
From: Planning Consultations
Subject: MO/2025/0695 - Bull Hill, 480 dwellings up to 12 storeys in height , offices and multistorey car park and alterations and additions to the Swan Centre

From: Clive Smith
Sent: 12 February 2026 13:22
To: Munnis, Sherelle <>; Planning Consultations <
Cc: Rob Fairbanks EI
Subject: [EXTERNAL] MO/2025/0695 - Bull Hill, 480 dwellings up to 12 storeys in height , offices and multistorey car park and alterations and additions to the Swan Centre

Dear Sherelle,

I am grateful to you for seeking further information to be sent to me and indeed for the agent's response.

I do not consider that the proposals for the Swan Centre have any implications for the setting of the Surrey Hills National Landscape. Therefore this submission concentrates on the Bull Hill development proposals.

Preamble.

I consider two Surrey Hills National Landscape (SHNL) issues arise. The first is whether the proposed tall buildings would impact upon views from and into the SHNL and might harm its setting. The second is whether the magnitude of the proposed development would spoil the character of the relatively modest town of Leatherhead that is so closely related to the adjacent SHNL.

The site is owned by Mole Valley District Council that is party to the application. It can therefore be expected that the Council will be keen to determine the application in the way that is in the overall interests of the local community, importantly the future character of Leatherhead and the setting of the SHNL.

The application is very well documented.

Relevant National Landscape Planning Policies.

Government policy in the NPPF states with regard to the setting of National Landscapes that *"development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas."* That is discussed later.

Mole Valley Local Plan Policy EN8 Landscape Character includes the following:

4. When determining development proposals within the National Landscape, or affecting its setting, regard must be had to the Surrey Hills (National Landscape) Management Plan as a statutory document, and account will be taken of the environmental Design Guidance by the Surrey Hills Board.

5. Development proposals lying outside the National Landscape but which would spoil its setting by harming public views into or from the National Landscape will be refused."

The new Surrey Hills National Landscape Management Plan 2025-2030 having been formally adopted and therefore a statutory document includes the following relevant policy.

"P11. Development proposals outside the boundary of the Surrey Hills National Landscape must not cause harm to the setting of the National Landscape in terms of public views to or from it or generate harmful additional traffic flows along country lanes within the National Landscape. "

National Landscape Planning Assessment.

The several documents forming part of the TVIA include many photographs and photomontages. However, the Townscape and Visual Impact Assessment (TVIA) is more about "townscape" than "landscape" as compared to a Landscape Visual Impact Assessment(LVIA) which in this case would concentrate upon views from and into the SHNL.

However, the TVIA does include 3 views from Norbury Park. 3 of these are from the SHNL, namely, from Norbury Park. 2 are indicated to be inconsequential although the broken yellow outline of the proposed buildings, possibly behind trees, as are shown in other proposed views in the TVIA, have not been included and so one cannot be confident. Moreover, caution has to be expressed with both TVIA and LVIA's because they can only show snapshots at one moment in time. Trees are transient landscape features and can be lost for either natural or human induced reasons. Consequently, existing trees screening a view may not exist during the life of the development.

The view 3 in the TVIA from Bocketts Farm clearly shows the proposed buildings both rising above others in Leatherhead and being bulkier. Bocketts Farm is within the SHNL and attracts many visitors and so this view and others from Bocketts Farm are publicly important. In my view, the development would change the present perception of Leatherhead as having little urban impact in the setting to SHNL to one that would be greater.

The more open parts of Norbury Park Farm and the long distance path bordering the River Mole may offer views into Leatherhead town centre that may be impacted. The development may also be visible from the high ground of Mickleham Downs which offers extensive views. Cherkley, not the golf course, and Tyrrells Wood are proposed by Natural England to be included in the Surrey Hills National Landscape. Currently that does not have the status and carry the great weight of a designated area, but Natural England consider that when its proposed extensions to the SHNL are submitted to the Secretary of State probably in June they will carry great weight.

Conclusions.

I am in some difficulty from the information available in giving firm and demonstrable advice as to whether the proposed tall buildings up to 12 storeys in height would harm the setting of the SHNL. But I anticipate they would do so. Further, the degree of any harm will be for the Planning Authority to weigh in the balance with other relevant planning considerations. But Local Plan Policy EN8 Landscape Character is firm in stating that development outside the National Landscape that *"would spoil its setting by harming public views into of from the National Landscape will be refused"*; not is likely to be refused. The SHNL Management Plan setting policy is also firm in stating *"must not cause harm to the setting"*.

Currently, Leatherhead does not have any buildings approaching the proposed taller buildings and the built up area does not spoil views from the SHNL. Also, Leatherhead benefits from many views within the built up area into the higher ground of the SHNL to the south on both sides of the River Mole. Whether the proposed tall buildings would interfere with those views is difficult to ascertain. But I consider that the heights and bulk of proposed development would be so very different and more akin to city development that it would be risky and potentially dangerous to

permit the application unless other exceptional circumstances, possibly only including the need for more housing, would be mean that the harm is clearly outweighed in the public interest. Certainly the site offers the scope to be developed for considerably more dwellings but it is unclear whether it is absolutely necessary for it to be overdeveloped as proposed. The Council may therefore consider that harm to the setting of the SHNL and adverse change to the character of Leatherhead so closely related to the SHNL should, in the balance of planning considerations, contribute to the application being refused or being withdrawn for a less harmful development proposal to be submitted.

Clive Smith
Surrey Hills National Landscape Planning Adviser

