alternatives must be considered where practical and appropriate, considering their advantages and disadvantages and reasons for the preferred option

A1.32. There is no evidence that alternatives locations for a new settlement of this scale elsewhere within or outwith the Green Belt have been considered. However this exercise needs to be addressed by the Council.

- Mitigation proposals as part of the development proposal and prior to the assessment must be referred to

A1.33. Whilst it is acknowledged that mitigation measures would be considered through the iterative design process given the magnitude of change that will be occur there should be an early understanding as to the extent to which potential adverse effects will be avoided, minimised or offset.

**Baseline Studies**

- Information on relevant landscape and visual planning and legal context including published policies and guidance on designations must be outlined

A1.34. There are no policies extracted from the NPPF.

A1.35. There are no policies extracted from the Local Plan.

A1.36. There are no supplementary planning guidance/documents referred to (the AONB management plan has not been referenced at all).

A1.37. The policy context only references the Guildford Green Belt and Countryside Study, which gives an overview of the 4 volumes and does not include the 5th volume which specifically Section 22 – where the Wisley Airfield site is identified as a PMDA (potential major development area). It is noted that volume 5 was only commissioned at the time TA7 was being prepared.

A1.38. Designations have been referred to within paragraph 7.1.20 onwards but details on the policies/guidance associated with these have not been identified.

A1.39. Overall, the landscape policy section is weak. There is no policy analysis to inform opportunities or constraints to take onto the assessment stage or for use within the design development for the site.

- Landscape Baseline Review: There must be a clear description and assessment of individual elements, features and characteristics of the landscape and their value/importance, an analysis of how these components interact considering landscape character, condition value and enhancement potential.
A1.40. Two national character areas cross the site (NCA 114 and 129). TA7 only identifies NCA 114 and therefore the baseline understanding excludes a major series of characteristics which may apply to the site. The key characteristics of 114 as relevant to the site have not been highlighted, without an explicit recognition of the issues which would need to be addressed to conserve or enhance the landscape character in accordance with the planning approach promoted in the NPPF and Local Plan.

A1.41. Local landscape character - The text in paragraph 7.1.36 makes reference to the key characteristics within landscape type E2 stating that the site does display a few of the key characteristics within this type, however it does not state which characteristics are present and the degree to which these are relevant in the development of a new settlement.

A1.42. Local landscape character management guidelines – Paragraph 7.1.38 touches on the management guidelines of the LCA extracting only the aims to avoid ‘any large mass or bulky structures where visually intrusive’ and to ‘retain the strong sense of enclosure’. The solution to this, as understood from TA7, is to ‘restore key characteristic features’ (which are have not identified within TA7) and to ‘manage the landscape in a more positive way’ (which there is no elaboration on, what is a ‘more positive way’).

A1.43. Site specific landscape character – Paragraph 7.1.36 gives a summary of the character of the site, this does not follow the methodology set out in the published guidance and lacks a proper consideration of all of the aspects of the landscape, both physical and perceptual.

A1.44. Overall, the landscape character baseline is very weak, NCA 129 has been omitted from the baseline description, relevant key characteristics have not been identified, individual elements and features characteristic of the landscape have not been identified, the value/importance of characteristic features has not been identified, there is no summary/conclusion of the character to take forward in the assessment and to understand what mitigation/enhancement potential there could be through the development.

- Visual Baseline Review: The study area must be defined and the desk study must clearly explain the nature of visual amenity along with approximate visibility of the development and potential visual receptors. The field survey must confirm the extent of visibility, representative viewpoints and visual receptors.

A1.45. The study area is based upon mapping of the Zone of Theoretical Visibility produced and subsequent field work. This is within good practice guidance however paragraph 7.20 of GLVIA3 states that when defining a study area “as with other aspects of cumulative effects, it will be important to agree with the competent authority and other stakeholders both the approach to defining a study area and the resulting proposed study area” which has not been done the ZTV does not include the likely visibility of the associated infrastructure, road upgrading and traffic movements.

A1.46. Within the ‘further baseline work to be undertaken’ section, it is accepted that viewpoints will be agreed. However, this has not been done yet and so the visual assessment section of the report has not been agreed with the LPA.

A1.47. There is a brief description of where views of the site can be seen within paragraph 7.1.40 where it states that the woodland restricts views from the north, west and southwest. However, there is no description of the visual envelope, and the character and composition of the views experienced.
A1.48. Views are described in order from the AONB, North, East, South and West. There is no plan to show these locations or photographs to illustrate the composition of the views. Within paragraph 7.1.43 there is a summary of what the development might look like within the landscape and suggestions mitigation. The sentence ‘while some aspect of the development would inevitably be seen, with careful design and restrictions on very tall buildings it would not draw the eye or be conspicuous to an extent that it would harm the enjoyment of the AONB’ appears to suggest design development options have been considered. There is no analysis of the impacts on localised views.

A1.49. Visual receptors – a series of visual receptors have been identified within paragraph 7.1.54 but need to be agreed with the LPA. Without a plan to illustrate the distribution and location of these receptors it is not possible to determine whether all receptors have been identified.

Identification and Assessment of Landscape and Visual Effects
- Identify systematically the likely effects of the development during construction and operation and assess the nature and significance of these effects in a logical and well-reasoned manner

A1.50. Not applicable at this stage.

- Indicate measured proposals to avoid, reduce, remedy or compensate for those effects (mitigation measures) Significant adverse impacts should be considered for mitigation and specific mitigation measures put forward where practicable – where assumptions are made on the effectiveness of measures these should be stipulated

A1.51. Not applicable at this stage.

- Landscape effects: Consideration should be given to the sensitivity of the landscape resource, the scale/magnitude of landscape effect and significance as well as the identification of residual effects after further mitigation proposed through the LVIA

A1.52. Not applicable at this stage.

- Visual effects: Consideration should be given to the identification of effects, sensitivity of visual receptor, scale or magnitude of visual effects and significance as well as the identification of residual effects after further mitigation proposed through the LVIA

A1.53. Not applicable at this stage.

Presentation of findings
- The text needs to be impartial, to the point with definitions provided supported by a glossary of terms and full references. Minimal technical terms should be used

A1.54. LVIA - Under each section (landscape policy, landscape character and visual assessment) there is no summary of the key findings. It is not possible to pick out the key issues/opportunities/constraints to development of this site.

A1.55. There are no definitions as to the key terms in the context of this report. e.g. ‘quality’, ‘sensitivity’, ‘magnitude’ and ‘significance’. 
A1.56. Where summaries and suggestions are asserted (for example paragraph 7.1.38 “a strategy to restore key characteristic features and manage the landscape in a more positive way would enhance local landscape character”) they are not backed by any analysis or data. The report lacks impartiality in this respect.

A1.57. There is no glossary of terms or full references. There are some references (GLVIA3 and landscape character assessment guidance) but there are no web links for example for the National Character Areas.

A1.58. Green Belt Assessment – There is no explanation as the purpose of this review; the extent to which it relies on other published information, and the approach and methodology adopted. The section regarding Wisley Airfield (C18) does not have a clear approach/methodology to the assessment and at paragraph 7.5.2 the sentence is incomplete.

A1.59. Figure 7.3 and associated text (paragraphs 7.5.5 to 7.5.10) separate the Wisley Airfield site into C18, I, ii, iii, v, and iv. There is no methodology as to the reasoning behind this segregation and how the outcomes from this exercise have been determined.

**Conclusion**

A1.60. The Technical Appendix 7 – Initial landscape, Visual and Green Belt Summary prepared on behalf of Wisley Property Investments Ltd lack clarity and purpose. The conflation of the landscape, visual and Green Belt issues in one documents leads to a degree of confusion in terms of the issues and conclusion.

A1.61. There is a lack of recognition of the distinction between landscape issues and the Green Belt. The Green Belt is a spatial planning designation and does not seek to protect areas based on their landscape character, quality or value. Whilst it is recognised that landscape architects do contribute to the analysis of Green Belt purposes, on the basis that the profession is familiar with and knowledgeable of suitable analytical techniques, that does not mean that the landscape and visual effects should not be considered as part of the planning balance regardless of the Green Belt implications.

A1.62. Given the magnitude of impacts for a new settlement at the Former Wisley Airfield it is essential that there is a robust and detailed understanding of the landscape and visual effects before any strategic planning decision is made. TA7 does not provide this assessment. There is an absence of a proper and detailed local character assessment, the visual context and how these would be affected by the creation of a new settlement. The report does not scrutinise the implications of development in sufficient detail to demonstrate that the landscape character can be conserved and enhanced and that development would not cause unacceptable harm.

A1.63. TA7 does not address the implications of the associated development relating to the highways, increased traffic and lighting which would affect a greater area than the redline.

A1.64. No decision to release this site for a new settlement should be made on the basis of the information provided in TA7, it is insufficient to determining the likely effects and the extent to which harm can be avoid, minimised or offset.
Plans & Photoviewpoints

Plan 1: Landscape Planning Policy
2275/P03a September 2014 CB/AW

Plan 2: Landscape Character – Published Context
2275/P04a September 2014 CB/AW

Plan 3: Topography
2275/P01a September 2014 CB/AW

Photoviewpoints
2275/P07 September 2014
Plan 1: Landscape Planning Policy

Former Wisley Airfield

As Shown (Approximate)

September 2014

CB/AW

Scale As Shown (Approximate)

0 500m

Site Boundary
Countrywide and Rights of Way 2000 - Access Layer (CRoW)
Thames Basin Heaths Special Protection Area (SPA)
Ancient Woodland
Policy WD2 of Surrey Waste Plan (2008)
Land at Former Airfield, Wisley
Public Footpaths
Bridleways

All of plan area is Green Belt
Project: Former Wisley Airfield
Plan 2: Landscape Character - Published Context

Context
2275/P04a
September 2014

Scale
As Shown (Approximate)

Drawing No.
2275/PO4a

Date
September 2014

Checked

Site Boundary

National Character Areas (NCA)

114
114: Thames Basin Lowlands

129
129: Thames Basin Heaths

Note: Information extracted from Natural England Character Area Profiles 114 and 129, 2014.

Landscape Character Areas (LCA)

A: River Floodplain
E: Wooded Rolling Claylands
G: Wooded and Settled Sand Heath
H: Gravel Terrace

Landscape Character Types (LCT)

A1: Lower Wey River Floodplain
E2: Ockham and Clandon Wooded Rolling Claylands
G2: Wisley Wooded Settles Heath
H1: Send Gravel Terrace


Note: Information extracted from Natural England Character Area Profiles 114 and 129, 2014.
Source: The plan has been modelled using GIS computer software (QGIS) and Ordnance Survey Terrain 5 data, and so such does not take into account built form or vegetation present within the landscape.
Views into the Site from the south
Views within and across the Site - Looking south
Views within and across the Site - Looking east
Views within and across the Site - Looking north