

Eye and Dunsden Neighbourhood Plan: Publicity Period on the Landscape Character Assessment Addendum

Response number	Date	Name	Organisation	Link to response	Public hearing	Made plan notification
1	12 August 2026	Cllr Leigh Rawlins		<i>Full response available on page 2</i>	No, I do not request a public hearing	
2	27 August 2026		Historic England	<i>Full response available on page 3</i>	No, I do not request a public hearing	
3	1 September 2026		South Oxfordshire District Council	<i>Full response available on page 4</i>	Don't know	
4	3 September 2026		Gladman Developments Limited	<i>Full response available on page 5</i>	Not answered	

Response 1: Cllr Leigh Rawlins

I am very supportive of the work done by the NP and its consultant - including the addendum. Their work is very thorough, detailed and produced with appropriate professional input. I commend it.

What changes do you consider necessary for the plan to meet the basic conditions?

I do not see a need for change.

Response 2: [REDACTED], Historic England

Historic England has no comments to make on the Addendum to the Eye and Dunsden Parish Landscape Character Assessment.

Response 3

Policy and Programmes

DIRECTOR: TIM ORUYE



Listening Learning Leading

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01 September 2026

**Eye and Dunsden Neighbourhood Development Plan – Comments on the
Publicity Period on the Landscape Character Assessment Addendum**

South Oxfordshire District Council has worked to support Eye and Dunsden Parish Council in the preparation of their neighbourhood plan

In order to fulfil our duty to guide and assist, required by paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended), the council commented on the emerging Eye and Dunsden Neighbourhood Development Plan (NDP) during the pre-submission consultation, the post-submission publicity period, and the publicity period on modifications in response to Sections 98 & 99 of the Levelling Up and Regeneration Act 2023.

We have reviewed the Landscape Character Assessment Addendum in consultation with the relevant Council specialists and have no further comments to make at this stage.

[REDACTED]

Planning Policy Team Leader (Neighbourhood)

By email to: planning.policy@southandvale.gov.uk

3rd September 2026

Eye and Dunsden Neighbourhood Plan – Landscape Character Assessment Addendum consultation

Dear Sir/Madam,

Gladman welcomes the opportunity to comment on the Landscape Character Assessment Addendum. The Addendum directly responds to the submission Gladman made at Regulation 16 regarding the Landscape Character Assessment and policy ED-VL1.

Randall Thorpe on behalf of Gladman, undertook a peer review of the original Eye & Dunsden Parish Landscape Character Assessment and Proposal for a Local Valued Landscape (LCA&PLVL), and that of the South Oxfordshire and the Vale of White Horse (September 2024). The Comments made within Gladman's Regulation 16 response and Appendix 1 of that response still stand.

The documents published as part of this consultation are still marked as 'draft'. Therefore, for clarity, the comments made in this response relate to the draft Addendum Eye and Dunsden Parish Landscape Assessment and Proposal for Local Valued Landscape June 2026 (dated 8th June 2026). If the document is updated to a final version a further consultation should take place.

Furthermore, the Landscape Assessment and Proposal for Local Valued Landscape is also still marked as draft. The version which we have commented on is the 26th April 2022 version.

The Addendum makes comments on the Parish Councils use of Box 5.1 rather than the updated TGN02/21. The Parish notes the similarities to the two parts of guidance. While it is noted that there are some similarities, it would have been clearer to provide an update of the assessment. In this regard, we note that TGN02/21 moves matters on from Box 5.1, by highlighting additional or refined factors that should be considered when identifying landscape value. Whilst noting that it is intended to be complimentary to Box 5.1, we submit that it should have formed the starting point for preparing the LCA&PLVL as the most up-to-date guidance at the time of its preparation.

In this regard, it is noted that the Local Landscape Designation Review for South Oxfordshire and Vale of White Horse 2024 (LLDR) did use the most up to date guidance. A further peer

review of the LLDR was also completed as part of appendix 1 of Gladman's Regulation 16 submission and in addition a submission was made to the Joint Local Plan Regulation 19 consultation. This can be found at appendix 1 of this submission.

While it is noted there are some similarities between Box 5.1 and TGN02/21, we submit the assessments the Parish Council and the Joint Local Authorities have undertaken remain flawed, and the concerns we have previously raised still stand throughout our submissions.

A summary of the concerns can be found at page 3 and 4 of the Randall Thorpe peer review 2026. Some of the key limitations of the assessment are as follows:

- The Landscape Character Areas used were not appropriate,
- There should have been 6 Landscape Character Areas assessed not 4,
- The assessment fails to include an assessment of negative factors,
- The assessment fails to make a judgement of relative value and therefore it is not possible to see how each landscape character area is elevated above the ordinary,
- The assessment should not use local landscape designation as factors in determining landscape value,
- The assessment does not judge the overall weight of the evidence when coming to an overall conclusion for any landscape unit,
- The conclusion that all the land within the parish should be a valued landscape is not a robust conclusion. The use of valued landscape has been overused and contrary to the guidance given in TGN02/21. It is not based on clear, transparent methodology.

Accordingly, the limitations of the LCA&PLVL go beyond its assessment of value relying on Box 5.1, and notwithstanding the publication of the Addendum, our broader concerns on its limitations remain outstanding

The addendum makes a note about the publication of NPPF 2026 however, it is noted that the Eye and Dunsden Neighbourhood Plan should be examined under the NPPF 2024 in accordance with Annex A of NPPF 2026.

The relevant paragraph in NPPF 2024 includes a reference to valued landscape at paragraph 187, which states that valued landscape should be protected and enhanced. However, notwithstanding this, Gladman does not believe the land identified by the Parish Council consists as a valued landscape.

Furthermore, we would observe that the NPPF 2026 does not include any reference to 'valued landscape'. N1 discusses plan making in relation to identifying environmental opportunities and safeguards. Paragraph 1a of N1 states that plans should set out a hierarchy of international, national and locally designated sites and areas of importance for their landscape, geodiversity or biodiversity. Features should be identified which require particular consideration in managing development due to environment value.

The blanket allocation of policy ED-VL1, together with the assessment, does not identify clear features as to why the landscape should be protected in such a way. The assessment completed by Randall Thorpe provides a thorough assessment providing locations which should have an elevated value based on up-to-date guidance and identifies clear features

within the Landscape character areas which have the potential to have an elevated value. This does not cover the vast area identified within policy ED-VL1.

The addendum does not change Gladman's comments on the policy ED-VL1 and the Landscape Assessment and Proposal for Local Valued Landscape. For a landscape to be considered to be valued it must be taken out of the ordinary. The evidence provided does not demonstrate that there is an elevated value across the whole area.

The Parish has not engaged with the detail of the peer review submitted by Gladman at Regulation 16. The assessment submitted by the Parish Council is not robust and should follow the most up to date guidance.

Gladman has looked at both the evidence put forward by the Parish Council and that of the District Council in relation to the Joint Local Plan. It should be noted that the hearing sessions for the Joint Local Plan 2041 for the landscape policies have not yet taken place and therefore it may be considered that the valued landscape policy NH5 included within the JLP may not be considered to be sound.

Gladman consider that policy ED-VL1 should be removed from the Neighbourhood Plan. The policy is not supported by evidence to support the designation of valued landscape.

Yours faithfully


Planning Manager
Gladman Developments

APPENDIX 1 – Peer review submitted as part of Joint Local Plan Regulation 19



Peer Review

Of

Local Landscape Designation
Review of South Oxfordshire and
Vale of White Horse

And related documents and
draft policy

For



6th November 2024



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Figure 3: Distribution of LCAs from 2024 Assessment

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1. Introduction

- 1.1. This Peer Review has been prepared by Dick Longdin (FLI) of Randall Thorp on behalf of Gladman Developments. Its purpose is to consider the methodology and conclusions of the '**Local Landscape Designation Review of South Oxfordshire and Vale of White Horse**' (Final report Prepared by LUC September 2024) (LLDR'24) and consider its robustness as a piece of work to identify and assess 'valued landscapes' and the appropriateness of the areas identified for Local Landscape Designation to be described as 'District Valued Landscapes' in emerging policy NH5 of the **Joint Local Plan, Pre-submission publication version; South Oxfordshire and Vale of White Horse District Councils** Oct 2024 (JLP'24).
- 1.2. Site survey work and findings of earlier work within the area by the same author are used to provide detailed examples of what may be weaknesses and flaws within LLDR'24.
- 1.3. Site visits have previously been carried out to the area in July 2022 and January 2024 as part of the earlier work.

Structure of the Review

- 1.4. In order to properly review LLDR'24, it is necessary to understand what is meant by Local Landscape Designation, Landscape Character Assessment, landscape value and 'valued landscapes' and what guidance is available to assess and make judgements about these. It is then possible to review the LLDR'24 to assess if it follows published guidance and hence determine whether its findings are robust.
- 1.5. LLDR'24 uses Landscape Character Types/Areas from the **Landscape Character Assessment for South Oxfordshire and Vale of White Horse District Councils** Sep 2024 (LCA'24) as the basis for scoping potential areas as 'candidate' areas for local landscape designation. LCA'24 uses the findings of **Tranquillity Assessment – Final Report, South Oxfordshire and Vale of White Horse District Councils** August 2024 (TqA'24) to identify relative tranquillity as one of the characteristics within landscape character areas / types. It is therefore necessary to review both documents.
- 1.6. This review is structured as follows:
 - Summary
 - Published guidance, and the meaning of, Local Landscape Designation, Landscape Character Assessment, Landscape value and 'valued landscapes'.
 - Review of TqA'24
 - Review of LCA'24
 - Review of LLDR'24
 - The Chilterns Dipslope LLD, example
 - Review of draft policies within JLP 2024
 - Conclusion

Background documents

1.7. The following documents have been studied as part of this review:

- **Joint Local Plan, Pre-submission publication version; South Oxfordshire and Vale of White Horse District Councils** Oct 2024 (JLP'24)
- **Local Landscape Designation Review of South Oxfordshire and Vale of White Horse** Sep 2024 (LLDR'24)
- **Landscape Character Assessment for South Oxfordshire and Vale of White Horse District Councils** Sep 2024 (LCA'24)
- **Tranquillity Assessment – Final Report, South Oxfordshire and Vale of White Horse District Councils** August 2024 (TqA'24)
- **South Oxfordshire Landscape Character Assessment** 2017 (SOLCA'17)
- **South Oxfordshire Landscape Character Assessment** 2003 (SOLCA'03) (dated 1998)
- **Vale of White Horse Landscape Character Assessment** 2017 (VWHLCA'17)
- **National Planning Policy Framework** Dec 2023 (NPPF)
- **Chilterns Area of Outstanding Natural Beauty Management Plan** 2019-2024 (CAONBMP)
- **LI TGN 02-21 Assessing Landscape Value outside National Designations: 2021** (TGN'21) The Landscape Institute
- **Guidance on Designating Local Landscape Areas** 2020 (GDLLA'20)
- **An Approach to Landscape Character Assessment: 2nd edition** 2018 (ALCA'18) Natural England
- **Landscape Character Assessment: Guidance for England and Scotland: 2002**, The Countryside Commission and Scottish Natural Heritage (LCAG'02).

1.8. The following planning appeals and High Court judgements are referred to within this review:

- **North of Ashford House, Ashton Road, Lancaster**, June 2024. Planning Appeal ref: APP/A2335/W/23/3335117
- **Stroud District Council v SoSCLG** 2015. EWHC 488
- **West Street, Coggeshall**, July 2017. Planning Appeal ref: APP/Z1510/W/16/3160474
- **Land north of Crown Road, Marnhull**, April 2022. Planning Appeal ref: APP/D1265/W/21/3289314

1.9. Information sources include the following:

- **OS 1:25,000 mapping** (showing contours): Topography and landform; land uses including woodland, water, sports areas, golf courses, plant nurseries, settlements, hamlets, farmstead and urban areas; large utilities (electricity lines/pylons, reservoirs, water towers); field boundaries/enclosure; roads, Public Rights of Way; Horse paddocks (small rectangular field enclosures)
- **OS six-inch 1830s-1880s mapping**: Historic field boundaries.
- **DEFRA Magic Map web site** (information about the natural environment from across HM Government): National Trails; National cycle network; village greens; Millenium greens; Registered commons; Country Parks; Open access land; Local nature reserves; National nature reserves; SSSIs; Special areas of conservation; Scheduled monuments; Listed buildings; Registered parks and gardens; Priority habitat grasslands; Priority habitat meadows; Priority habitat Heathland; Priority ponds; Chalk rivers; Ancient woodland; Deciduous woodland; Wood pasture and parkland.
- **Google aerial imagery**: Broad indication of: woodland; grassland; arable land; indication of hedgerow removal (cop marks, cultivation patterns); Golf courses and sports fields; Horse paddocks (small rectangular field enclosures); settlements and urban areas.
- **South Oxfordshire District Council Adopted policies map 2020**: Local green space; Conservation areas;

2. Summary and conclusion

Overall conclusion

- 2.1. I consider that LLDR'24 fails to meet up-to-date national guidance on designating local landscapes and assessing landscape value.
- 2.2. I do not consider that the candidate Chilterns Dipslope LLD meets the criteria for designation. I consider the extent of the area to be too broad and I can find no evidence to demonstrate that the area has '*qualities to elevate it above other more everyday landscapes.*'
- 2.3. Given that the example LLD studied in detail fails to meet the criteria for valued landscape or local designation, I consider it reasonable to question the robustness of other candidate LLDs.
- 2.4. I consider that candidate Local Landscape Designations (LLDs) should be focused on smaller, exceptional areas with unique, highly valued characteristics, evidenced using the guidance in TGN'21, rather than broad, overlapping areas that may dilute their significance.
- 2.5. From my review of LLDR'24 I do not consider that there is sufficient robust evidence to justify the identification of the candidate LLDs and therefor policy NH5.

Relationship with other documents

- 2.6. LLDR'24 uses Landscape Character Types/Areas from the Landscape Character Assessment for South Oxfordshire and Vale of White Horse District Councils Sep 2024 (LCA'24) as the basis for scoping potential areas as 'candidate' areas for local landscape designation. LCA'24 uses the findings of Tranquillity Assessment – Final Report, South Oxfordshire and Vale of White Horse District Councils August 2024 (TqA'24) to identify relative tranquillity as one of the characteristics within landscape character areas / types. It is therefore necessary to review both documents.

Review of The Tranquillity Assessment for South Oxfordshire and Vale of White Horse 2024 (TqA'24)

- 2.7. TqA'24 aims to evaluate and map tranquillity levels in the districts, which are important for understanding landscape character and value. It uses various indicators categorised as positive or negative to gauge tranquillity without seemingly including external data from beyond the administrative boundaries.
- 2.8. Some significant large electricity pylons, overhead power lines, telecommunication masts and concrete water tower have not been included in the mapping of negative features.
- 2.9. The methodology specifies that a 6 km distance should be used to model visibility limits. However, there is no indication that data was considered beyond the boundaries of the Districts.

- 2.10. These oversights could lead to significant discrepancies and errors in the result of TqA'24, as it fails to account for some significant negative features and may not account for tranquillity indicators outside the Districts that could be perceived from the edges of the Districts.

Review of the Landscape Character Assessment for South Oxfordshire and Vale of White Horse District Councils Sep 2024 (LCA'24)

- 2.11. LCA'24 replaces the 2017 assessments, which identified over 330 District level LCAs and 36 Landscape Character Types (LCTs) combined for both districts.
- 2.12. The new assessment identifies 14 LCTs and 44 District level LCAs, consolidating previous classifications into larger, more generalised categories. This shift is seen as diminishing the unique characteristics of smaller landscape units recognised in earlier assessments.
- 2.13. I consider that the amalgamation of LCTs into broader categories has resulted in a loss of specificity and detail regarding the unique identities of landscape units. This is exemplified by LCT4 (Wooded Chalk Plateau and Valleys), which I do not believe accurately reflects the distinct characteristics of its components.
- 2.14. The assessment lists valued qualities, despite the fact that LCA should be neutral and not include assessments of value.
- 2.15. There are contradictions in the description of example LCT4: eg. it states it is '*A heavily wooded landscape*', but goes on to describe it as '*Predominantly arable, with some pasture fields*', undermining the clarity of its identity.
- 2.16. The assessment's list of valued qualities for LCT4 fails to differentiate between areas within the Chilterns National Landscape (CNL) and those outside it, leading to an inaccurate application of characteristics. Various detracting features, such as urban edges and infrastructure, are also noted as impacting the landscape's value.
- 2.17. The guidelines presented in LCA'24 lack differentiation between areas within and outside the CNL, potentially restricting development in areas that do not share the same sensitivities.
- 2.18. Two examples illustrate the issues with the broader classifications. Both examples demonstrate significant differences in landscape character that suggest the need for more localised assessments.
- 2.19. I conclude that the LCA'24 does not follow recognised guidance and does not adequately reflect the diverse and unique landscape characteristics recognised in earlier assessments. Overall, I consider that a more nuanced approach to landscape assessment is required that recognises the unique characteristics of smaller landscape units.

Review of 'Local Landscape Designation Review of South Oxfordshire and Vale of White Horse' (LLDR'24)

- 2.20. LLDR'24 is based on existing guidance and LUC's own experience, although specifics of how LUC's experience differs are not fully explained.

- 2.21. The study uses LCA as the start of its scoping exercise and says that it excludes areas within nationally designated landscapes. However the scoping for LCA4 that is partially covered by the Chilterns National Landscape (CNL) incorporates criteria that is only located within the CNL.
- 2.22. LLDR'24 draws from the latest guidance (TGN'21), but it lacks the detailed indicators and evidence examples provided by TGN'21, making the methodology less transparent.
- 2.23. LLDR'24 uses a three-point RAG (Red-Amber-Green) rating system, which is less nuanced than the recommended "high, medium, low" system. The scoping also emphasises positive attributes without fully accounting for detracting characteristics. I consider the scoping skews the results to include landscape units that should not meet criteria for further assessment of value.
- 2.24. I consider that LLDR'24 fails to provide key essential information recommended by national guidance, such as clear reasons for designation and specific evidence of landscape value. The Statement of Significance provides only broad descriptions without detailed assessments of how well each criterion is met.
- 2.25. I consider that a review of smaller-scale units would be more accurate. Where a landscape unit is close to a national designation, I consider a more selective application of 'valued landscape' should be used to ensure these designations are reserved for landscapes that are genuinely 'Out of the ordinary'.

The Chilterns Dipslope LLD (CD LLD) example

- 2.26. The Chilterns Dipslope Local Landscape Designation (LLD) is used as an example, evaluating its boundaries, characteristics, and compliance with designation criteria. Key findings are:
1. **The scoping** describes the landscape as having significant woodland coverage, but this seems more reflective of areas within the CNL than the Chilterns Dipslope area, which is predominantly arable. I consider there are inaccuracies with the description, particularly references to parkland estates and heathland that only exist within the CNL.
 2. **The Statement of Significance** lacks clarity on why and to what degree special qualities or factors are valued. I consider a more transparent evaluation should be presented, using best practices in TGN'21 to detail how the landscape meets designation / valued landscape criteria.
 3. **Local Distinctiveness and Sense of Place:** Evidence indicates that the candidate LLD lacks many qualities found in the CNL and has fewer valued characteristics.
 4. **Scenic, Natural, and Cultural Qualities:** Several detracting features, such as large, amalgamated fields and infrastructure like high-voltage electricity lines, reduce the area's value.
 5. **Recreational and Associational Value:** Recreational features like golf courses are considered ordinary, and cultural associations are minimal.
 6. **Landscape Value Assessment:** Based on mapping, aerial imagery, and field study, I consider that the Chilterns Dipslope LLD has only medium value, representing an ordinary landscape without exceptional qualities. The eastern portion, in particular, is of low landscape value due to the many detracting features.
- 2.27. While the Chilterns Dipslope has pockets of higher-value landscapes, it lacks distinctive qualities that would elevate it above everyday landscapes. This aligns with the Crown Road case, which found no unique

characteristics warranting higher protection. I consider that this area should not be designated as an LLD and a more selective, small-scale approach for other candidate LLDs in LLDR'24 is adopted to avoid including ordinary landscapes and detracting features.

Relationship to draft policies

- 2.28. The draft policies in the Joint Local Plan (JLP'24) address landscape conservation, biodiversity, historic preservation, and design requirements for development. Key policies include:
- **DE1 and DE2:** Require high-quality design that enhances local identity and integrates with the landscape, respecting historic context and local character.
 - **NH1 and NH3:** Protect biodiversity sites, ancient woodlands, trees, and hedgerows, and emphasize retaining natural elements.
 - **NH6:** Calls for developments to respect landscape character, preserve settlement character, and maintain separation between settlements.
 - **NH8-NH12:** Focus on conserving heritage assets, listed buildings, conservation areas, archaeological sites, historic battlefields, and registered parks and gardens.
 - **NH5:** Defines 'District-valued landscapes', requiring developments in these areas to align with the Valued Landscapes Assessment. However, I consider that this terminology may lead to confusion with "valued landscapes" as used in national planning guidance.
- 2.29. I consider there is overlap in the landscape policies, particularly between NH5 and other landscape-related policies.
- 2.30. From my review of LLDR'24 I do not consider that there is sufficient robust evidence to justify the identification of the candidate LLDs and therefor policy NH5.

3. Published guidance on (and the meaning of) Local Landscape Areas, Landscape Character Assessment landscape value, 'Valued Landscapes'.

Local Landscape Areas (LLA) for designation

3.1. As stated in para 2.5 of LLDR'24, the most up to date published guidance is **Guidance on Designating Local Landscape Areas 2020** (GDLLA'20).

3.2. GDLLA'20, page 14, Fig 2 sets out the key steps in local landscape area designation. Step 4 states:

- Existing landscape studies inform selection of candidate LLAs.
- New studies may extend understanding of landscapes and place.

3.3. Para 2.2.5 discusses how national designations (such as the National Landscapes) affect LLA designations in an authority:

'Local authorities with a high proportion of their area designated nationally ... should consider the purpose and extent of their LLAs carefully. Equally, all local authorities should explore the relationship between LLAs and other national and local designations.'

3.4. Para 2.2.6 discusses the relationship between LLAs and other landscape policies:

'The fit with local authority-wide landscape policies may also be important in determining coverage of LLAs. For example, if a significant number of these policies are essentially protective in nature, a large number of LLA designations may not be required. An important factor to consider is the range and extent of other designations and approaches which may be as or more effective than designation in delivering the desired objectives.'

3.5. Paras 2.4.7 – 2.4.10 set out the methodology for selecting landscapes for designation. Key points include:

2.4.7: 'The assessment methodology must identify a way of evaluating the criteria to allow justifiable conclusions on which landscapes are suitable for designation. The appropriate method must identify and describe the special characteristics relevant to the study area...'

2.4.9: Ranking should be applied based on a qualitative description. This is where the relative value of each landscape unit is assessed in a systematic, criteria-based manner, and can be given values such as 'high', 'medium' or 'low'. Such an evaluation can help comparison between landscape units and identifies those ranked highly which are then considered as candidates for designation...'

2.4.10: It is important to clearly describe the factors considered, to relate them to each of the assessment criteria, and to set out the judgements used to identify and select landscapes for designation.'

3.6. Paras 2.5.2 – 2.5.6 discuss the relationship between Landscape Character Assessments and LLAs. Key points

include:

2.5.2: Landscape Character Assessment (LCA) identifies, describes, classifies and maps what is distinctive about our landscapes. ...

2.5.3: Landscape Character Assessment ... can be used as a basis to inform judgements on the particular merits of landscapes being considered for designation.

2.5.4: The Landscape Character Types may not be detailed enough to inform an LLA designation process, so it may be necessary ... to carry out a more detailed LCA ...

2.5.6: many landscapes selected for designation are in places where different landscape character types meet. This arises because visual diversity and contrast are important in forming scenic quality. Landscape Character Assessments are a useful tool for analysis, but should not be used in isolation to identify landscapes for designation.'

3.7. Table 2, page 26 sets out the differences between landscape characterisation and landscape designation. Key differences are that the designation process identifies more discrete areas of landscape (than those identified in a LCA) and that these more discrete areas are considered to be of higher merit than the larger areas identified in the LCA.

3.8. Para 2.7.10 discusses naming of LLAs and states:

'We strongly encourage the use of the term Local Landscape Area [Name of place], or [Name of place] Local Landscape Area.'

3.9. Para 2.7.11 and table 3 on page 34 recommends good practice in writing a Statement of Importance for each identified LLA. The Statement of Importance should include (amongst other things):

- *'The reasons for designation and the criteria it met.*
- *A clear description of the landscape and why it is designated.*
- *What is valued and why.*
- *The boundary; outline why it takes this form.*
- *A broad justification for the designated area is needed.'*

3.10. Section 3 discusses Development plan policy. Para 3.4 states:

'The level of protection accorded to LLAs is a matter for each authority to set out through its Development Plan policy. The level of protection should not be as high as that given to international or national designations.'

SUMMARY OF LOCAL LANDSCAPE AREAS (LLA) DESIGNATION

1. The latest guidance is GDLLA'20.
2. Existing landscape studies should guide the selection of candidate LLAs, and new studies can enhance

understanding of local landscapes.

3. Local authorities with nationally designated areas need to carefully consider their LLA designations, exploring how LLAs relate to national and local policies.
4. A robust assessment methodology is crucial for evaluating landscapes suitable for designation. This includes systematic ranking based on qualitative descriptions, identifying special characteristics, and providing justifiable conclusions.
5. LCAs play a significant role in understanding landscapes, but may require more detailed analysis for LLA designation.
6. The designation process identifies more specific, higher merit landscape areas compared to broader classifications in LCAs.
7. GDLLA'20 encourages naming LLAs in a standardized format and provides guidelines for writing a Statement of Importance for each area. This statement should detail the reasons for designation, landscape description, values, boundaries, and justifications.
8. The protection level granted to LLAs is determined by each authority's Development Plan policy, which should be less stringent than that for national or international designations.
9. Overall, there should be a systematic, informed approach to LLA designation, integrating local studies and policies while ensuring clear communication of each area's significance.

Landscape Character Assessment (LCAss)

- 3.11. As set out in para 2.5.3 of GDLLA'20 (see above), *'Landscape Character Assessment can be used as a basis to inform judgements on the particular merits of landscapes being considered for designation.'* This is the approach taken by LLDR'24 to identify landscape units for the LLD desk-based scoping exercise.

- 3.12. The most up-to-date guidance on Landscape Character Assessment is **'An Approach to Landscape Character Assessment'**: 2018, (ALCA'18). This follows the earlier guidance published in **'Landscape Character Assessment: Guidance for England and Scotland'** 2002 (LCAG'02).

- 3.13. ALCA'18 Page 8 paragraph 1 defines landscape character as:

'a distinct and recognisable pattern of elements, or characteristics, in the landscape that make one landscape different from another, rather than better or worse. ... It seeks to identify and explain the unique combination of elements and features (characteristics) that make landscapes distinctive.'

- 3.14. Page 14 describes the product of a LCAss:

'The end product of the Landscape Character Assessment process will be an assessment consisting of a classification and map of landscape character areas and / or types, with associated descriptions of their character, and identification of key characteristics.'

- 3.15. Page 17, 1.7 makes it clear that Landscape character assessment is a neutral baseline. Any additional work such as judgements regarding landscape value are separate pieces of work.

LANDSCAPE CHARACTER CLASSIFICATION, TYPES AND AREAS

3.16. Page 44 of ALCA'18 describes the LCA final classification and description of landscape character types and areas:

'Landscape classification:

1. ... divides landscapes into areas of distinct, recognisable, and consistent character, and groups areas of similar character together;
2. can be carried out at any scale, and can thus provide information on the extent and distribution of different landscape character types and areas from national to local scale;
3. provides the spatially referenced framework on which landscape character descriptions, and follow on judgements ... may be based;

3.17. Page 45 goes on to explain the difference between Landscape Character Types and Landscape Character Areas.

'Important ... is the distinction between landscape character types and landscape character areas. These terms need to be used correctly and the differentiation between types and areas, identified at different levels in the hierarchy from national to local, needs to be understood.

Landscape Character Types (LCT):

- are distinct types of landscape that are relatively homogeneous in character;
- are generic in nature – they may occur in different areas ... and will share broadly similar combinations of geology, topography, drainage patterns, vegetation, historic land use and settlement pattern (this does not mean that every area within a particular type will be identical, but rather, that there is a common pattern which can be discerned in maps and in the fields survey records);
- may occur repeatedly in a study area, or occur in just one place;
- can be identified at each level in the hierarchy of assessment;
- can provide a good spatially referenced framework for analysing change (many influences and pressures affect areas with similar character in similar ways);
- when analysed, can provide a foundation upon which to develop planning and / or landscape management strategies.

Landscape Character Areas (LCA):

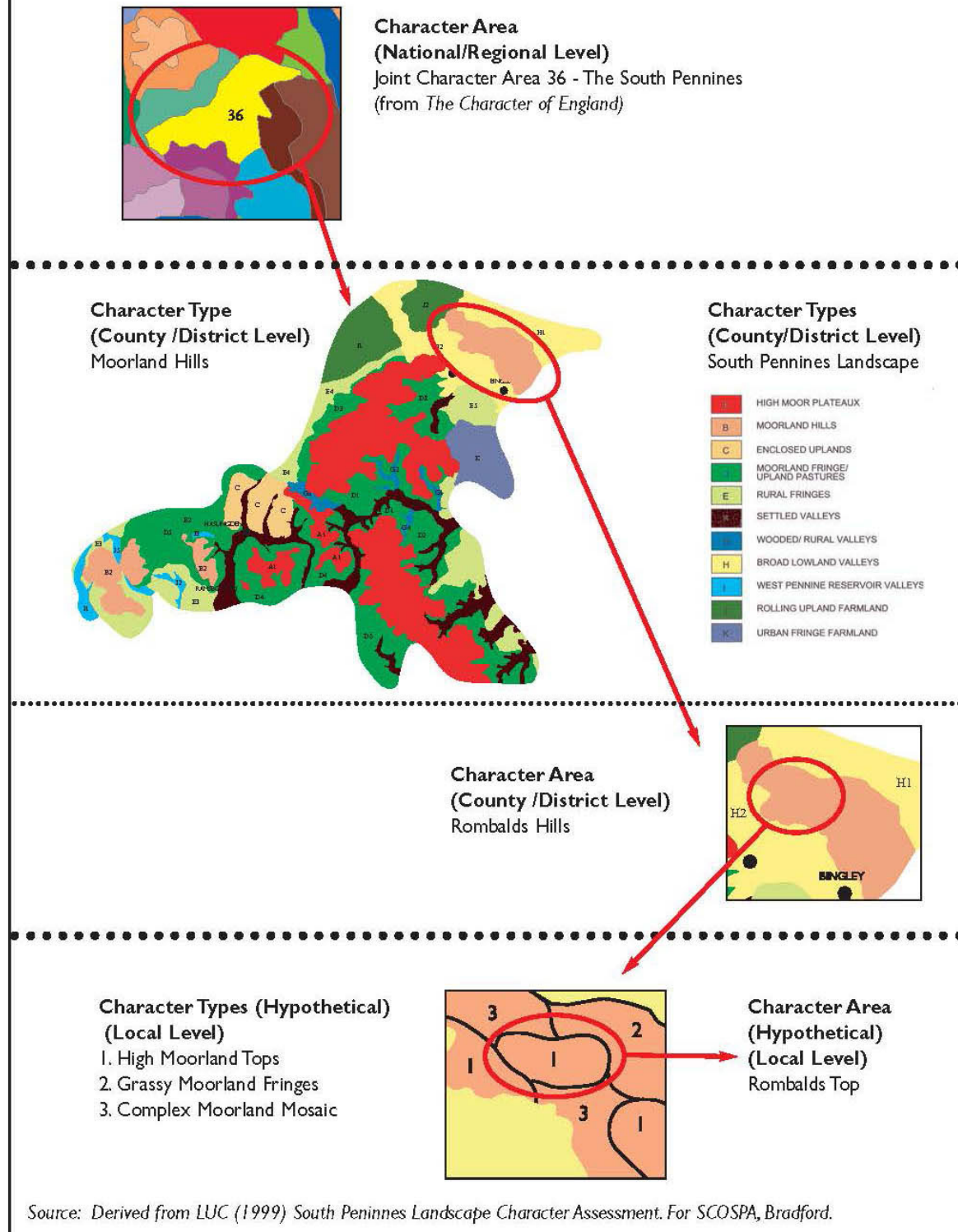
- are the unique individual geographical areas in which landscape types occur;
- share generic characteristics with other areas of the same type, but have their own particular identity;
- can often be more readily recognised and identified by non-specialists – sense of place is often important to local people and visitors for example;
- may often be more prevalent than landscape character types, because some types will occur in more than one area;
- can be identified at each level in the hierarchy of assessment;
- can provide a good spatially referenced framework from where patterns of local distinctiveness, and factors influencing sense of place, can be drawn;
- can be used to develop tailored policies and strategies, that reflect the characteristics that make a given landscape different or special.'

3.18. The difference between LCA and LCT can be confusing as the terms are repeated at differing levels of hierarchy in assessments, from national/regional level, through district level to local level. This is shown graphically in 'Landscape Character Assessment: Guidance for England and Scotland' 2002 (LCAG'02). Fig 2.3 (page 12 and below) shows:

- **Landscape Character Area** at a National/Regional level in the hierarchy.
- **Landscape Character Types** at County/District Level. The Regional Landscape Character Area is sub-divided into smaller units or Types. Landscape Character Type 'Moorland Hills' is a type, that occurs in 3 different locations within the larger LCA (as well as possibly occurring in other LCAs).
- **Landscape Character Areas** at a County/District level. The Area 'Rombolds Hills' is one of the 3 unique individual geographical areas that occur as part of the 'Moorlands Hills' Landscape Character Type.
- **Landscape Character Types** at a local level. The 'Rombolds Hills' could be further sub-divided into smaller landscape units.

Fig 1: LCAG, page 12, figure 2.3

Figure 2.3: The Landscape Character Assessment spatial hierarchy - an example of the relationship between the different levels [2]



SUMMARY OF LANDSCAPE CHARACTER ASSESSMENT

- 3.19. A Landscape Character Assessment:
1. Identifies and describes characteristics that make different landscapes distinctive.
 2. Maps and describes these different landscapes as Landscape Character Areas and/or Landscape Character Types.
 3. Can be carried out at National/Regional, County/District or Local level.
 4. Provides the spatially referenced framework on which follow on judgements may be based.
 5. Is a neutral baseline. Any judgement regarding the value of characteristics or the value of Areas or Types should be part of a separate section or document.

Landscape Value Assessment

- 3.20. Landscape character assessments can provide a basis to identify landscape units to be considered for designation. They are however a neutral baseline requiring further assessment on the value of the landscapes being considered for designation.
- 3.21. **TGN 02-21 Assessing Landscape Value outside National Designations** (TGN'21) is the most up-to-date guidance on assessing landscape value.

'It is intended to supplement existing ... guidance on Landscape Character Assessment and Landscape Sensitivity Assessment ... and Landscape and Visual Impact Assessment.' (Para 1.3.1)

'Landscape value can be assessed as an evaluation stage of a landscape character assessment or as a follow-on study. In this case landscape qualities will be identified in relation to individual character areas or types. Currently these are commonly described as 'valued landscape characteristics' or 'landscape qualities.' (Paragraph 2.2.2)

'Value is best appreciated at the scale at which a landscape is perceived – rarely is this on a field-by-field basis.' (Paragraph 2.4.5 bullet 6).

DEFINING LANDSCAPE PARCELS/UNITS FOR VALUE ASSESSMENT

- 3.22. TGN'21 recognises that value is best appreciated at the scale at which a landscape is perceived.
- 3.23. The *'scale at which landscape is perceived'* is not defined. When assessing landscape value, there has been a growing consensus regarding the importance of looking at the role that a potential development site plays in the wider landscape and not limiting the assessment to the site itself. The Inspector for APP/Z1510/W/16/3160474 (West Street, Coggeshall, July 2017) concluded at Paragraph 30 of her decision as follows:

'I consider that it would be too narrow to just consider the appeal site. A site might have a variety of characteristics but, taken in isolation, for some sites it would be difficult to assess whether those characteristics have any particular value or importance.'

Moreover, a site might be important because of its position in the landscape as part of it rather than being

important in its own right, rather like the pieces of a jigsaw puzzle. Further, as my colleague in the Nanpanton Road appeal sets out, the interactions between people and place are important in the perceptions of landscape and people will perceive the site in a wider context’.

3.24. Boundaries of landscape areas do not follow administrative boundaries. It follows that assessment of landscape areas should not limit their boundaries to administrative areas. Factors that enhance or detract from the value of a landscape area may be outside the administrative area, but still be perceived from within the landscape unit.

3.25. Page 45 of ALCA’18 explains that Landscape Character Types are distinct types of landscape that occur within the unique individual geographical areas of Landscape Character Areas.

3.26. Page 45 of ALCA’18 goes on to state that Landscape Character Types

‘can provide a foundation upon which to develop planning and / or landscape management strategies.’

3.27. TGN’21 para 2.2.2 suggests that Landscape value can be assessed in relation to individual character areas or types.

3.28. GDLLA’20, para 2.5.4 and 2.5.6 state:

‘Landscape Character Types may not be detailed enough to inform an LLA designation process, so it may be necessary ... to carry out a more detailed LCA’. ... Landscape Character Assessments are a useful tool for analysis, but should not be used in isolation to identify landscapes for designation.’

3.29. The Inspector for Appeal Ref: APP/A2335/W/23/3335117; North of Ashford House, Ashton Road, Lancaster, had to address the extent of the landscape to be considered as being perceived as a single landscape unit.

‘extent of the landscape experienced by those on the canal towpath which the proposal would potentially have an effect.’

3.30. This was a far smaller parcel than the district wide LCT or LCA within which the site was located but was the extent of the geographic area that was judged appropriate to be assessed for value.

3.31. I consider that GDLLA’20 and recent appeal decisions support the assessment of landscape value at District level should be a scale/grain smaller / finer than that of district wide LCTs or LCAs. This is further demonstrated in section 7 of this review, where the value of the large area of The Chilterns Dipslope LLD (CD LLD) is examined in detail.

ASSESSING VALUE

3.32. I consider it is the factors in TGN’21, Table 1 that should be considered when assessing landscape value to ensure the assessment follows the most up-to-date guidance.

3.33. TGN’21 Table 1 gives clear definitions, examples of indicators of landscape value and examples of evidence. This broadly presents the same factors as Box 5.1 from GLVIA3 but has been further refined and clearer guidance provided.

- 3.34. It is recognised in various guidance, including GDLLA'20, that the relative value of each landscape unit is assessed in a systematic, criteria-based manner, and should be given qualitative values such as 'high', 'medium' or 'low'.
- 3.35. The Planning Inspector for Planning Appeal ref: APP/A2335/W/23/3335117: North of Ashford House, Ashton Road, Lancaster, (June 2024) agreed that it was appropriate to assess landscape value with reference to Table 1 of TGN'21 and agreed with each parties approach of using a qualitative five point scale of: Low; Low-medium; Medium; Medium-high; High for each factor within Table 1.
- 3.36. Para 2.4.5 of TGN'21 makes key points on the practical application of the factors in Table 1, including the following:
- *'The factors to be considered are not fixed as they need to be appropriate to the particular project and location.'*
 - *'The indicators of value should be reviewed on a case-by-case basis, taking into account what they contribute (positively or negatively) to a specific landscape. The relative importance to be attached to each indicator is likely to vary across different landscapes. Once evidence for each factor has been collated and assessed, it is important to step back and judge the overall 'weight of evidence' in coming to an overall judgement on landscape value.'*
 - *'There are likely to be overlaps between the factors, as well as overlaps with other specialist studies for example in relation to natural and cultural factors. These overlaps should be acknowledged and considered when presenting conclusions on the overall value of the landscape.'*

'Valued Landscapes'

- 3.37. Appendix 4 of TGN'21 explains where the term 'valued landscapes' comes from and its meaning within the Planning System. Key points from Appendix 4 are summarised below:
- 3.38. In 2012, the first version of the NPPF was published. It included a policy (paragraph 109) which stated that *'The planning system should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes'*. No definition of a 'valued landscape' was given.
- 3.39. The current version of the NPPF (Dec 2023) has transposed paragraph 109, with modifications, to paragraph 180. This states:

Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)'*.

- 3.40. The interpretation of the phrase *'in a manner commensurate with their statutory status'* is relatively straightforward. Where a landscape has a statutory status, such as a National Park or National Landscape, it is a 'valued landscape.'
- 3.41. The interpretation of *'identified quality in the development plan'* is not clear. It may mean non-statutory, locally designated landscapes and/or any landscape where there is evidence to justify the identification of a 'valued landscape'. The judge in the case of Stroud District Council v SoSCLG 2015. EWHC 488 was clear about there being

a difference between 'valued' and designated:

'The NPPF is clear: designation is used when designation is meant and valued is used when valued is meant and the two words are not the same.'

- 3.42. TGN'21 states that Local designation alone may not be sufficient evidence. It is assumed that the word 'quality' means degree of excellence.

WHAT IS VALUED LANDSCAPE?

- 3.43. When making judgements regarding 'valued landscapes' TGN'21 notes the following key points:
- *'It is not possible to set a definitive threshold above which a landscape is considered to be a 'valued landscape'. It is a judgment that must be made on a case-by-case basis, based on the evidence. There should be a weight of evidence that supports the recognition of a landscape as valued above more everyday landscapes.'*
 - *The character and quality of landscapes are variable and what may be defined as reaching the 'valued landscape' threshold/criteria in one part of the Country may be considered to be an 'everyday landscape' in another.*
 - *It would be expected that a 'valued landscape' would demonstrate the presence of a number of indicators of landscape value, as set out in Table 1, although it is possible for one indicator to be of such importance (e.g. rarity, association or perceptual aspects) that the landscape is judged to be a 'valued landscape' even if other indicators are not present.*
 - *The identification of landscape value needs to be applied proportionately ensuring that identification of 'valued landscape' is not overused.'*
- 3.44. The NPPF does not define 'valued landscapes' nor does the PPG. it has been left to Planning Appeals and case law to describe its essential features.
- 3.45. Stroud District Council v SoSCLG 2015. EWHC 488 established that Valued Landscapes:
- Are those that are 'out of the ordinary'.
 - must be more than simply popular.
 - Have demonstrable attributes which would take the area beyond mere countryside.
- 3.46. TGN'21 defines 'Valued Landscape' as:

'an area identified as having sufficient landscape qualities to elevate it above other more everyday landscapes.'

- 3.47. The Planning Inspector for Planning Appeal ref: APP/A2335/W/23/3335117: North of Ashford House, Ashton Road, Lancaster, (June 2024) agreed with the above definition from TGN'21 (para 24).

WHAT IT IS NOT

- 3.48. In Stroud District Council v SoSCLG 2015. EWHC 488, it was established that having some characteristics that may have high value, does not necessarily mean the site (or unit) should be considered 'valued landscape' on the

whole. The Stroud Site was 150m from the Cotswold AONB and crisscrossed by well used public footpaths from which the AONB was visible. The Inspector did not regard these as attributes that took the site out of the ordinary and beyond mere countryside.

- 3.49. The judgement went further regarding the AONB, concluding that land from which the AONB could be seen does not have the same level of protection as views in conjunction with the AONB, from within the AONB.
- 3.50. The Inspector in the Crown Road case considered that site's value with regard to its contribution to nearby Conservation Areas, visual amenity, recreation and landscape character. The Inspector concluded:

'(The site) does not contribute to the significance of ... the ... Conservation Areas. Its value to local residents is undisputed but stems mainly from visual amenity including views and recreational considerations because of its location adjacent to existing housing. Its demonstrable physical attributes are not very different to many other fields and slopes around the village and in the locality generally including others crossed by public rights of way. It does not contribute to the wider landscape character any less or more than other similar fields around the settlement. Having regard to the advice in (TGN'21), ... the site does not deserve any higher level of protection that might be claimed under paragraph 174(a) of the NPPF.'

SUMMARY OF LANDSCAPE VALUE ASSESSMENT

1. The latest guidance is TGN 02-21, which complements existing frameworks by providing a structured approach to evaluating landscape value, identifying "valued landscape characteristics."
2. TGN 02-21 provides a systematic method for assessing landscape value, emphasizing that value is best understood at the perceptual scale.
3. Value assessments should consider the broader landscape context and not be confined to administrative boundaries. Various case law illustrates that landscapes should be viewed as interconnected units.
4. The assessment should utilise criteria from TGN 21, Table 1, which outlines indicators of landscape value. These indicators are to be assessed qualitatively, using a scale that ranges from low to high value.
5. The concept of 'valued landscapes' comes from the National Planning Policy Framework (NPPF). A valued landscape is characterized as having distinctive qualities that elevate it above ordinary landscapes, and its identification requires a case-by-case evaluation supported by substantial evidence.
6. The Stroud case clarified that not all areas with high-value characteristics qualify as valued landscapes; there must be demonstrable attributes that distinguish them from typical countryside.
7. The process of assessing landscape value requires both qualitative analysis and a broader perception of landscapes, drawing on established guidance and legal precedents to inform decision-making in planning contexts.

4. Tranquillity Assessment for South Oxfordshire and Vale of White Horse 2024 (TqA'24)

4.1. Para 1.2 describes the aim of the assessment:

'To assess, describe and map relative levels of tranquillity across South Oxfordshire and Vale of White Horse District Councils in a clear, consistent and comprehensive way. Tranquillity is a key factor contributing to landscape character and landscape value. This tranquillity assessment will inform the Landscape Character Assessment.'

4.2. Para 1.4 goes on to explain:

'Tranquillity in South Oxfordshire and Vale of White Horse District Councils has been mapped by combining sets of indicators that fall into 'positive' or 'negative' categories.'

4.3. The methodology describes how various indicators were used that covered the whole of South Oxfordshire and Vale of White Horse District Councils. Nowhere in the methodology does it state or suggest that indicators outside the administrative boundaries were included.

4.4. Para 2.30 explains that

'The CPRE methodology utilised a distance of 6 km to model the theoretical limit of visibility.'

4.5. From this, it seems reasonable to expect the data to extend 6 km outside the administrative boundaries to ensure that indicators that can be perceived from the edges of the Districts are accounted for. There is no evidence in the TqA'24 to explain to what extent this has been allowed for.

4.6. If this is an omission, it has the potential to create significantly different results to those that would be generated had the study area been extended by 6km, as both positive and negative factors occur outside the study area but in close proximity to the boundary that may be perceived from within the study areas may not have been accounted for (eg Urban / sub-urban areas, water, employment / industrial land).

4.7. Indicator NO3 is 'Seeing large non-natural infrastructure'. This includes 400kv pylons (and presumably overhead power lines) but excludes 132kv and 33kv pylons and overhead power lines within the Chilterns Dipslope LLD. It is unclear why all pylons are not taken into account as all are visually intrusive. Photograph 1, 2 & 3 (below) shows the line of (what I believe to be) 132kv pylons and overhead power lines to the east of Caversham extending north of Emmer Green. These have an adverse effect on tranquillity in areas from which they are visible.

Photograph 1: View from within the Chilterns Dipslope LLD looking south from Bridleway 205/17/10 west of Dunsden Green of 132kv and 33kv power lines



Photograph 2: View from within the Chilterns Dipslope LLD looking southwest from footpath 205/1/20 close to Comp Wood of 132kv and 33kv power lines



Photograph 3: View from within the Chilterns Dipslope LLD looking north from footpath 205/1/20 north of Bishoplands Farm of 132kv power lines



- 4.8. I consider the exclusion of negative features such as the above pylons and overhead power lines, as well as tall telecommunication masts and a tall concrete water tower to be an omission from TqA'24 that results in areas of lower tranquillity not being recorded.

SUMMARY

1. TqA'24 aims to evaluate and map tranquillity levels in the districts, which are important for

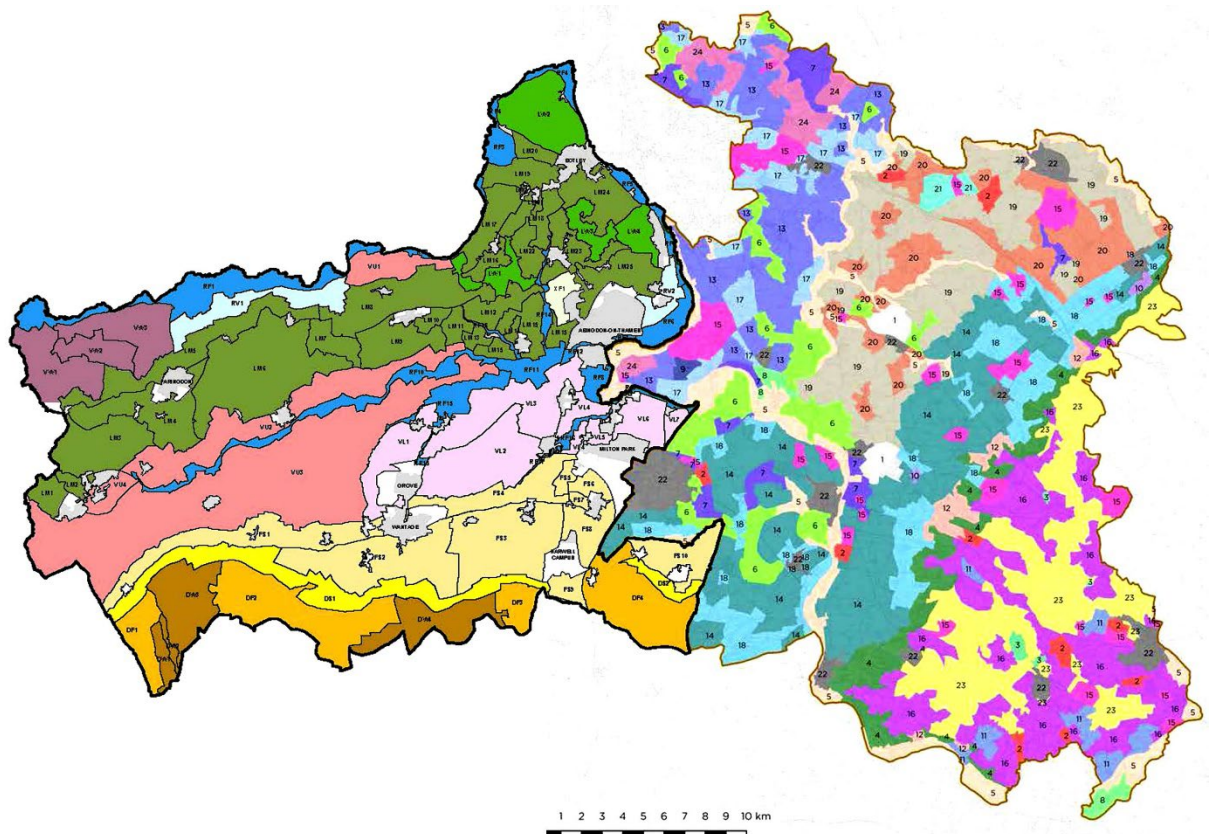
understanding landscape character and value. It uses various indicators categorised as positive or negative to gauge tranquillity without seemingly including external data from beyond the administrative boundaries.

2. The methodology specifies that a 6 km distance should be used to model visibility limits. However, there is no indication that data was considered beyond the boundaries of the Districts.
3. Some significant, large electricity pylons and overhead power lines have not been included in the mapping of negative features.
4. These oversights could lead to significant discrepancies in the results, as it fails to account for some significant negative features and may not account for tranquillity indicators outside the Districts that could be perceived from the edges of the Districts.

5. Landscape Character Assessment for South Oxfordshire and Vale of White Horse District Councils Sep 2024 (LCA'24)

- 5.1. The LCA'24 supersedes the 2017 LCAs for both South Oxfordshire (SOLCA'17) and Vale of White Horse District (VWHLCA'17) Councils.
- 5.2. SOLCA'17 identified 11 large scale LCAs and 24 LCTs. The number of individual District level LCAs was over 250.
- 5.3. VWHLCA'17 did not classify large scale LCAs. It did identify 12 LCTs. The number of individual District level LCAs was 83.
- 5.4. The total number of LCTs for both Districts in 2017 was 36. The total number of District level LCAs for both Districts in 2017 was over 330.

Fig 2: Distribution of LCAs for both Districts from 2017 Assessments



5.5. The LCA'24 identifies a total of 14 LCTs and 44 District level LCAs for the two Districts.

Fig 3: Distribution and number of LCAs from 2024 Assessment

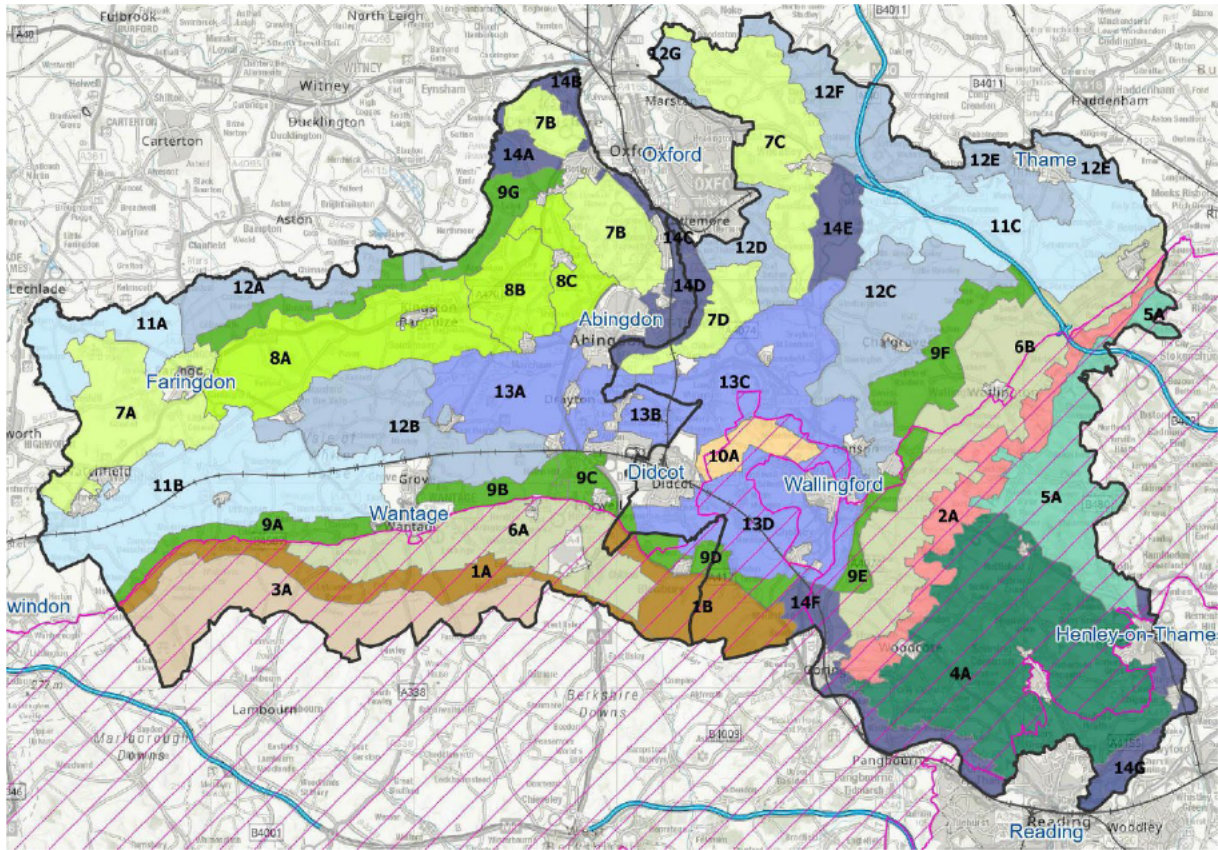


Table 1: Comparison between results of 2017 and 2024 Landscape Character Assessments

	2017 Landscape Character Assessments			2024 Landscape Character Assessments
	Vale of White Horse	South Oxford	Combined	Combined
Landscape Character Types	12	24	36	14
District Landscape Character Areas	83	250+	333+	44

- 5.15. LCA'24 amalgamates various LCTs from the 2017 assessments into larger, single LCTs and LCAs. Para 2.4 explains that the existing 2017 LCAs, as well as the earlier 1998 assessments informed a reclassification. No explanation is given as to why the previous finer grain level of assessment was replaced with a more generalised level of assessment.
- 5.16. SOLCA'17 together with VWHLCA'17 and my own observations, demonstrate that the landscape within the two districts can be (and has been) perceived as larger number of smaller landscape units, each with their own unique identity, than those identified within LCA'24.
- 5.17. LCA'24 has the effect of combining and watering down the specific unique characteristics of the finer grain LCAs, identified in the 2017 assessments, by combining them and applying them to larger areas. Examples of this are given below.

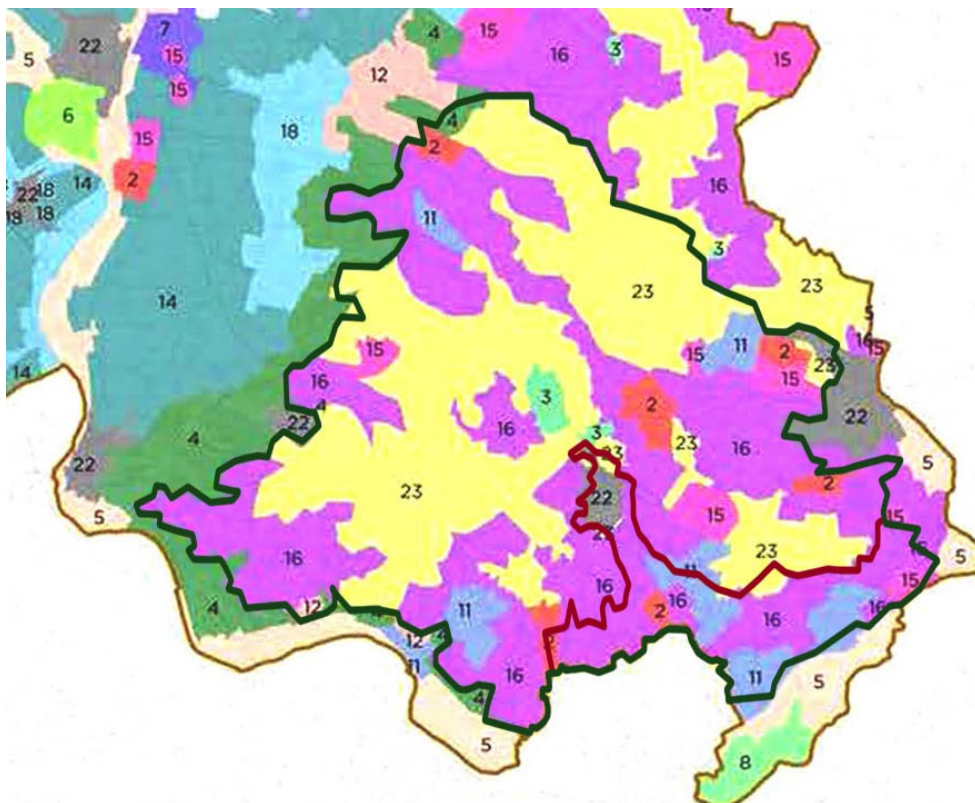
- 5.18. Page 17 of LCA'24 methodology describes how a bullet point list is provided for valued qualities. ALCA'18 page 17 makes it clear that Landscape character assessment is a neutral baseline and should not include judgements regarding landscape value.

Examples of issues with the LCA'24 LCTs

EXAMPLE 1: LCA'24; LCT4 WOODED CHALK PLATEAU AND VALLEYS

- 5.19. A large proportion of LCT4 is within the Chilterns National Landscape (CNL) (areas north of the red line in fig 4 below).
- 5.20. It broadly correlates with 'LCA 10: Chilterns Plateau with valleys' from SOLCA'17 which was sub-divided into over 35 individual LCTs, identified as having '*their own particular identity*' (see fig 4 below).

Fig 4: Extent of LCA'24 LCA4: Wooded Chalk Plateau and Valleys (dark green outline), overlain on LCA'17 mapping.



- 5.21. At a national level, parts of this landscape have been designated as CNL (areas north of the red line on fig 4) with other parts assessed as not meeting the criteria for national designation (areas south of the red line on fig 4). This suggests that at a national level the area is judged to have differing characteristics. I would expect this difference would be carried forward to the district level. No explanation is given as to why differences at national level are not accounted for at local level.
- 5.22. I consider the detailed description of LCA'24; LCT4 Wooded Chalk Plateau and Valleys to be contradictory. Page 4

bullet 1 describes it as:

'A heavily wooded landscape, with extensive areas of Ancient Woodland,'

5.23. This aligns with its title, but is contradicted in bullet 4 and 5 on the same page that describe it as:

Predominantly arable, with some pasture fields, especially close to settlements. Fields are contained within a strong structure of woods, species-rich hedgerows and trees, ... Pockets of open farmlands around Caversham and Nuffield have a weaker landscape structure, where the gentler gradients have encouraged intensive arable cover.

A number of golf courses, ...are found across the area.

5.24. I consider that the reference to the heavily wooded landscape better fits the area within the CNL than the area south of the CNL.

5.25. Page 10, bullet 5 of the detailed LCA'24 description for LCT4 goes on to describe different visual characteristics within the area:

Contrast between the enclosed, intimate and small-scale character of the dry valleys, and the more open broader plateau landscape above.

5.26. I consider that the above descriptions identify noted differences in landscape character across what is supposed to be 'distinct types of landscape that are relatively homogeneous in character' with 'their own particular identity' (ALCA'18, page 45)

5.27. Page 10, bullet 6 of the detailed LCA'24 description for LCT4 describes describes the tranquillity of LCT4 as 32% in Zone 1 ('areas of high tranquillity') and 65% in Zone 2 ('areas of some tranquillity') cross referencing to the findings of the TqA'24. I consider this to be an overestimate of tranquillity for areas outside the National Landscape.

5.28. The TqA'24 of the detailed LCA'24 description for LCT4, fails to account for the electricity pylons that run north of Caversham (see photographs 1, 2 & 3 in section 4 above) and are described in bullet 11 on page 10 of the detailed LCA'24 description for LCT4. Nore, does it appear to recognise the areas of modern housing (and tall water tower) at Emmer Green that are visible from areas north of Caversham that it describes as:

'detract(ing) from the traditional, rural character prevalent across most of the landscape.'

5.29. The plan on page 43 of TqA'24 shows the route of overhead power lines but omits power lines and their pylons of less than 400kv. As shown in photographs 1, 2 & 3 above, I consider that 132kv and 33kv electricity lines can be readily perceived 'large non-natural infrastructure elements.

5.30. Detracting characteristics described in LCT4 include:

- Occasional views to the urban edges of Reading and Caversham (page 5).
- Areas of pasture that have been converted to horse grazing, with associated fencing and horse tape

(page 9).

- Farmlands around Caversham and Nuffield that have a weaker landscape structure, where the gentler gradients have encouraged intensive arable cover (page 9).
- Road noise from the busy A4074, A4155 and A4130 which cross the area (page 10).
- Localised effects of suburban land uses on the edges of Caversham and Henley-on-Thames, including golf clubs and educational facilities (page 10).
- Electricity pylons north of Caversham that are locally intrusive in views (page 10).
- Small areas of modern housing within older villages also detract from the traditional, rural character prevalent across most of the landscape (page 10)
- Agricultural intensification, diversification and farm amalgamation that has led to loss of hedgerows, trees and woodland (Page 14)

Valued qualities

- 5.31. Page 11 lists valued qualities. ALCA'18 is clear that Landscape character assessment should not include judgements regarding landscape value.
- 5.32. Bullet 2 on page 11 and the map on page 12 highlight the CDLLD. This is a reference to landscape value and should be excluded from the LCT description.
- 5.33. Bullet 8 on page 11 notes that:

'Relative tranquillity and relatively dark skies are special qualities of the Chilterns National Landscape.'

- 5.34. This suggests that it recognises that relative tranquillity and relatively dark skies are not present to the same degree in those parts of the LCT that are not within the Chilterns National Landscape.
- 5.35. Many of these valued qualities occur within the CNL but are not characteristic of the areas away from the CNL. Without a distinction between the CNL and areas not within the CNL, the valued characteristics are applied to geographic areas that do not have such valued characteristics.
- 5.36. The table below lists some of the evidence of characteristics/factors that are considered by LCA'24 and TGN'21 to add value to a landscape. Defra Magic Map has been used to identify examples of these valued characteristics in both the areas of LCT 4 which lie within the CNL, and those parts which lie to the south. My own judgements on the frequency of the valued attributes, using a scale of high-low, are included in the table with justification provided in the notes.

Table 2: Relative extent of (some) valued characteristics/factors in LCT4

Characteristic / factor	Present in LCT4 CNL area	Present in LCT4 area south of CNL	Notes
Natural heritage			
National nature reserves	None	None	
Local Nature Reserves	Medium	None	2 in CNL
SSSIs	Medium high	None	7 within CNL
Special areas of conservation	Low	None	1 at Hartslock Wood in CNL
Priority Habitat Grasslands	Medium	Low	Relatively more and greater size and variety in CNL area
Priority Habitat meadows	Low	None	2 in CNL
Priority Habitat Heathland	None	None	
Priority Ponds	Medium	None	8 surveyed priority ponds in CNL
Chalk rivers	None	None	
Ancient woodland	High	Low	
Deciduous woodland	High	Medium	
Wood pasture	Medium high	None	
Cultural heritage			
Scheduled monuments	High	None	Approx 8 in CNL
Listed buildings	Medium	Medium	Relatively uniform numbers across the region
Registered parks and gardens	Low	None	1 at Greys Green in CNL
Parkland	Medium high	None	
Conservation areas	Medium	None	
Registered common land	Medium	Low	There is 1 very small area on the edge of Shiplake
Recreational			
National trail	None	None	The Thames National Trail is outside and to the south of LCT4
Long distance route	High	Medium	Short sections of the route cross areas outside the CNL but the majority is within the CNL
PROW	High	Med-High	Relatively more within the CNL
National cycle network	High	Med-High	Relatively greater length within the CNL
Village greens	Medium	Low	6 within the CNL, 1 to the south, 1 Millenium green on the border at Sonning Common
Country Parks	Low	None	1 at Mapledurham on CNL
Open access land;	Medium	None	Only within CNL, relatively high compared to areas of England outside national designations

- 5.37. I consider that the above table demonstrates that the areas of LCT4 that are outside the CNL are demonstrably different in terms of the extent of valued qualities compared to areas within the CNL.

Landscape strategy and guidelines

- 5.38. Page 16 and 17 of the detailed LCT4 description presents landscape strategies and guidelines. The CNL is protected and valued at a national level, so it should be expected that within that area, the guidelines are more restrictive. Guidelines for areas within the CNL already exist in the CNL management plan. The guidelines within LCT4 confuse what should take precedence. There is no separation between guidelines for the areas within the CNL and those areas outside the CNL.
- 5.39. Bullet 3 on page 17 states:

'There is very limited scope for development that would not detract from the valued qualities of the Chiltern Wooded Chalk Plateau and Valleys. Avoid the adverse impact of any new development on local character and on the distinctive scattered settlement pattern.'

5.40. If most of the valued qualities of the Chiltern Wooded Chalk Plateau and Valleys relate to areas within the CNL, this statement should be restricted to those areas.

5.41. I consider this to be a flaw in LCA'24, restricting development in areas that do not have the same sensitivities as the CNL.

EXAMPLE 2: LCA 14G: CAVERSHAM TO HENLEY THAMES RIVER VALLEY

5.42. This broadly correlates with 'LCA 11: Thames Valley and Fringes' from SOLCA'17 which was sub-divided into over 10 individual LCTs, identified as having 'their own particular identity'.

5.43. The plan on page 111 of LCA 14: River Valleys detailed descriptions shows the boundaries of this LCA over OS base mapping. This shows that the LCA extends along the River and its width is constricted in three locations by the settlements of Henley on Thames, Lower Shiplake and Shiplake, together with the administrative boundary. This narrowing of the width of the LCA divides it into four '*individual geographic areas*' (page 45 of ALCA'18), suggesting that each geographic area should be a separate LCT.

5.44. The plan also shows the LCT includes the valley bottom and its associated wetland landscape, as well as the (sometimes steep) well drained, valley sides. The valley sides in the north of the LCT have an east facing aspect, whilst those in the south of the LCT have a more southern facing aspect. I consider the differences in landscape character between the valley floor and the valley sides to be significant (on the above criteria alone). I consider this demonstrates that this LCT is not '*relatively homogenous in character*' (page 45 of ALCA'18).

5.45. Page 109 lists valued qualities, the last being:

'The value of the landscape is demonstrated by its inclusion within the Henley to Sonning Eye Thames Floodplain Local Landscape Designation.'

5.46. The criteria for identifying LLDs includes the findings of the LCA, whilst the LCA states that value is demonstrated by inclusion in the LLDs. I consider this to be a circular reference that should be removed from the LCA.

CONCLUSIONS REGARDING EXAMPLES 1 AND 2

5.47. I consider that these noted differences in character demonstrate that these large LCTs / LCAs do not have a '*broadly consistent, homogenous character*', nor are they single '*unique geographic area(s) with a consistent character and identity*', as set out in para 5.1 of LCA'24.

5.48. This range of differing characteristics is recognised in the earlier Landscape Character Assessments SOLCA'17 and the SOLCA'03, both of which divided the areas into smaller LCAs (see Fig 2 above). I believe that this demonstrates that the landscape in these parts of the Districts can be (and was) perceived at a smaller scale (or finer grain of smaller landscape units) which would more appropriately and robustly reflect their own unique identity, than the areas identified within LCA'24. I consider this is a scale at which a landscape is perceived that better fits the description in TGN'21 para 2.4.5, bullet 6.

5.49. I consider that this demonstrates that these LCTs in LCA'24 should be divided into smaller LCAs, like the previous

Landscape Character Assessments. It follows that the same could apply to the rest of the LCTs within LCA'24.

SUMMARY

1. LCA'24 replaces the 2017 assessments, which identified over 330 District level LCAs and 36 Landscape Character Types (LCTs) combined for both districts.
2. The new assessment identifies 14 LCTs and 44 District level LCAs, consolidating previous classifications into larger, more generalized categories. This shift is seen as diminishing the unique characteristics of smaller landscape parcels recognised in earlier assessments.
3. I consider that the amalgamation of LCTs into broader categories has resulted in a loss of specificity and detail regarding the unique identities of the landscapes. This is exemplified by LCT4 (Wooded Chalk Plateau and Valleys), which I do not believe accurately reflects the distinct characteristics of its components, particularly in relation to the Chilterns National Landscape (CNL).
4. There are contradictions in the descriptions of example LCT4, while it is characterised as heavily wooded, it also includes large areas of intensive agriculture, undermining the clarity of its identity.
5. The assessment's list of valued qualities fails to differentiate between areas within the CNL and those outside it, leading to an inaccurate application of characteristics. Various detracting features, such as urban edges and infrastructure, are also noted as impacting the landscape's value.
6. The guidelines presented in LCA'24 lack differentiation between areas within and outside the CNL, potentially restricting development in areas that do not share the same sensitivities.
7. Two examples illustrate the issues with the broader classifications. Both examples demonstrate significant differences in landscape character that suggest the need for more localised assessments.
8. I conclude that the LCA'24 does not adequately reflect the diverse and unique landscape characteristics recognised in earlier assessments. Overall, I consider that a more nuanced approach to landscape assessment is carried out that recognises the unique characteristics of smaller landscape units.

6. Local Landscape Designation Review of South Oxfordshire and Vale of White Horse (LLDR'24)

- 6.1. LLDR'24, Para 2.35 explains that nine candidate LLDs were identified. It is not practical for this peer review to examine in detail each candidate LLD. Instead, the Chilterns Dipslope LLD is used as one example and examined in more detail in the next section as a landscape area that I am familiar with from previous work.

Methodology

- 6.2. Chapter 2 describes the methodology. Para 2.5 refers to GDLLA'20 and para 2.6 refers to TGN'21. Para 2.7 goes on to state:

'The methodology for this study draws from the above guidance as well as LUC's experience in undertaking designation reviews elsewhere in the UK.'

- 6.3. It doesn't expand on this by clearly and transparently explaining where, how and why LUC's experience may differ from the above guidance.

GEOGRAPHIC SCOPE, SIZE AND COHERENCE

- 6.4. Para 2.19 states that the study excludes areas that fall within the nationally designated landscapes. The scoping exercise considers all LCAs. Those that are located wholly within a National Landscape are excluded, however (using LCA 4A: Chilterns Fringe Wooded Chalk Plateau and Valleys as an example) those that are partially within a National Landscape seem to have criteria from the National Landscape included in the Summary of reasoning (see the detailed review of LCA 4A below) even though the boundary of the candidate LLD excludes the area of the CNL.
- 6.5. Para 2.20 explains that LLDR'24 uses the framework of LCA'24. Para 2.24 explains that all LCAs outside the AONBs were assessed against the criteria.
- 6.6. Para 2.21 states that LLD areas should form a coherent recognisable area of consistent character at the district level. As explained above, I do not consider that the LCAs have a '*broadly consistent, homogenous character*', nor are they single '*unique geographic area(s) with a consistent character and identity*', as set out in para 5.1 of LCA'24 and page 44 of ALCA'18. I consider that such variable characterisation undermines their use as a starting point for assessment.
- 6.7. As I explain above, I consider that landscapes within the study area are perceived at a smaller scale than the LCTs and that it is this smaller scale of landscape unit that better fits the description in TGN'21 para 2.4.5, bullet 6.
- 6.8. This is recognised in para 2.5.4 of GDLLA'20:

'The LCT may not be detailed enough to inform an LLA designation process'

- 6.9. It is also recognised in the table on page 26 of GDLLA'20:

‘the designation process identifies more discrete areas of landscape (than those identified in a LCA) and that these more discrete areas are considered to be of higher merit than the larger areas identified in the LCA.

CRITERIA DEVELOPMENT

- 6.10. When considering the range of factors that can be considered when identifying landscape value, LLDR’24 para 2.23 explains that:

‘The evaluation criteria are drawn from the relevant guidance, including the LI Technical Guidance and SNH guidance. They also draw on criteria developed by LUC in previous local designation studies ...’

- 6.11. The most up-to-date national guidance is the LI Technical Guidance (TGN’21) referred to. This supersedes the SNH guidance and is considered by planning inspectors to be the appropriate guidance. It is useful, as it presents the range of factors together with; a clear definition, examples of indicators and examples of evidence of each. The factors used in LLDR’24 are slightly different from TGN’21 and do not present as much detail for potential indicators and evidence. I consider this to be a weakness in the LLDR’24. A clearer, more transparent methodology would have used Table 1 of TGN1 as its basis.

DESK BASED SCOPING

- 6.12. Para 2.24 of LLDR’24 explains that a three-point RAG rating system was used: *‘green – clearly meets the criterion, amber - partially meets the criterion, red – does not meet the criterion’*. This does not conform to the guidance in GDLLA’20 para 2.4.9 that recommends a ranking of *‘high, medium and low’*. I consider the RAG system skews the results. ‘Partially’ in the RAG rating would equate to any occurrence, no matter how low or small it is. This would have the effect of landscapes scoring higher with the RAG rating than the recommended high, medium, low’ ranking.
- 6.13. Using large LCTs as the basis for the scoping will also skew results. For example, a positive criterion may exist in only a single small location with the LCT and may not be perceivable from other parts of the LCT. However, all parts of the LCT benefit from the scoring of the single small location.
- 6.14. The scoping focusses on positive attributes. Whilst there is mention of detracting characteristics (for example in LCA 4A: *‘proximity of suburban influences’* and *‘electricity pylons intrusive in views’*) there is no explanation of how these are accounted for in the ranking/rating system.

FULL EVALUATION OF CANDIDATE LLDS

- 6.15. GDLLA’20, para 2.7.11 is clear that a Statement of Importance should be provided for each LLD and this should include:
- *The reasons for designation and the criteria it met.’*
 - *A clear description of the landscape and why it is designated.*
 - *What is valued and why.*
- 6.16. I do not consider that full evaluation of candidate LLDs contain the above information.

- 6.17. A plan is included showing the boundaries of the LLDs. It would be helpful to show any specific features that evidence value to demonstrate in a clear and transparent way the extent the features contribute to the overall landscape character and value. Unlike the plans included in the detailed descriptions of the LCAs, there is no mapping of any factors that would provide evidence of value.
- 6.18. A 'Statement of Significance' is provided. Whilst this gives a broad description of each LLD it does not clearly state *'why it is designated'*. The range of factors / valued criteria are presented with bullets describing characteristics associated with each factor, but there is no judgement of how well the LLD meets each factor. It is not possible to see how well each *'criterion is met'*.
- 6.19. In order to clearly and transparently demonstrate that the LLD is *'out of the ordinary'* and has *'sufficient landscape qualities to elevate it above other more everyday landscapes'*. I would expect a 3 or 5 point rating system from 'High - Low' for each of the criteria. I would expect it to take account of detracting factors such as road noise, field amalgamation, visible suburban areas and visible large scale man-made structures such as electricity pylons or solar farms. I would expect areas where such detracting factors are highly perceivable to be judged lower.
- 6.20. When assessing value close to a national designation such as the CNL, I consider the following points from TGN'21 to be relevant:
- 'what may be defined as reaching the 'valued landscape' threshold/criteria in one part of the Country may be considered to be an 'everyday landscape' in another.'*
- The identification of landscape value needs to be applied proportionately ensuring that identification of 'valued landscape' is not overused.'*
- 6.21. The above guidance from TGN'21 indicates that where a landscape unit is in a part of the Country broadly covered by National Landscapes, the level at which a value is more than everyday landscape is raised.
- 6.22. TGN'21 also indicates that where a large proportion of a study area is designated at a national level, care should be taken to ensure 'valued landscape' is not overused.

SUMMARY

1. LLDR'24 is based on existing guidance and LUC's own experience, although specifics of how LUC's experience differs are not fully explained.
2. The study excludes areas within nationally designated landscapes. However, some partially included areas incorporate criteria from national landscapes. I consider that a review of smaller-scale units would be more accurate.
3. LLDR'24 draws from the latest guidance (TGN'21), but it lacks the detailed indicators and evidence examples provided by TGN'21, making the methodology less transparent.
4. LLDR'24 uses a three-point RAG (Red-Amber-Green) rating system, which is less nuanced than the recommended "high, medium, low" system. The scoping also emphasises positive attributes without fully accounting for detracting characteristics.
5. I consider that LLDR'24 fails to provide some essential information recommended by national guidance, such as clear reasons for designation and specific evidence of landscape value. The Statement of Significance provides only broad descriptions without detailed assessments of how well each criterion is

met.

6. Where a landscape unit is close to a national designation, I consider a more selective application of "valued landscape" should be used to ensure these designations are reserved for landscapes are genuinely '*Out of the ordinary*'.

7. The Chilterns Dipslope LLD (CD LLD) example

Extent of CD LLD

- 7.1. Fig 5 shows the extent of CD LLD over a Google earth image with a reference date of 4/2020. The boundaries of the adjacent CNL are also shown. The 2020 image has been chosen as it more easily distinguishes between arable land (brown/cultivated) and grassland (green). Some areas of green may in fact be growing arable crops.
- 7.2. Figs 5 and 6 show the boundaries of CD LLD and the adjacent CNL over 1: 25,000 OS mapping. Comprehensive mapping of valued characteristics/ factors and detracting factors are presented.

DESK-BASED SCOPING EXERCISE

- 7.3. As described on page 18 of LLDR'24, the CD LLD is based on a desk-based scoping exercise carried out for LCA 4A Chilterns Fringe Chalk Plateau and Valleys.
- 7.4. The statement in the Results of the Desk-Based Scoping Exercise (LLDR'24 Appendix A, page A-3) describes the landscape as follows:

'There is good coverage of woodland, with large amounts of beech woodland common, much of which is ancient woodland. A loose mosaic of mainly intensive arable fields and woodland, comparatively open but with some hedgerows.'

- 7.5. Fig 5 shows that the area outside the Chilterns National landscape (CNL) is predominantly arable. The above description focuses on the woodland, suggesting that it is mainly woodland. I do not consider this a fair description of the area outside the CNL, it seems to me to be a description of the landscape within the CNL.
- 7.6. The statement in the Results of the Desk-Based Scoping Exercise goes on to refer to '*commons and heaths*' and '*small parkland estates*'. There are no DEFRA recognised heaths within the area. There is only 1 small common inside a highway junction island on the edge of Shiplake. Other than the former parkland at Shiplake College that has been converted to sports fields, I can find no evidence of parkland estates outside the CNL. The description of LCA 4A (page 4 and 10) refers to parklands at Checkendon Court, Greys Court and smaller parkland landscapes on the edges of Henley-on-Thames. All of these locations are within the CNL, outside CD LLD.
- 7.7. The wording in the Results of the Desk-Based Scoping Exercise suggest to me that potentially valued characteristics from within the CNL have influenced the scoping that should have excluded characteristics that are only found within the CNL.

Statement of significance

- 7.8. Like the statement in the Results of the Desk-Based Scoping Exercise the summary of special landscape qualities focuses on woodland and ancient woodland.

Fig 4: Extent of CD LLD over aerial image



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KEY:

-  Boundary of CD LLD
-  Boundary of Chilterns National Landscape

Date: 04-11-24
Drawn by: DA/ DL
Checker: DL
Rev by:
Rev checker:
QM Status: Checked
Product Status: Issue

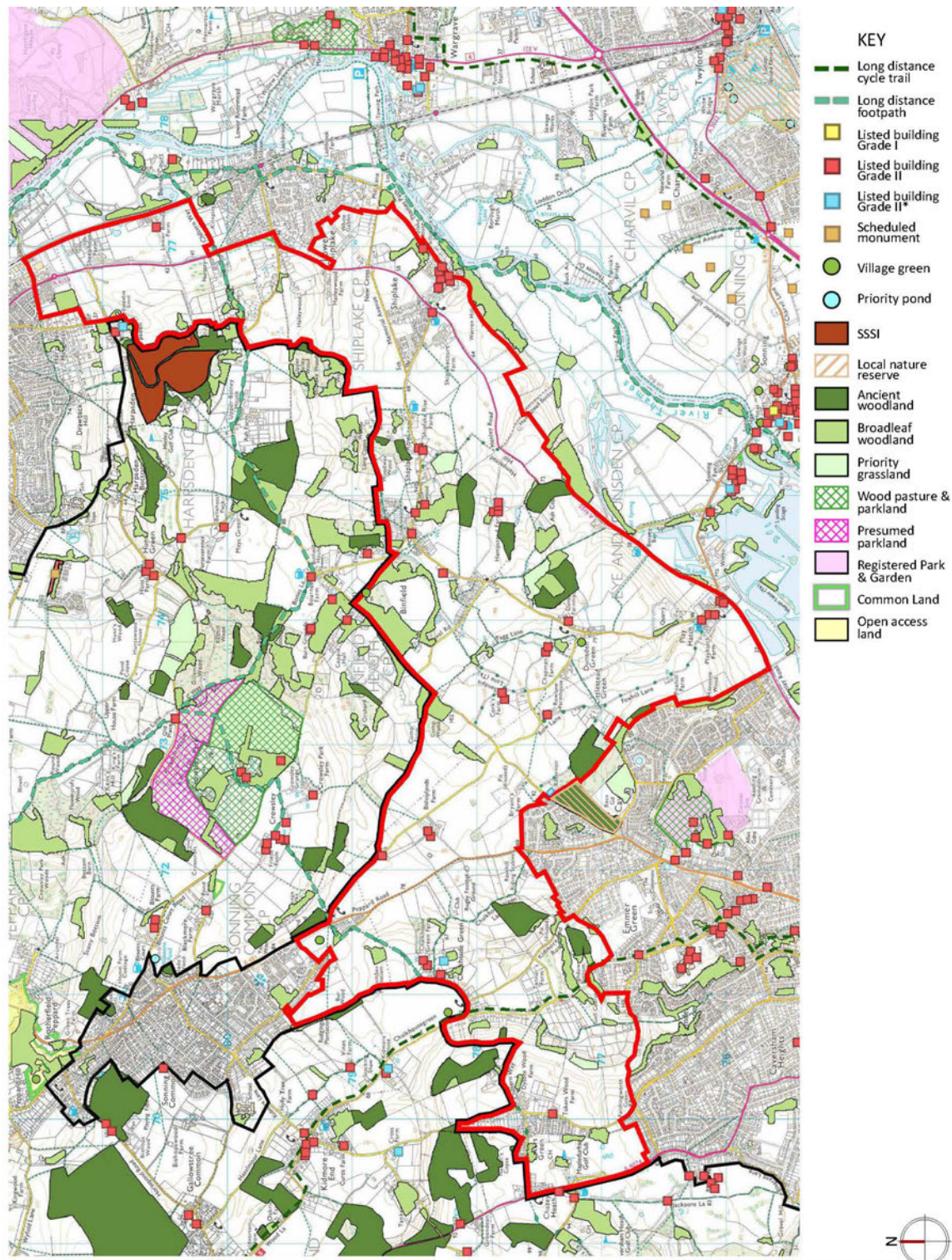
Gladman

**Peer review of
LLDR'24****Fig 4: CD LLD Aerial image**

Drwg No: 995C-01

Scale: NTS@ A4

Fig 5: Extent of CD LLD showing positive features



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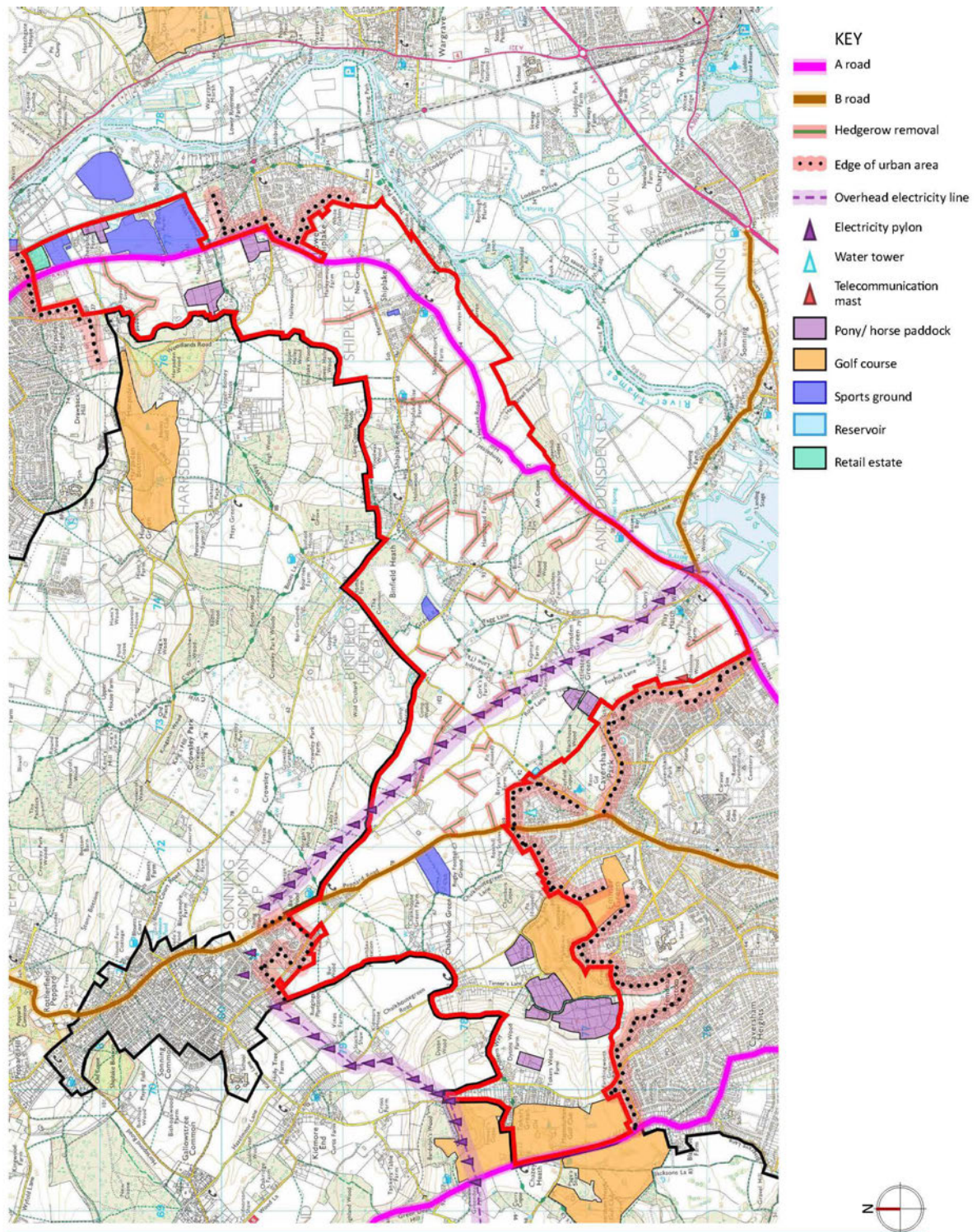
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**Fig 5: CD LLD Positive
 features**

Drwg No: 995C-02

Scale: NTS@ A4

Fig 5: Extent of CD LLD showing detracting features



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**Fig 6: CD LLD Detracting
features**

Drwg No: 995C-03

Scale: NTS@ A4

VALUED CHARACTERISTICS/ SPECIAL LANDSCAPE QUALITIES

- 7.9. GDLLA'20 Para 2.7.11 and table 3 on page 34 recommends good practice in writing a Statement of Importance for each identified LLA. The Statement of Importance should include (amongst other things):
- *'The reasons for designation and the criteria it met.*
 - *A clear description of the landscape and why it is designated.*
 - *What is valued and why.*
- 7.10. The Statement of significance (page 51) summarises the 'special landscape qualities'. It goes on to describe in more detail what factors / criteria are within the LLD. It fails to explain to what degree the factors are met and does not clearly explain what is valued and why.
- 7.11. The table below uses information from DEFRA Magic map to identify examples of valued characteristics/factors, including those listed in LCA'24 and /or TGN'21 and provides my own judgement to the extent that they are present in CD LLD. I consider that this clearly demonstrates that the CD LLD has few indicators of value that can be objectively included using information from DEFRA.

Table 3: Relative extent of (some) valued characteristics/factors in CD LLD

Characteristic / factor	Present in LCT4 area south of CNL	Notes
Natural heritage		
National nature reserves	None	
Local Nature Reserves	None	2 in CNL
SSSIs	None	7 within CNL
Special areas of conservation	None	1 at Hartslock Wood in CNL
Priority Habitat Grasslands	Low	Relatively more and greater size and variety in CNL area
Priority Habitat meadows	None	2 in CNL
Priority Habitat Heathland	None	
Priority Ponds	None	8 surveyed priority ponds in CNL
Chalk rivers	None	
Ancient woodland	Low	
Deciduous woodland	Medium	
Wood pasture	None	
Cultural heritage		
Scheduled monuments	None	Approx 8 in CNL
Listed buildings	Medium	Relatively uniform numbers across the region
Registered parks and gardens	None	1 at Greys Green in CNL
Parkland	None	
Conservation areas	None	
Registered common land	Low	There is 1 very small area on the edge of Shiplake
Recreational		
National trail	None	The Thames National Trail is outside and to the south of LCT4
Long distance route	Medium	Short sections of the route cross areas outside the CNL but the majority is within the CNL
PROW	Med-High	Relatively more within the CNL
National cycle network	Med-High	Relatively greater length within the CNL
Village greens	Low	6 within the CNL, 1 to the south, 1 Millenium green on the border at Sonning Common
Country Parks	None	1 at Mapledurham on CNL
Open access land;	None	Only within CNL, relatively high compared to areas of England outside national designations

FULL EVALUATION

Local distinctiveness and sense of place

- 7.12. Page 53 of the LLDR'24 includes a description of local distinctiveness and sense of place. Bullet 1 states DC LLD has:

'A continuation in character with the Chilterns National Landscape.

- 7.13. Table 2 in section 5 (above) and figs 5 & 6 (above) demonstrate that the area of CD LLD south of CNL has far fewer valued characteristics than the CNL and relatively more detracting factors.
- 7.14. The special qualities of the CNL are described in Section 2.0 of the Chilterns Management Plan 2019-2024 (CMP). Table 4 (below) lists the special qualities of the CNL from pages 10 and 11 of the CMP and presents my own judgement regarding the extent to which they are, or are not present in the LLD Chilterns Dipslope, on a scale of: None; Moderate-low; Moderate; Moderate-high; High.

Table 4: Degree to which AONB special qualities are present in the LLD Chilterns Dipslope.

Characteristics	Presence	Notes
<i>PANORAMIC VIEWS from and across the escarpment interwoven with intimate dipslope valleys and rolling fields.</i>	None	The landscape within the LLD are not part of the chalk escarpment.
<i>Significant ancient hedgerows, hedgerow and field trees, orchards and parkland weaving across farmland.</i>	Moderate-low	There are some ancient tracks and hedges within the LLD. Historic maps show that arable farming has led to hedgerow loss. There are no intact parklands within the LLD.
<i>Relative TRANQUILLITY and peace on the doorstep of TEN MILLION PEOPLE, one of the most accessible protected landscapes in Europe; relatively dark skies, of great value to human and wildlife health; unspoilt countryside, secret corners and a surprising sense of remoteness.</i>	Moderate-low	The urban edge, main roads (A4155), pylons, telecommunication masts and overhead power lines mean that the LLD has less relative tranquillity and dark skies than the more remote CNL. Amalgamation of fields, hedgerow removal, quarry works and utilities means there has been a degradation of countryside within the LLD.
<i>Nationally important concentrations of CHALK GRASSLAND, extremely DIVERSE IN FLORA AND FAUNA, and home to some SCARCE AND THREATENED SPECIES. Once extensive, the chalk grassland now only covers 1% of the AONB mostly in small fragments.</i>	Low	There are no sites with national wildlife designations (such as SSSI) within the LLD. There are no records of chalk grassland or heathland on Magic map.
<i>One of the most WOODED LANDSCAPES IN ENGLAND, with 23% WOODLAND COVER concentrated in the central and southern areas; 56% OF THE WOODLAND is Ancient, a particularly rich, distinctive and prominent feature, including the Chilterns Beech Wood Special Area of Conservation; significant box, juniper and beech yew woods; many veteran trees, relict wood pasture.</i>	Low	There is relatively little woodland within the LLD compared to the CNL. The landscape comprises a mix of open arable farmland and some smaller woodlands. The Chilterns Beech Wood Special Area of Conservation is not present in the LLD.
<i>NINE PRECIOUS CHALK STREAMS, a globally scarce habitat and home to some of the UK's most endangered species; numerous chalk springs occur along the base of the escarpment.</i>	Low	Chalk streams are not a feature of the LLD. Some springs within the dipslopes.
<i>An extensive and diverse ARCHAEOLOGICAL LANDSCAPE, including ancient parish boundaries, medieval field patterns and IRON AGE HILLFORTS; extensive remnants of woodland heritage including sawpits, charcoal hearths and wood banks.</i>	Low	There are few noted archaeology features and no scheduled monuments. A mix of medieval enclosure and amalgamated fields.
<i>A DRAMATIC CHALK ESCARPMENT, a globally rare landscape type which gives rise to rare ecology and distinctive cultural heritage.</i>	None	Not a feature of the LLD.
<i>OVER 2000ha OF COMMON LAND, heaths and greens, RICH IN WILDLIFE and cultural heritage; 3700ha OF OPEN ACCESS LAND.</i>	Moderate-low	Some village greens but no heaths or open access land.

<i>A dense network of 2000km of rights of way; two NATIONAL TRAILS, the Ridgeway and Thames Path; notable regional routes such as the CHILTERN WAY and the CHILTERN CYCLEWAY.</i>	Moderate-low	A number of PROW and 'other routes with public access', but routes are markedly less abundant than within the of the CNL.
<i>An INDUSTRIAL HERITAGE around wood-working, furniture making, chalk quarrying, brick making, and food production with windmills and watercress beds.</i>	Moderate-low	Some chalk pits and quarries but limited evidence of industrial heritage.
<i>DISTINCTIVE BUILDINGS made from local brick, flint and clay tiles; many ATTRACTIVE VILLAGES, popular places to live in and visit; many notable individual buildings and follies including STATELY HOMES, MONUMENTS and MAUSOLEUMS; a wealth of MEDIEVAL CHURCHES, many built from flint.</i>	Moderate-high	Attractive villages and hamlets. Some listed buildings of heritage value mixed with some small modern housing areas.
<i>Numerous ANCIENT ROUTEWAYS and SUNKEN LANE</i>	Moderate	Some ancient routeways and sunken lanes.

- 7.15. I consider that the above table clearly demonstrates that the candidate LLD does not possess the special qualities of the CNL to the same extent as the CNL.

Landscape quality

- 7.16. The description on page 53 acknowledges that the area has a number of detracting features, as shown on Fig 5.

Scenic and perceptual aspects

- 7.17. The description on page 53 states:

'variation between openness and enclosure when travelling through the area. Expansive views are possible In contrast, the combination of sunken lanes, the dry valley topography and woodland creates more enclosed views, with some sense of remoteness'

- 7.18. This demonstrates the area does not conform to recognised best practice (GDLLA'20) as it is not:

'perceived as an area 'of distinct, recognisable, and consistent character ... relatively homogeneous in character ... but have their own particular identity'

- 7.19. More detracting features are listed on page 54.

Natural and cultural qualities

- 7.20. Clayfield Copse is listed as a Local Nature Reserve but is outside the boundary. Binfield Heath is mentioned but acknowledged to be no longer a heath. It is recognised that the most common field pattern is amalgamated fields. It is also acknowledged that the former parkland at Shiplake Collage is now converted to sports facilities.

- 7.21. Overall, these descriptions suggest that area has low value in terms of natural and cultural qualities.

Recreation Value

- 7.22. Page 55 acknowledges that only *'a small section of the Chilterns Way crosses the area.'* It goes on to describe golf courses which cannot be more than ordinary landscapes.

Associations

- 7.23. Page 55 lists only 2 associations, neither of which relate specifically to landscape (as explained in Table 5 below).

LANDSCAPE VALUE

- 7.24. I have carried out my own assessment of overall value for the candidate LLD Chilterns Dipslope based on desk top study of OS mapping (historic and current) and aerial imagery, Magic map data, information from the 1998, 2017 and 2024 LCA and earlier visits to the area. This assessment is presented below in table 5 and uses the factors and indicators of value from TGN'21. It covers the whole area of the LLD.

Table 5: Landscape value of candidate LLD Chilterns Dipslope

Criteria	Observations/comments regarding indicators of value	Value
Natural heritage	A predominantly arable landscape interspersed with woodlands, hedgerows and pasture. There are some areas of ancient woodland, and three Local Wildlife Sites. There are mature roadside hedges and some hedges creating boundaries between fields. The gently undulating topography is not particularly distinctive or unusual. There are no SSSIs, Local Nature Reserves, wood pasture and parkland or heathland (MagicMap). Golf courses, sports fields and horse paddocks detract from the wildlife value of some 'pasture' areas. The area is a mix of ordinary arable land together with areas of valued woodland, but offset by the presence of land managed for sport and low value horse grazing. The area has relatively few areas identified (on Magicmap) as valued for ecology.	Medium
Cultural heritage	There are no historic landmark structures or designated landscape elements, historic parks or gardens, scheduled monuments. One small area of parkland has been turned to sports fields. There are listed buildings throughout the area. Sunken lanes and historic villages and farmsteads provide a dimension of time depth. The area has few heritage assets other than listed buildings historic villages and sunken lanes that are not uncommon in the wider areas.	Medium
Landscape condition	Historic mapping and evidence from aerial imagery shows that parts of the area suffer from hedgerow removal and field amalgamation, although some historic fields remain. Detracting features include: pylons and overhead power lines, telecommunication masts, a tall water tower, a small covered reservoir, areas of horse grazing divided by horse tape, amenity landscapes such as golf courses and sports fields.	Medium-low
Associations	The description of LCT4 does not list any associations. The associations listed in the LLD area profile are Wilfrid Owen and the BBC. Whilst these are interesting historically, I do not consider they have any association with the landscape. Owen spent only two years in the area, prior to any of his known work being written or published. The content of his work is not based on landscape themes or content but rather with war and faith.	Low
Distinctiveness	This is an area of mixed character and distinctiveness. Open slopes of the Thames valley contrast with areas of semi-enclosed fields and woodland. The predominantly rolling arable landscape is not an uncommon landscape type nationally. Golf courses, sports fields and horse paddocks further reduce the distinctiveness of the area. The area is located between the distinctive landscape of the Thames valley and the distinctive landscape of the Chilterns National Landscape, but lacks the strong distinctive features of either of these. Compared to adjacent areas this has low distinctiveness.	Low
Recreational	The area is criss-crossed by PRoW, but not to an unusual extent. The Chilterns Way runs through parts of the northern area and the northern boundary, but is mostly within the adjacent CNL. The Thames Way runs through the adjacent LLD to the south. As a result, I consider that PRoW have relatively more value in the adjacent areas. There is no open access land. Parts of the area are visible from the CNL. There are some village greens with play areas. There are open sports fields and golf courses.	Medium

Criteria	Observations/comments regarding indicators of value	Value
Perceptual (Scenic)	The slopes of the Thames valley are distinctive and dramatic. Whilst this can be appreciated from lanes and PROW within the area, the sunken nature of lanes and mature hedges limit views of the landform. The historic villages and hamlets have many attractive buildings and combinations of buildings. Parts of the area can be seen from the edges of the AONB and vice versa (but this alone is not enough to count as valued landscape). There are some long views over the Thames valley, but these are generally towards urban areas. Large amalgamated, arable fields, together with the presence of masts and overhead power lines and visibility of adjacent urban / sub-urban areas detract from the scenic value.	Medium
Perceptual (Wildness and tranquillity)	There is no wild land. A rural landscape but visibility and noise of large adjacent settlements, roads, masts and overhead power lines limits the sense of remoteness and relative tranquillity. Closer to the CNL, relative tranquillity increases.	Medium
Functional	The rural land within the study area functions primarily as agricultural land and woodland. This is not an uncommon function nationally	Medium
Overall Judgement of landscape value:		Medium

7.25. Overall, I judge the LLD to be medium value. I consider this equates to ordinary landscape. It has no *'landscape qualities to elevate it above other more everyday landscapes.'*

7.26. I consider that it evident that the LLD is of highly variable value and has proportionally less woodland cover and more amalgamated fields of arable land than the CNL. The eastern part, (extending from A4074 western edge, north of Emmer Green and Caversham to the line of the 132kv electricity line and pylons [and extending somewhat east from these where they are visible]) is of lowest landscape value due to the combined effect of detracting features shown on Fig 5.

CONCLUSION

7.27. Whilst the candidate LLD Chilterns Dipslope may have pockets of higher value landscape within it (associated with the historic villages, hamlets and woodlands) when considered as a whole, the overall *'weight of evidence'* does not suggest that it is *'out of the ordinary'* for this part of the Country. I can see no evidence that it has *'sufficient landscape qualities to elevate it above other more everyday landscapes'*.

7.28. I consider it is similar to the Crown Road case in which the Inspector concluded:

'Its demonstrable physical attributes are not very different to many other fields and slopes ...in the locality generally including others crossed by public rights of way. It does not contribute to the wider landscape character any less or more than other similar fields around the settlement. Having regard to the advice in (TGN'21), ... the site does not deserve any higher level of protection that might be claimed under paragraph 174(a) of the NPPF.'

7.29. As such, I do not consider that this part of the LLDR'24 meets the criteria for valued landscape and it should not have a Local Landscape Designation.

7.30. Given the above, I consider that it is possible that other areas within LLDR'24 may not meet the criteria for valued landscape, and should not be identified as candidate LLDs.

- 7.31. I also consider the above assessment demonstrates the harm of considering such large areas for candidate designation. Having to account for ordinary landscapes and detracting features across the whole area, has the effect that smaller parcels of land, that on their own may have features of high value and not be impacted by detracting features, are overlooked.

SUMMARY

1. The Chilterns Dipslope Local Landscape Designation (LLD) is used as an example, evaluating its boundaries, characteristics, and compliance with designation criteria. Key findings are:
2. The scoping describes the landscape as having significant woodland coverage, but this seems more reflective of areas within the CNL than the Chilterns Dipslope area, which is predominantly arable. I consider there are inaccuracies with the description, particularly references to parkland estates and heathland that only exist within the CNL.
3. The Statement of Significance lacks clarity on why and to what degree special qualities or factors are valued. I consider a more transparent evaluation should be presented, using best practices to detail how the landscape meets designation / valued landscape criteria.
4. **Local Distinctiveness and Sense of Place:** Evidence indicates that the candidate LLD lacks many qualities found in the CNL and has fewer valued characteristics.
5. **Scenic, Natural, and Cultural Qualities:** Several detracting features, such as large amalgamated fields and infrastructure like high-voltage electricity lines, reduce the area's value.
6. **Recreational and Associational Value:** Recreational features like golf courses are considered ordinary, and cultural associations are minimal.
7. **Landscape Value Assessment:** Based on mapping, aerial imagery, and field study, I consider that the Chilterns Dipslope LLD has only medium value, representing an ordinary landscape without exceptional qualities. The eastern portion, in particular, is of low landscape value due to detracting features.
8. While the Chilterns Dipslope has pockets of higher-value landscapes, it lacks distinctive qualities that would elevate it above everyday landscapes. This aligns with the Crown Road case, which found no unique characteristics warranting higher protection. I consider that this area should not be designated as an LLD and a more selective, small-scale approach for other candidate LLDs in LLDR'24 is adopted to avoid including ordinary landscapes and detracting features.

8. Relationship to draft policies

Landscape policies

- 8.1. The Joint Local Plan, Pre-submission publication version; South Oxfordshire and Vale of White Horse District Councils Oct 2024 (JLP'24) has a number of draft policies that relate to landscape protection, conservation and enhancement.

DE1 HIGH QUALITY DESIGN.

- 8.2. This requires development to respond positively to the site and its surroundings and reinforces local identity or establishes a distinct identity and respond positively to the history of a site and its surroundings, and conserve and enhance historic character; and be landscape led, by retaining and strengthening the site's landscape features and character.

DE2 LOCAL CHARACTER AND IDENTITY

- 8.3. This requires development to reflect the positive features that make up the character and identity of the local area and both physically and visually enhance and complement the surroundings. Development within or affecting a valued landscape must have regard to the Joint Local Plan Valued Landscape Assessment (or subsequent update) in accordance with Policy NH5 (District-valued landscapes).

NH1 BIODIVERSITY DESIGNATIONS

- 8.4. This sets out the protection to sites including: Special areas of conservation, SSSIs, Important or Ancient Hedgerows, Legally Protected Species, Local Geological Sites, Local Nature Reserves, Local Wildlife Sites, Priority Habitats and Species, ancient woodland, ancient or veteran trees and Local Wildlife Sites.

NH3 – TREES AND HEDGEROWS IN THE LANDSCAPE

- 8.5. This states that development should make every effort to retain, protect and enhance existing trees, woodlands and hedgerows.

NH6 – LANDSCAPE

- 8.6. This requires development to respond to South Oxfordshire and Vale of White Horse Landscape Character Assessment, National Character Areas and associated profiles and other relevant Landscape Character Assessments in neighbourhood plans; be physically sensitive to and visually integrated into the landscape; preserve settlement character and setting; and maintain the physical and visual separation between settlements.

NH8 – THE HISTORIC ENVIRONMENT

- 8.7. This requires new development that may affect designated and non-designated heritage assets to take account of the desirability of sustaining and enhancing the significance of those assets and put them to viable uses consistent

with their conservation and be sensitively designed so as not to cause harm to the historic environment.

NH9 – LISTED BUILDINGS

- 8.8. This requires development to conserve, enhance or better reveal those elements which contribute to the heritage significance and/or its setting.

NH10 – CONSERVATION AREAS

- 8.9. This requires development to conserve or enhance its special interest, character, setting and appearance and comply with any additional restrictions.

NH11 – ARCHAEOLOGY AND SCHEDULED MONUMENTS

- 8.10. Development must protect the site and setting of Scheduled Monuments and nationally important non-designated archaeological remains.

NH12 – HISTORIC BATTLEFIELDS, REGISTERED PARKS AND GARDENS AND HISTORIC LANDSCAPES

- 8.11. Proposals should conserve and enhance the special historic interest, character or setting of a battlefield, or park or garden on the Historic England Register of Historic Battlefields or Register of Historic Parks and Gardens of Special Historic Interest in England.

NH5 – District-valued landscapes

- 8.12. From my review of LLDR'24 I do not consider that there is sufficient robust evidence to justify the identification of the candidate LLDs and therefore policy NH5.
- 8.13. Policy NH5 refers to LLDs as 'District-valued landscapes'. This does not conform to Guidance on Designating Local Landscape Areas 2020 (GDLLA'20) that recommends that LLDs are named 'Local Landscape Area [Name of place]', or '[Name of place] Local Landscape Area.'
- 8.14. I consider the use of the term 'valued landscapes' in the name of a LLD may cause confusion with the term 'valued landscapes' in NPPF para 180. The judge in the Stroud case was clear that the terms '*valued*' and '*designated*' are distinct and not the same. I consider it inappropriate, confusing and a failure to follow recognised guidance, to use the term 'valued' in the name of a Locally Designated Landscape.
- 8.15. This policy requires proposals which are within an area designated as a district-valued landscape to consider and respond appropriately to the relevant area profile(s) in the Joint Local Plan Valued Landscapes Assessment, which will be used when assessing applications.
- 8.16. Given that the LLD are each based on LCAs, they share the same landscape qualities. Responding to LLD profiles therefore results in considerable overlap to responding to Landscape Character Assessment profiles required by policy NH6.

8.17. I consider that there is considerable overlap between policy NH5 and other landscape related policies. I consider that this may cause confusion and the possibility of multiple reasons for refusal which essentially relate to the same issue/s.

8.18. Given the overlap and the protection given to many aspects of the LLDs by other landscape related policies, I believe that the candidate LLDs should be more focused on smaller geographic areas that clearly, transparently and demonstrably have valued characteristics that are:

‘out of the ordinary and identified as having sufficient landscape qualities to elevate (them) above other more everyday landscapes.’

SUMMARY

8.19. The draft policies in the Joint Local Plan (JLP’24) address landscape conservation, biodiversity, historic preservation, and design requirements for development. Key policies include:

8.20. **DE1 and DE2:** Require high-quality design that enhances local identity and integrates with the landscape, respecting historic context and local character.

8.21. **NH1 and NH3:** Protect biodiversity sites, ancient woodlands, trees, and hedgerows, and emphasize retaining natural elements.

8.22. **NH6:** Calls for developments to respect landscape character, preserve settlement character, and maintain separation between settlements.

8.23. **NH8-NH12:** Focus on conserving heritage assets, listed buildings, conservation areas, archaeological sites, historic battlefields, and registered parks and gardens.

8.24. **NH5:** Defines ‘District-valued landscapes’, requiring developments in these areas to align with the Valued Landscapes Assessment. However, I consider that this terminology may lead to confusion with “valued landscapes” as used in national planning guidance.

8.25. I consider there is overlap in the landscape policies, particularly between NH5 and other landscape-related policies. I consider that candidate Local Landscape Designations (LLDs) be focused on smaller, exceptional areas with unique, highly valued characteristics, rather than broad, overlapping areas that may dilute their significance.

9. Conclusion

- 9.1. I consider that LLDR'24 fails to meet up-to-date national guidance on designating local landscapes and assessing landscape value.
- 9.2. I do not consider that the candidate Chilterns Dipslope LLD meets the criteria for designation. I consider the extent of the area to be too broad and I can find no evidence to demonstrate that the area has 'qualities to elevate it above other more everyday landscapes.'
- 9.3. Given that the example LLD studied in detail fails to meet the criteria for valued landscape or local designation, I consider it reasonable to question the robustness of other candidate LLDs.
- 9.4. I consider that candidate Local Landscape Designations (LLDs) should be focused on smaller, exceptional areas with unique, highly valued characteristics, evidenced using the guidance in TGN'21, rather than broad, overlapping areas that may dilute their significance.
- 9.5. From my review of LLDR'24 I do not consider that there is sufficient robust evidence to justify the identification of the candidate LLDs and therefore policy NH5.



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