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17 June 2022

Dear Ms. Glancy,

MATTER STATEMENT – MATTER 3: GREEN BELT

We write on behalf of our client, Ptarmigan Land Ltd and Bewley Homes PLC in response to the Inspector’s Matters, Issues and Questions published on 29 April 2022. The client has interest in the Land at Secretts, Hurst Farm Milford site (Policy allocation DS14) and has previously submitted written representations in response to the consultation of the new Local Plan Part 2 (LPP2) prepared by Waverley Borough Council (the Council) on 29 January 2021. Alterations to Green Belt boundaries in the Borough are discussed under Matter 3 and the points raised in this Matter Statement relate to Issue (i).

1 Are the exceptional circumstances necessary to make alterations to Green Belt boundaries in respect of the sites listed below (and any other alterations set out in the Plan) fully evidenced and justified, and is LPP2 consistent with the relevant strategic policies for the Borough in this respect?

c. DS14: Land at Secretts, Hurst Farm, Milford

The principle of the case for exceptional circumstances for Green Belt release was established by the Council and agreed by the SoS, in the Local Plan Part 1 (LPP1). The significant need for housing overall, alongside the need to promote sustainable patterns of development across the Borough (meeting localised housing need), the presence of lesser performing Green Belt land, and a lack of alternative sites, were found to justify exceptional circumstances for Green Belt release by the Inspector.

This spatial context has not changed and there would be no justification for LPP2 to deviate from the overall strategy of LPP1 of releasing Green Belt land to help meet the housing needs of the Borough.

LPP1 very clearly sets out that further Green Belt release will be necessary and this will be undertaken through further allocations in LPP2. Policy RE2 states that *'detailed adjustments to the Green Belt boundaries (and Rural Settlement boundaries) around Chiddingfold, Elstead, Milford and Witley'* are to be defined as part of LPP2. LPP2 is necessary to deliver Waverley's housing requirement during the plan-period, focussing on specific settlements, including Milford, where there is an identified residual housing need. This aligns with the identified exceptional circumstances agreed in the LPP1 in using lower quality Green Belt land to deliver localised housing need.

Further to this point on localised housing need, DS14 is included in the Witley Neighbourhood Plan (WNP) as a housing allocation. This demonstration of community support for the delivery of further housing in tightly wrapped Green Belt settlements is significant in highlighting how DS14 epitomises the envisioned exceptional circumstances of LPP1.

The release of Green Belt land to allow DS14 to be allocated for housing is therefore supported by the already established exceptional circumstances, but also through the suite of evidence submitted by both the Council and our client throughout the Local Plan process. Documents including but not limited to The Wood Study, the Council's Green Belt Topic Paper, the site-specific Landscape and Green Belt Appraisal (submitted with our Regulation 19 representations), and the Site Allocation Topic Paper. DS14 was shortlisted by the Wood Study, meaning it was identified as land within the Milford and Witley area that was contributing the least to the Green Belt. The presence of a readable existing boundary feature and sense of enclosure of the site were also noted to contribute to the circumstances justifying the specific release of this site. In short, there are established exceptional circumstances at a strategic and site level that fully evidence and justify the allocation of DS14.

In addition to the council's evidence base, a further Green Belt Assessment prepared by The Richards Partnership for the site has been prepared and is provided at **Appendix 1**. The report reaffirms the conclusions of the Wood Green Belt Appraisal in that the development of the site would have only a moderate to limited harm to the Green Belt.

LPP2 is in complete conformance with the strategic policies of LPP1 in its identification of Green Belt release and housing allocation at DS14. It identifies areas for housing in line with the Spatial Strategy, outlined in Policy SP2, which specifically requires moderate development in Milford. The requirement of 480 homes in Witley and Milford is stated in Policy ALH1. The delivery of housing that contributes towards this overall requirement is therefore in line with the strategic policies aforementioned. LPP2 amends the Green Belt boundary, in line with the specification of Policy RE2, on the basis of a sound assessment of the best suited land for release, in line with other important factors in the site selection process, such as AONB.

Counsel Opinion from Sasha White QC, provided to our client in February 2018 (provided at **Appendix 2**), provides some relevant points regarding the consistency of identifying land in LPP2 for housing through the amendment of Green Belt boundaries, which are as follows:

- Policy SP2 notes that additional sites will be identified and allocated through LPP2 and Neighbourhood Plans;
- The delivery of Policy SP2 is specifically noted to be through Neighbourhood Plans;
- The overall allocation of ALH1 is for 480 units which is significant;
- Policy RE2 is clear that adjustments can be made to Green Belt boundaries; and
- The Planning Inspector for LPP1 (at paragraph 74 of his report) made it clear that boundaries would be defined in LPP2.

The answer to MIQ 1(c) of Matter 3 as set by the Inspector is therefore a very clear confirmation that both exceptional circumstances and conformity with strategic policies are in place in the Green Belt release and allocation of DS14.

2 Do the Green Belt boundary alterations made as a result of Policy DS14: Land at Secretts, constitute “detailed amendments”/ “detailed adjustments” for the purposes of the Framework and Policy RE2 of LPP1.

Insofar as the National Planning Policy Framework (NPPF) is concerned, Paragraph 140 states that *‘where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.’* Paragraph 142 goes on to state that *‘when drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.’*

The NPPF identifies both Development Plans and Neighbourhood Plans as appropriate mediums for the amendment of Green Belt boundaries. LPP2 and WNP are therefore both well within national policy in proposing alterations to the Green Belt boundary. This is supported by the establishment of the need for Green Belt release having been agreed in the adoption of LPP1, as set out above. DS14 has been identified as a sustainable location for development by the Council and Witley Parish Council, as also set out above.

LPP1 is clear in its assertion that further amendments are required in respect of specific settlements, including Milford (Policy RE2 and Policy SP2). The allocation of individual sites and alterations to boundaries through LPP2 is a matter of detail that delivers on the strategic establishment of need for housing and Green Belt release. The specific alterations, such as that to release DS14 from the Green Belt, are a result of ‘detailed’ site assessment and settlement boundary work undertaken, which is in line with the implementation of detailed amendments as envisioned in the NPPF. This is clearly the intention of LPP1 as articulated in the Inspector’s Report to the LPP1 Examination (February 2018) which states, at Paragraph 74:

“The plan therefore proposes the release of these villages from the Green Belt, together with some areas of additional land, including land opposite Milford Golf Course and some other modest areas adjacent to the villages, the precise boundaries of which would be defined by Local Plan Part 2.”

Policy RE2 and its subtext are particularly important in assessing / establishing the consistency between the proposed allocation DS14 and the strategic policies of LPP1. The sub-text to Policy RE2 and supporting image (Plan 5) identifies three “broad areas for potential adjustment to Green Belt boundary”. The policy text itself, however, does not refer to these areas or limit where the potential changes to the Green Belt around Milford may be located. The policy states:

“The following changes to the Green Belt will be made in Local Plan Part 2, with the boundaries to be defined following consultation with local communities:

- *Detailed adjustments to the Green Belt boundaries (and Rural Settlement boundaries) around Chiddingfold, Elstead, Milford and Witley.”*

It is well established that the supporting text to a policy cannot override the wording of policies in a development plan document. Therefore, the references to the locations on Plan 5 in the sub-text to the policy can only be read as illustrative as they are, ultimately, legally irrelevant.

In fact, the allocation of Policy DS14 and the site has fully followed the requirements of Policy RE2 of LPP1 in that it has directly followed engagement with the local community. The site is identified within the Witley Neighbourhood Plan (WNP) as the preferred location for green belt release and housing development in the village. The Neighbourhood Plan, at paragraph 4.4 sets out:

“The community’s feedback to WPC and the NPSG is that the community’s preferred location for residential-led development is the land associated with Secretts Farm. Residential-led development in this location would have the benefit of delivering in full the remaining LPP1 housing requirement for the Parish on a single site, whilst also potentially providing, but not limited to, a new village park which would act as a SANG, space for new shops (including a new Secretts Farm Shop and café), space for other community facilities such as new sports facilities, and a rural business centre.”

Furthermore, the Neighbourhood Plan (Paragraph 4.3) notes that the location of alternative growth options to the west and north west of the village were not preferable given their location in the AONB and proximity to the centre of the village:

“However, the community is concerned that the land associated with these three areas is located within the AONB, is distant from the local centre, and that in addition to providing housing, the individual sites this area includes are potentially too small to provide new on-site community facilities and / or local employment opportunities.”

The AONB consideration is further set out in our response to Matter 6, however, it is important to note here that previous iterations of LPP2 that were consulted on resulted in strong objections from the Surrey Hills AONB Board contesting that the Secretts site was preferable to the other sites west of Milford which all fell within the AONB (**Appendix 3**).

Clearly, therefore, the allocation of policy DS14 is carrying out the requirements of Policy RE2 by following the identified (and adopted) preferences of the local community as set out explicitly within the WNP.

The Council sought their own legal opinion, as referenced in Paragraphs 3.1 and 3.2 of the Green Belt Topic Paper, as to the legality of identifying areas such as DS14, which were not within the broad areas shown in LPP1. This confirmed that there was nothing in law to prevent the consideration of other sites for Green Belt release as part of the detailed amendments envisioned. Our own Counsel Opinion (**Appendix 2**), referenced above, also confirmed that the alterations proposed by LPP2 for Green Belt release, specifically DS14, were within the scope of LPP2.

It is therefore clear that the alterations to the boundary in respect of DS14 are fully consistent with the intentions of the scope of LPP2 as originally intended in LPP1.

5 Are the Green Belt boundary alterations which the Local Plan Part 2 seeks to make clearly expressed in the Plan and are the spatial implications of these adequately captured on related proposed changes to the Policy Map; and would boundaries be defined clearly using physical features that are readily recognisable and likely to be permanent.

The site boundary at land at Secretts, Hurst Farm is depicted in changes to the adopted Policies Map, specifically on Map 23, which shows an updated settlement boundary for Milford. There is also a minor amendment as detailed in the Minor Modifications to Local Plan Part 2 documents (MOD40). Therefore, the proposed changes are clearly and spatially expressed through LPP2.



The definition of Green Belt boundary for land at Secretts has capitalised on the current boundaries and sense of enclosure afforded to the site via the heavily planted border that marks the north-eastern boundary of the site allocation. This border is referenced by the Wood Study and Green Belt Topic Paper as part of the reasoning for the site's Green Belt release. That this tree belt provides existing screening was noted by the Council to reduce the impact of development on wider landscape (Paragraph 2.22 of Housing Topic Paper). The site as existing already benefits from significant and permanent boundary definition and enclosure.

As recommended mitigation within the assessments, this already significant marker in the landscape will be further strengthened by the proposals (**Appendix 1**). The landscaping scheme, proposed as part of the scheme for the site that is currently undergoing pre-application discussions, will create an ecological corridor reinforcing and strengthening the permanence to this boundary. Furthermore, the proposals provide an opportunity to create a clear and well defined defensible boundary to the north-western Green Belt boundary through a strategy of new thick planting and the creation of appropriate Green Belt land uses for SANG and playing fields that will afford greater land-use protection to future development pressures. The SANG will be transferred to an appropriate land-trust to manage and maintain the SANG in perpetuity. The playing fields will likely be transferred to the Parish Council to then be used as sports pitches for the local football club the Milford Pumas.

Summary

We hope these representations are useful in the Inspectors consideration of Matter 3 Green Belt and we will be attending the Hearing Session regarding Green Belt on the 12th and 13th July 2022. This Hearing Statement has set out the following:

- The exceptional circumstances, both for the delivery of housing and the identified of localised sites such as in Milford via DS14, were established in LPP1 and further evidenced and delivered in LPP2.
- DS14 has been identified as a result of clear evidence and lesser impact on the Green Belt, as well as being supported and allocated by the WNP.
- The strategic policies of LPP1, namely Policies SP2, ALH1 and RE2, envision further Green Belt release and delivery of housing in Milford. The allocation of DS14 is therefore a detailed amendment and consistent with the adopted strategy.
- Counsel Opinion, commissioned by our client, supports this view.
- DS14 benefits from an existing and readily recognisable boundary feature that will be further strengthened to form a strong permanent physical edge to the settlement of Milford.

Word count: 2432 words.

Yours faithfully



Michael Wood
Technical Director



APPENDIX 1 - GREEN BELT ASSESSMENT

Land at Secretts Farm, Milford: Green Belt Appraisal

Local Plan Part 2: Representations to Waverley Borough Council

for Ptarmigan Land Ltd and Bewley Homes PLC

BEWLEY
HOMES



PTARMIGAN LAND

June 2022

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Revisions				
Revision	Date	Description	Prepared by	Approved by

Document No 22-12-CR01 — Land at Secretts Farm, Milford, Green Belt, Appraisal				
Prepared by:	PJR	Chartered Landscape Architect		June 2022
Reviewed by:	JBG	Chartered Landscape Architect		14.06.2022
Approved by:	PJR	Chartered Landscape Architect		16.06.2022

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- 3.0 Appraisal
- 4.0 Summary

Acronyms:

WBC – Waverley Borough Council
TRP – The Richards Partnership
LPP1 – Local Plan Part 1
LPP2 – Local Plan Part 2
EIP – Examination in Public
NPPF – National Planning Policy Framework
AONB - Area of Outstanding Natural Beauty
SANG – Suitable Alternative Natural Green Space

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Figure 1: Planning Application Masterplan (The Noble Consultancy)



Project: Land at Secretts Farm, Milford
Date: June 2022
Client: Plannigan Land Ltd and Bewley Homes PLC

1.0 Introduction

1.1 The Richards Partnership (TRP) were appointed by Ptarmigan Land Ltd (Ptarmigan) and Bewley Homes PLC (Bewley) to advise on Green Belt, landscape and visual matters associated with their promotion of Land at Secretits Farm, Milford (the site) in support of the Waverley Borough Council (WBC) Local Plan Part 2 (LLP2) Examination in Public (EIP) scheduled to commence in the summer 2022.

1.2 Ptarmigan and Bewley are currently in the later stages of preparing a planning application for the development of the site comprising circa 220 dwellings, a replacement farm shop, a doctors' surgery, flexible office space and new sports pitches (see Figure 1). The sports pitches are located on land which it is proposed to be retained as Green Belt. Ptarmigan and Bewley submitted a planning application for a Suitable Alternative Natural Green Space (SANG) on land to the north of the proposed sports pitches in (Guilford Borough Council application ref. 21/P/02674). It is anticipated/understood that this SANG would be delivered as part of the housing application by a 106 Agreement and would remain within the Green Belt.

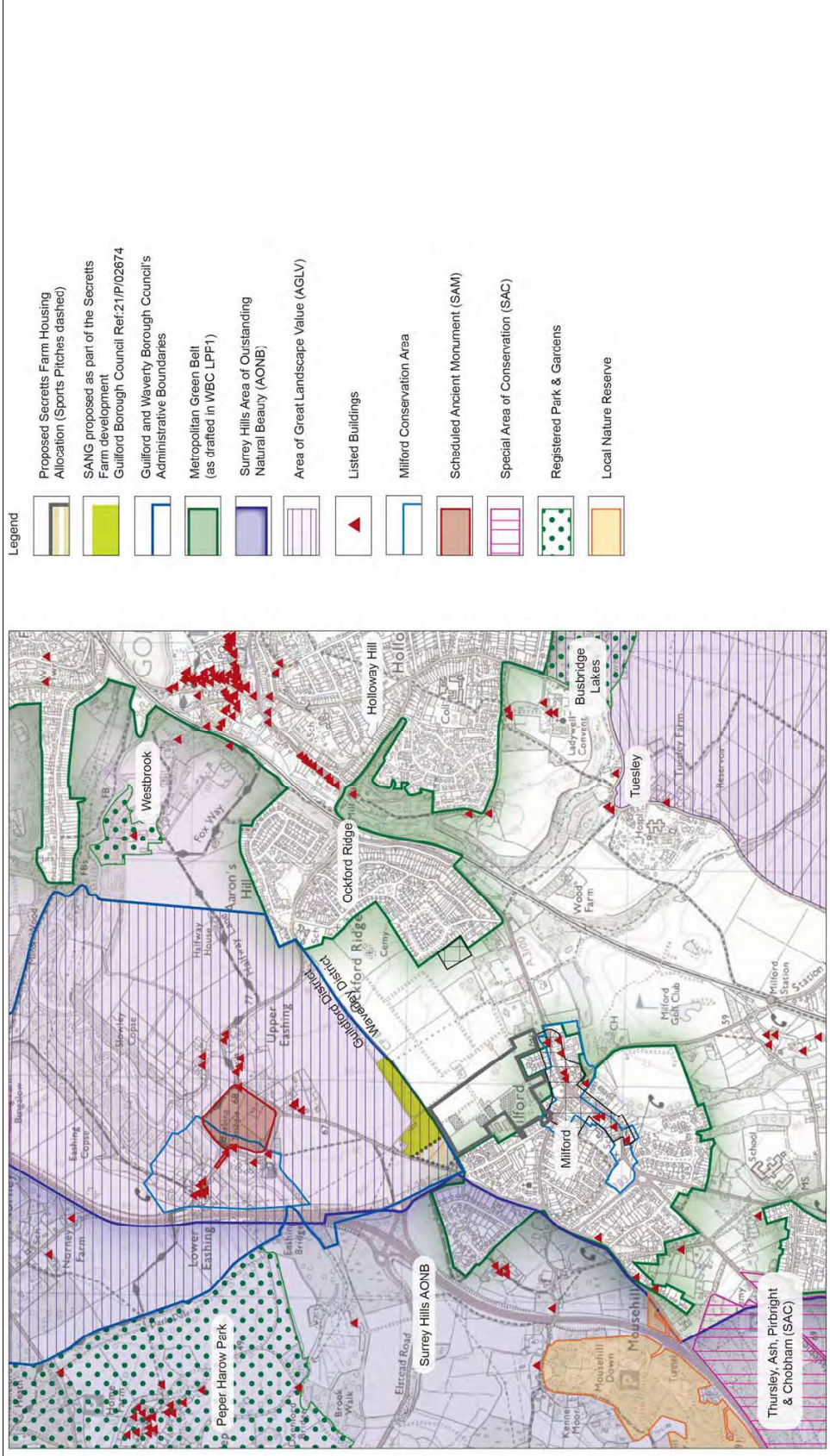
1.3 This report will consider the councils current Green Belt evidence base and, in light of these findings and recent Supreme Court case law (Samuel Smith Old Brewery & others v North Yorkshire County Council 2020 UKSC3) concerning the judgement of openness in assessing Green Belt, will provide an updated assessment of the site's Green Belt role and the harm that would arise to the surrounding Green Belt should it be released and the proposed housing development introduced.

1.4 The proposed development site is located on a site measuring approximately 15.3 hectares adjacent to the northern edge of Milford in Waverley District. Currently, the site is intensively farmed agricultural/horticultural land and includes a range of small to large glasshouses and polytunnels with their associated laydown and storage areas (see Figure 2). This intensively farmed landscape stretches from the eastern edges of Milford to the western edge of Godalming approximately 0.9 to 1.2kms to the north-east. The south-western corner of the site is occupied by Secretits of Milford farm shop and its associated parking area. In contrast to the intensively farmed landscape which occupies most of the site, there is a linear managed parkland with two ponds running along the southern side of Secretits Farm. This parkland backs onto the houses and Squires Garden Centre, which run along the A3100 Portsmouth Road connecting Milford and Godalming.

Figure 2: Site Location and Urban Context



Figure 3: Planning Context



Project: Land at Secrets Farm, Milford
 Date: June 2022
 Client: Pannigan Land Ltd and Bewley Homes PLC

- 1.5 The site is currently situated within the Metropolitan Green Belt (see Figure 3). The adopted Waverley Borough Council (WBC) Local Plan Part 1 (LLP1) Policy ALH1 identifies a number of 'strategic sites' which includes Milford/Witley as a 'Large Village' and should contribute 480 homes in the plan period.
- 1.6 The emerging WBC Local Plan Part 2 proposes to remove the Secretts site from the Green Belt as part of the WBC Policy DS14 – Land at Secretts. The emerging allocation is for 177 dwellings, the provision of a new local centre and rural business centre, the relocation of the existing farm shop and the provision of sports pitches.
- 1.7 WBC have commissioned two Green Belt reviews/appraisals to inform their Local Plan. Amec Environmental and Infrastructure Ltd (Amec) provided the Green Belt Review (Parts 1 and 2) dated August 2014 in support of the LLP1. In preparation of LLP2 Wood Environment and Infrastructure Solutions UK Ltd (Wood) provided the Green Belt Site Appraisals: Milford/Witley and Wormley (August 2020). These reports will be considered in Section 2 of this report.
- 1.8 Section 3 will provide The Richards Partnership's assessment of the site's performance in relation to Green Belt purposes and, with the benefit of the development proposals, an assessment of the proposed developments effect on physical and visual opened, and should the site be released from the Green Belt and the proposed development introduced the potential harm to the surrounding Green Belt.
- 1.9 Section 4 will provide a Summary.

2.0 Waverley Borough Council's Green Belt Evidence Base

2.1 As noted in the Introduction to this report the site has been the subject of a number of Green Belt studies/ reviews. In addition to the studies undertaken on WBC's behalf Plannigan instructed LDA Design to prepare a Landscape and Green Belt Assessment in 2016 in support of the LPP2 Representations.

2.2 The Amec review prepared in support of the WBC LPP1 was undertaken and published in two parts:

- Part 1: Strategic Assessment of Green Belt Purposes (August 2014)
- Part 2: Assessment of Areas of Search (August 2014)

2.3 The Amec Review Part 1 review identified and assessed broad parcels around the borough's settlements. The site is located in Parcel C17 which extends between Milford and Godalming (see Figure 4).

2.4 The Amec Review Part 2 concluded that with regards to 'Land around Milford and Witley (Segments C1-4, C6, C13-17)' there is:

1. "Potential to insert villages with an amended development boundary"
2. "Potential for release of land at various locations around the villages and setting of long-term village development boundary".

2.5 As shown in Figure 5, the Amec Review Part 2 identified the Secretis Farm site as a small part of Segment C17. Segment C17 is found to make a

- 'Contribution' to checking unrestricted sprawl;
- 'Limited Contribution' to the merging of towns;
- 'Contribution' to safeguarding the countryside from encroachment; and a
- 'Significant Contribution' to preserving the setting of historic towns.

The reports overall evaluation states,

"In predominantly agricultural use, this segments plays an important role in maintaining the context for Godalming and the wider countryside to the west (strategically located to Parcel F19 of the Guildford Green Belt Review)".

The overall contribution to Green Belt purposes is recorded in this assessment as 'Significant Contribution'.

2.6 The Amec Part 2 Green Belt Review references the Guildford Green Belt Review and Parcel F19 to the north of Segment C17, as part of the review's overall evaluation of Segment C17. Parcel F19 adjoins Segment C17 and is considered within Guildford's assessment which concludes Parcel F19 meets four of the Green Belt purposes and is considered to be of 'high Green Belt sensitivity'.

Figure 4: Part 1 Segments around Milford Map (Amec Green Belt Review)

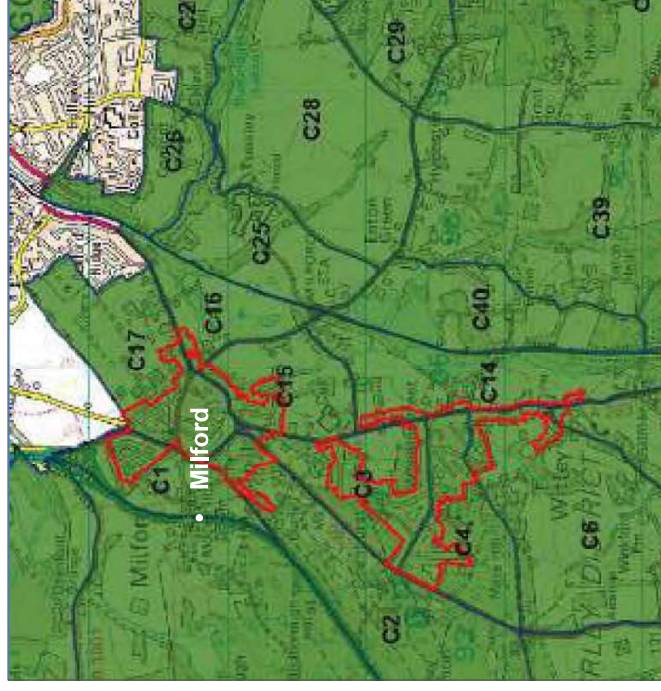


Figure 5: Part 2 Segment C17 Assessment Sheet (Amec)

Segment	C17: land lying between Godalming and Milford, bounded by the A3100 to the south east and the Borough boundary to the north west.
Checking Sprawl	Contribution – helps contain development associated with the A3100
Preventing Merger	Limited Contribution
Safeguarding from Encroachment	Contribution – helps contain Godalming
Historic Setting	Significant Contribution – part of the southern gateway to Godalming
Overall Evaluation	In predominantly agricultural use, this segment plays an important part in maintaining the context for Godalming and the wider countryside to the west (strategically related to parcel F19 of the Guildford GB Review).
Overall Contribution to GB Purposes	Significant Contribution

2.7 This report concurs with the LDA Design report which identifies the following methodology deficiencies in the Amec review:

1. There is a lack of descriptive narrative and justification provided for each segment
2. The specific wording of the assessment criteria (Appendix 2) which misapplies some of the Green Belt tests
3. The inclusion of other issues beyond those of the five purposes of the Green Belt, such as landscape sensitivity and capacity, constraints and sustainability and how these have influenced judgements made in relation to Green Belt Purposes (Page 13, Para 3.3.3)

2.8 In addition to these points, this report notes that some care needs to be taken with regards to the Amec Review conclusions and, in particular, the conclusion it draws with regards the Secretts site, given the significant difference in scale between:

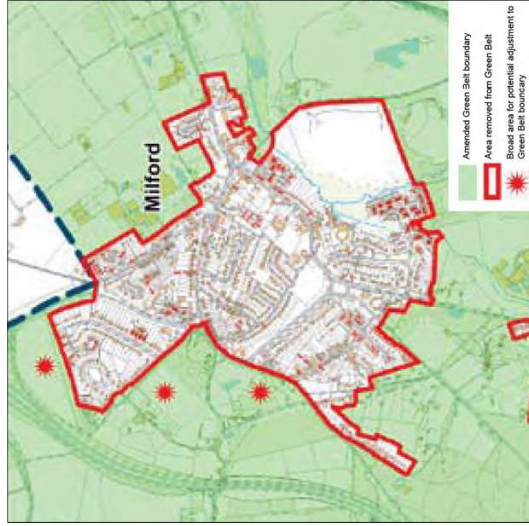
1. The Amec Review conclusions and recommendations which clump together and provide conclusions based on Segments C1-C4, O6, C13-C17
2. The Amec Review findings for Segment C17
3. The Secretts site.

The principle differences are that Segment C17 stretches from Milford to the south all the way to Godalming in the north-east – a distance in excess of 1.7kms, and covers an area of approximately 108 hectares. This is significantly different scale/area from the Secretts Housing site which covers an area of approximately 15 hectares, i.e. 14% of Segment C17.

2.9 As shown above these assessments consider areas and segments of a significantly difference scale to the notably smaller land parcels required to deliver the LPP2 housing targets. The relative large sizes of the segments assessed in the Amec Review leads to over inflated levels for the anticipated effects on the Green Belt purposes.



Figure 6: Plan 5 Broad Areas of Study Plan (Amec)



2.10

LPP1 Policy RE2 did not identify specific areas for future allocations in the LPP2, but directs that they should be informed by consultation with the local community. The only notional locations for growth were sites to the west of Milford as shown in Plan 5 of the WBC LPP1 (page 120) - identified three – see Figure 6: Plan 5 from the WBC LPP1 (page 120). In identifying these 'broad areas' Policy RE2 states,

"The following changes to the Green Belt will be made in Local Plan Part 2, with the boundaries to be defined following consultation with local communities: Detailed adjustments to the Green Belt boundaries (and Rural Settlement boundaries) around Chiddingfold, Elstead, Milford and Witley" (author's highlighting)

2.11

The LDA Design Landscape and Green Belt Appraisal (2016) differed from the earlier Amec Review in that it specifically assessed the Secrets Farm site. In addition to assessing its green belt credentials, it also considered the landscape and visual attributes of the site and its environs as well as considering the likely harm to the surrounding Green Belt should development be come forward. This assessment concluded that the Secrets Farm site makes 'Limited Contribution' to the four Green Belt Purposes and, having considered the landscape character and visual aspects of the area the site,

'could be removed from the Green Belt without harm to this designation and developed without significant landscape and visual effects' (Para 6.1.7).

2.12

In the preparation of LPP2 and the identification of Green Belt release land, WBC initially focused their attention on the three broad areas identified in Plan 5 of LPP1 Policy RE2 – land to the west and north of Milford. However, the council received a number of representations questioning the appropriateness of these three broad areas given their location within the Surrey Hills Area of Outstanding Natural Beauty (AONB) (see Figure 3), and contended that other sites were considered more appropriate. It is understood these representations included a number from Witley Parish, who were in the process of preparing the Witley Neighbourhood Plan and noted they favoured the Secrets Farm site.

2.13

In addition the council received strong representations from the Surrey Hills AONB who noted,

"There is a major issue with regard to the 220 dwellings proposed in the AONB and Milford"

(Part 1 of the Surrey Hills AONB consultation response dated 6th July 2018). Under Section 2.2 Milford of this submission, the AONB questioned the council's consideration and adoption of their own landscape character assessment work in the LPP1 of the council's initial preference for potential development on land to the west of Milford and states:

"In my judgement, the 4 AONB sites have not been shown to be any more suitable for housing than the Secrets Site, rather the reverse. The AONB sites are separated from most of Milford by the old A3 [they] are not located adjacent to its centre, as is the Secrets site, and are a greater distance from Milford Railway Station. In short they are not, as sustainably located as the Secrets site." (Page 8, last paragraph).

With regards the merits of the four AONB sites in Milford versus the Secrets site, the report states:

"The AONB should deservedly only be considered for development to meet objectively assessed housing needs as a last resort when all other possibilities have been exhausted".

2.14

The consideration of this point is significant to the EIP given the NPPF (2021) makes it clear in Para 176 that,

"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, The Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues" It continues, "The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas"

2.15

In support of LPP2, and in recognition that further Green Belt releases around Milford and Witley are required to meet the LPP1, WBC commissioned Wood (Wood Environment & Infrastructure UK Ltd) to undertake a study of potential site allocations. This work is provided in the Waverley Borough Council, Green Belt Appraisals: Milford, Witley & Wormley (August 2020) the 'Wood Report'. This report considered 24 sites around Milford, Witley and Wormley as shown in Figure 7 taken from the Wood Report (Figure 1.1). The assessment methodology differed somewhat from the earlier Amec Review in that:

1. The methodology included a different set of criteria for considering Green Belt Purposes

2. In light of the Supreme Court ruling Samuel Smith Old Brewery v North Yorkshire County Council, the methodology provided an assessment of visual and physical openness and boundary quality.

3. Using a five point scale, the methodology provided a concluding assessment on the degree of harm to the Green Belt arising from development

2.16

The Wood Report identified the Secrets Farm site as 'Site 0923 – Land between Portsmouth Road and Chapel Lane (Secrets Garden Centre), Milford' (Figures 7 & 8). With regards to the site, the report concluded that, **"The harm to the Green Belt is judged**

Figure 7: LLP2 Wood Report Sites Map (Extract)

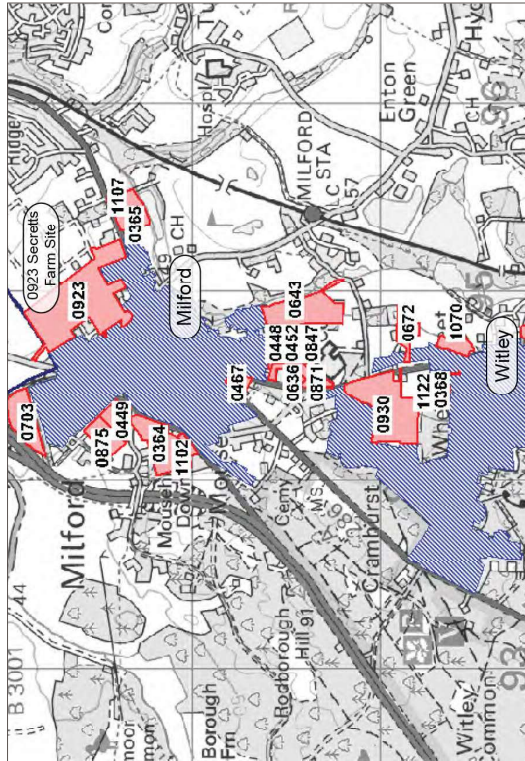


Figure 8: Site 0923 (Wood Report)

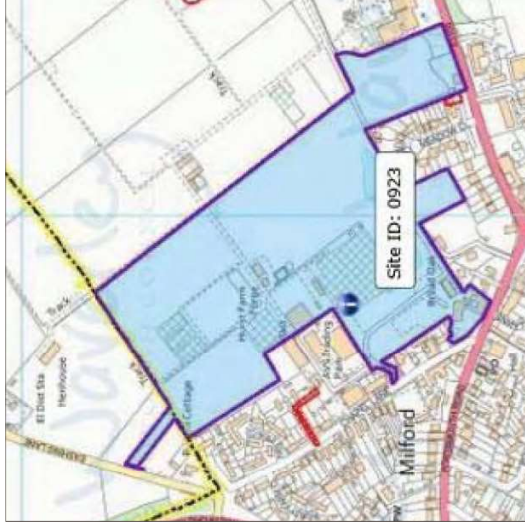


Figure 9: Wood Report Assessment of Site 0923

Site	Overall Contribution to the Green Belt	Physical Openness	Visual Openness	Boundary Quality	Likely Degree of Harm to the Green Belt	Recommended for further consideration against other planning criteria
Site 0923 - land between Portsmouth Road and Chapel Lane (Secretts Garden Centre), Milford	Contribution	Mixed - site is 50% developed	Mixed - limited views into and within the site	Mixed - insubstantial external boundaries	The harm to the Green Belt is judged to be Moderate to Limited, reflecting the partly developed character of the site which compromises physical and visual openness and which not be substantially altered by residential development, proximity to the developed edge of Milford and the opportunity to create an outer edge to the built extent of the village in this location. Particular attention to the outer boundaries of any development would be required in order to create a substantive limit to ensure physical containment and thus permanence.	Yes

3.0 Appraisal

in relation to Green Belt purposes and, with the benefit of the development proposals, the potential harm to the Green Belt associated with proposed development

3.1 For ease of comparison, this report and assessment adopts the same methodology (and assessment scales) for the assessment of Green Belt Purposes as both the Aneec Review (2014) and the LDA Design Report (2016). With regards to the assessment of Degree of Harm to physical and visual openness and resulting harm this report uses the Wood Report five point scale (see Figure 10).

Purpose 1 – Checking the unrestricted Sprawl of large built up areas
“Sprawl – spread out over a large area in an untidy or irregular way. Large built-up areas – in the context of this study this is Greater London” Definition provided in the LDA Design Report (Para 3.2.8)

3.2 With reference to Figure 11, it is considered that Milford is a relatively compact village and the introduction of the proposed development would be consistent with the village’s nucleated form. It would not result in unrestricted sprawl.

3.3 The proposed site has a strong urban context and is well contained by the existing boundary along and off Chapel Lane and the A3100 Portsmouth Road. Squires Garden Centre forming two of the site’s four boundaries.

3.4 The proposed site has a substantial evergreen thuja/cypress windbreak along its north-eastern boundary. As shown in Figure 1, the masterplan proposals provide for reinforcing this edge with additional native hedgerow and tree planting. In addition a new belt of native structure planting measuring **circa 18 metre** would be introduced along the site’s north-western boundary. These existing and proposed tree belts would provide a definitive and defensible edge should land be released to facilitate development.

3.5 In concur with the LDA Design Appraisal (2016) that the existing glass houses, polytunnels and associated market gardening infrastructure do not provide an appropriate, nor definitive, Green Belt boundary between existing urban edge and the adjoining countryside.

3.6 In consideration of the above, and the of development proposals (now with WBC), this assessment (this report) concurs with the earlier Aneec Review (2014) and the LDA Design Green Belt Appraisal (2016) both of which considered that the site makes a ‘Limited Contribution’ to checking unrestricted sprawl, and development proposals would not result in unrestricted sprawl.

Purpose 2 – To prevent neighbouring towns merging into one another
“Neighbouring towns – Godalming, Farnham, Guildford, Aldershot. Merging – this can be by way of sprawl (above) or, “Ribbon Development” – the building of houses along a main road, especially one leading out of a town or village (Oxford Dictionary Online). This includes historic patterns

Figure 10: Table 3.4 – Extract from the Wood Report

Table 3.4 Degree of Harm to the Green Belt arising from Development and Assessment Criteria

Degree of Harm to the Green Belt	Assessment Criteria
Significant	Clear adverse effects of development on physical and/or visual openness and permanence which is unlikely to be able to be successfully mitigated.
Moderate to Significant	Adverse effects of development on physical and/or visual openness and permanence with potential opportunities for mitigation.
Moderate	Mixed effects of development on physical and/or visual openness and permanence with opportunities for mitigation.
Moderate to Limited	Lesser effects of development on physical and/or visual openness or permanence, with clear opportunities for mitigation.
Limited	No discernible effect of development on physical and/or visual openness and permanence.

Figure 11: Urban Context



of, or current pressures for, the spread of all forms of development along movement corridors, particularly major roads." Definition provided in the LDA Design Report. (Para 3.2.8)

3.7 Milford is situated to the south-west of Godalming, with access between the two settlements provided by the A3100 Portsmouth Road. As shown on Figure 11, Milford is approximately 840 to 1180 metres to the south-west of Ockford Ridge, a suburban parish and part of Godalming (33%-24%). The proposed site is approximately 550m to 840m to the south-west of Ockford Ridge.

3.8 As shown in photographs 1-4 (Figures 2 and 11), there are a number of significant inter-lying physical barriers between Ockford Ridge and Milford in the form of the intervening evergreen windbreaks and woodland trees. Together these windbreaks and woodlands greatly limit any views from the houses along the western side of Ockford Ridge (Primrose Hill) and for visitors to Eashing Cemetery (see photographs 1-4).

3.9 In addition, the site plays little or no visual role in the views as experienced by motorists, cyclists and pedestrians travelling along Portsmouth Road (A3100) (see photograph 5).

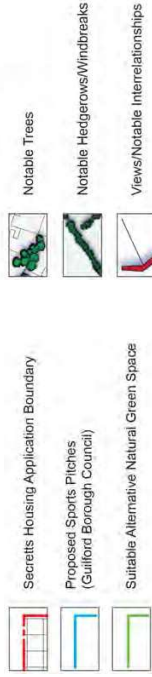
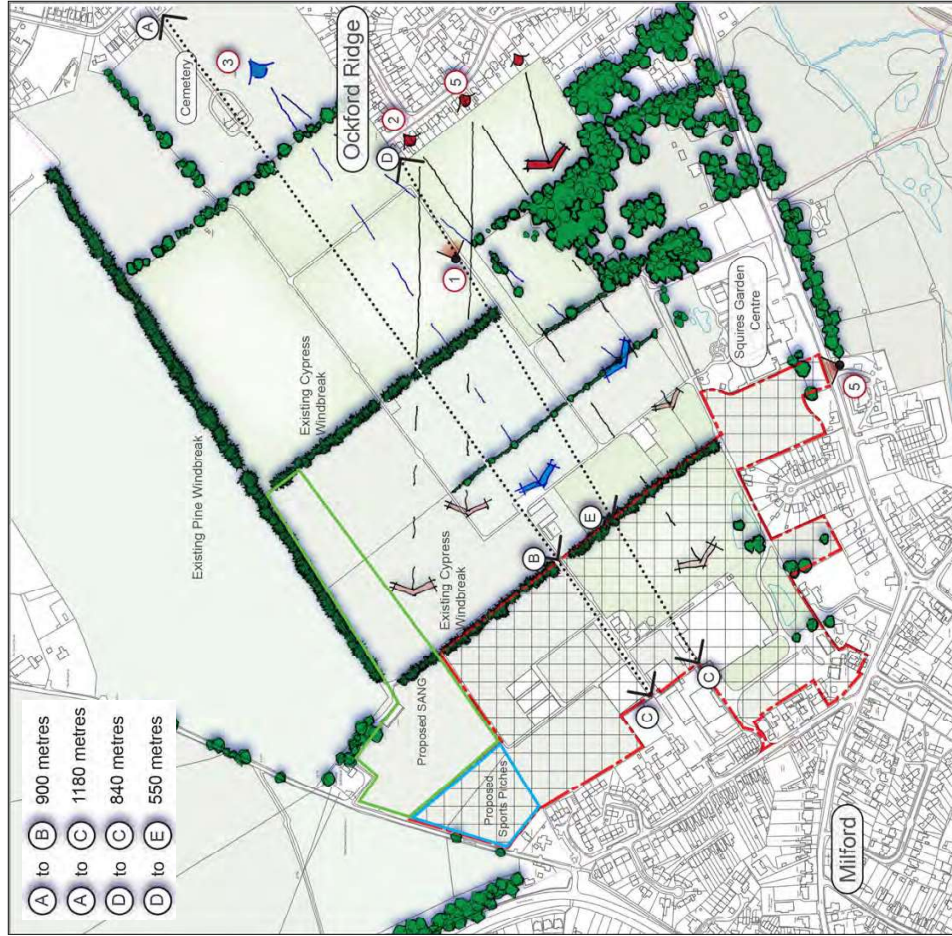
3.10 The development proposals would have no adverse effects on the evergreen windbreak trees which form the site's north-eastern boundary. Subject to discussions with WBC, the development would bring forward a management plan to ensure they are managed in a manner to safeguard and enhance their longevity. The existing trees would also be reinforced with new tree planting.

3.11 In light of the above, it is considered that the site makes a limited contribution to preventing the merging of Godalming and Milford. Removal of the site from the Green Belt and the introduction of the development proposals would not result in the merging of these towns and a substantial area of undeveloped land between the settlements would remain. The visual and physical separation experienced by local residents and people travelling along the A3100 between Milford and Godalming would remain.

Purpose 3 – To assist in safeguarding the countryside from encroachment

"Encroachment – a gradual advance beyond usual or acceptable limits (Oxford Dictionary Online). The countryside – open land with an absence of built development and urbanising influences, and characterised by rural uses including agriculture and forestry. Relevant landscape character or quality designations will be taken into account in assessing the role of the Green Belt in safeguarding countryside. Openness – absence of built development or other urbanising elements (not openness in a landscape character sense – topography and woodland/hedgerow cover)." Definition provided in the LDA Design Report (Para 3.2.8)

Figure 12 : Milford Visual Appraisal



3.12 The WBC LLP1 removed most of the Milford built up urban area from within the Green Belt having reviewed its boundaries (see Figure 6). A notable exception to this is the employment land associated with the AVS Trading Park which was retained within it. This relatively small employment/light industrial area includes a number of large warehouses and their associated external laydown areas. Whilst the existing agricultural uses of Secretis Farm (including the large glasshouses) are considered appropriate development within the Green Belt under Paragraph 149 of the NPPF these employment/light industrial buildings and uses are not.

3.13 The large glasshouse and the associated parking and supporting laydown area are more in keeping with the character of the adjoining AVS Trading Park and the urban area of Milford than the open, agricultural character of the landscape to the east of the large glasshouses and polytunnels.

3.14 The proposed redefining/repositioning of the green belt boundary along the mature evergreen windbreak to the north-west would provide a clearer, more definitive and defensive Green Belt boundary.

3.15 The introduction of the proposed development would retain this evergreen tree belt and reinforce it and would provide a new circa 18 metres wide structure belt along the north-western side of the development. The proposed SANG and the provision of sports pitches as part of the new development are consistent with NPPF paragraph 145 which states:

"Local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access, to provide for outdoor sport and recreation; to retain and enhance landscape and visual amenity and biodiversity".

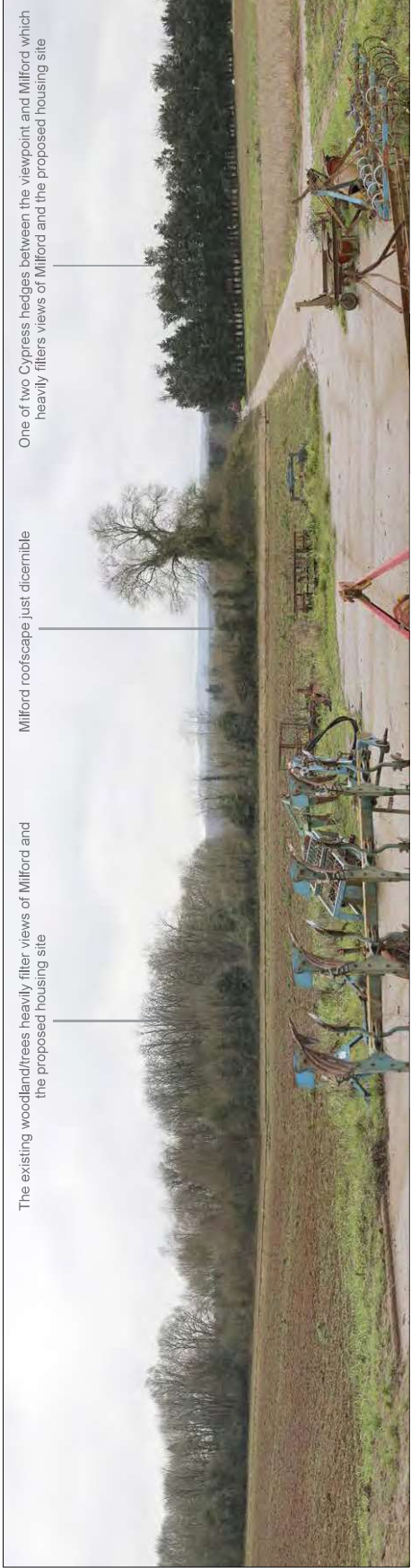
3.16 The provision of the sports pitches and the adjoining SANG would accord with these NPPF requirements and they would assist in retaining and enhancing new definitive, defensible boundaries along the north-western edge of the proposed housing site.

3.17 In consideration of the above, it is judged that the site plays a 'Limited Contribution' to safeguarding the countryside from encroachment. The introduction of the development proposed would reinforce these features as well as introducing sports pitches and a SANG both of which are provided for and encouraged within the NPPF.



Houses off Primrose Hill (Ockford Ridge) with views south towards Milford

Viewpoint 1. View looking northeastwards towards the Primrose Hill (Ockford Ridge) houses showing the windows and garden areas which enjoy views southwest over the farmland between Ockford Ridge and Milford.



The existing woodland/trees heavily filter views of Milford and the proposed housing site

Milford roofscape just discernible

One of two Cypress hedges between the viewpoint and Milford which heavily filters views of Milford and the proposed housing site

Viewpoint 2. View from the rear garden of house at the northwestern end of Primrose Hill. Residents views of the two glasshouse relocation sites are heavily filtered/screened by the intervening existing woodland trees and the evergreen windbreak.

Purpose 4 – To preserve the setting and special character of historic towns

"Historic town – settlement or place with historic features identified in local policy or through conservation area or other historic designation(s)"
Definition provided in the LDA Design Report (Para 3.2.6)

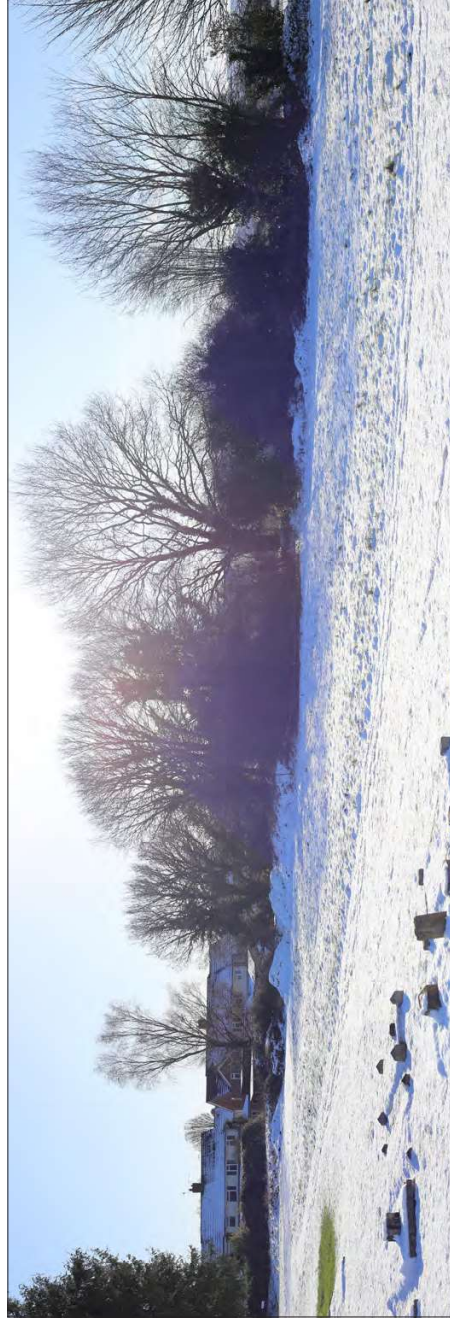
3.18 As noted earlier in this report, there are limited views of the site from the A3100, with only a short section of approximately 40m abutting the road (see photograph 5). As shown in photograph 5, taken from the A3100 opposite the proposed relocated Secretts Farm Shop site, the existing housing, the Squires Garden Centre and the wealth of tall hedges and trees within and around the houses largely conceal the site. Similarly, as shown in photograph 5, the proposed relocated Secretts Farm Shop and its associated car park would be largely concealed behind the existing, mature evergreen hedge and the surrounding trees and buildings. In consideration of this, it is judged that the site and the proposed development would not play a significant role in the experience of motorists travelling along the A3100 into and out of Godalming. It is considered that whilst the development would entail the relocation of the existing farm shop to a location alongside and south-west of Squires Garden Centre, the building and its car park would be largely concealed behind existing mature trees and a tall hedgerow. The site does not play a significant role as a gateway for Godalming on the A3100.

3.19 There are few or no views of the site from both the A283 and the built up areas of Milford to the south-west.

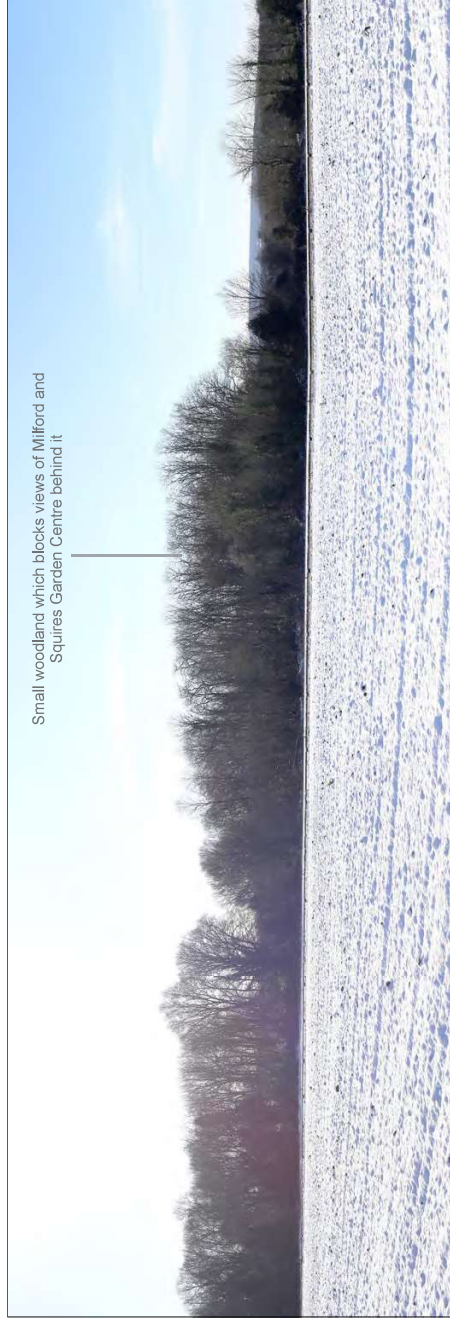
3.20 The removal of the site from the Green Belt would not impact upon the historic setting of Godalming. As noted in the LDA Design Report, the wooded character which is considered to form a principal trait and characteristic of the approach into Godalming, when approached along the A3100, begins north of Squires Garden Centre and this wooded approach would remain unaffected. In consideration of the above it is judged that the site makes a 'Limited Contribution to this purpose.

Purpose 5 – To assist urban regeneration, by encouraging the recycling of derelict and other urban land

3.21 This purpose was not considered in earlier LPP1 (Amec Report) and LPP2 (Wood Report) Green Belt reviews/assessments and is not considered in this report.



Viewpoint 3. Visitors to Eashing Cemetery are generally precluded from seeing both the horticultural fields and Milford beyond by the treed hedgerow around the cemetery.



Small woodland which blocks views of Milford and Squires Garden Centre behind it

Viewpoint 4. This view is considered slightly more representative of the view afforded the houses along Primrose Ridge. This shows the strong physical and visual barrier of the small woodland (to the left of view) in screening activities in the southern half of the Secretts Farm



The Lawson's Cypress Hedge which heavily filters views of the Milford and the proposed housing site



Viewpoint 5 – View looking from the A3100, Portsmouth Road, towards the proposed relocated farm shop site (the proposed housing would lie beyond this).

The Assessment of Visual & Physical Openness and Boundary Quality

- 3.23 The NPPF's introducing paragraph to 'Protecting Green Belt Land' notes:
"the essential characteristic of Green Belts are their openness and their permanence" (para 137).
- 3.24 The Planning Practice Guidance (July 2019) provides guidance on the determination of likely effects through consideration of physical and visual openness (Table 2.1) – see Table 2.1 taken from the Wood Report
- Recent case law taken from Samuel Smith Old Brewery v North Yorkshire County Council (case # 2020 UKSC3) has established that the primary objective of Green Belt policy is to prevent urban sprawl, while keeping land open, and the weight given to physical and visual openness is a matter of planning judgement.
- 3.25 For ease of comparison, this assessment uses the same Green Belt assessment methodology adopted in the Wood Report (2020) when assessing visual & physical openness and boundary quality. This is provided in Table 3.2 below, taken from the Wood Report (Figure 9).

Physical Openness

- 3.26 A notable proportion of the site is currently occupied by a range of greenhouses/polytunnels and their associated laydown areas and parking. As shown in the satellite photographs (Figure 13), the metal framed structures have been in place for more than 20 years; the associated hardstanding (paved) equates to approximately 2.4 hectares. These glasshouses and the main, larger, southern glasshouse, in particular, are agricultural in purpose. They are striking, large buildings which do not sit comfortably with what is ordinarily considered an open agricultural scene/character. In consideration of the above the site is judged to have a 'mixed sense/degree of Physical Openness'.

Visual Openness

- 3.27 The proposed site is physically and visually contained by existing urban form along its south-western and south-eastern edges. This urban form comprises houses off Chapel Lane to the south-west and the houses off the A3100, Portsmouth Road to the south-east. The site's north-eastern boundary is formed by a mature evergreen wind break of thujalypress trees which visually cuts off the site from the landscape to the north and east. The site's north-western boundary is (to the west of the proposed sports field) formed by Eashings Lane and its hedgerow.

- 3.28 There are no public footpaths within the site, albeit residents are allowed to walk the informal parkland area between the farm shop and Squires Garden Centre, which has a lockable, paved, access way connecting the agricultural land to the garden centre cafe and the Portsmouth Road. There are no views across the site from Chapel Lane to the south-west and from the A3100 Portsmouth Road to the south-east.

- 3.29 Given the site's visually and physically contained nature, it is considered to have a 'mixed' to 'low' degree of visual openness. The development would retain this contained nature. The existing evergreen windbreak would be managed and new planting introduced to reinforce and safeguard its longevity. A circa 18 metres wide tree belt would be introduced around the housing scheme's north-western boundary. Whilst the site would irreversibly change from an agricultural/horticultural operation to housing, the planting proposed would ensure that by Year 15 the visual openness of the surrounding landscape would not be harmed/affected.



Figure 13: Satellite Images 1999 & 2021



Table 2.1 Planning Practice Guidance July 2019: Impacts on Openness and Compensatory Improvements

What factors can be taken into account when considering the openness of the Green Belt?	How might plans set out ways in which the impact of removing land from the Green Belt can be offset by compensatory improvements?	How can the strategic policy-making authority ensure that compensatory improvements to the environmental quality and accessibility of the Green Belt will be secured?
<p>Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:</p> <ul style="list-style-type: none"> openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume; the duration of the development, and its reversibility – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and the degree of activity likely to be generated, such as traffic generation. 	<p>Where it has been demonstrated that it is necessary to release Green Belt land for development, strategic policy-making authorities should set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. These may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies, and could for instance include:</p> <ul style="list-style-type: none"> new or enhanced green infrastructure; woodland planting; landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal); improvements to biodiversity, habitat connectivity and natural capital; new or enhanced walking and cycle routes; and improved access to new, enhanced or existing recreational and playing field provision. 	<p>Identifying the scope for compensatory improvements is likely to require early engagement with landowners and other interest groups, once the areas of land necessary for release have been identified. Consideration will need to be given to:</p> <ul style="list-style-type: none"> land ownership, in relation to both land that is proposed to be released for development and that which may be most suitable for compensatory improvements for which contributions may be sought; the scope of works that would be needed to implement the identified improvements, such as new public rights of way, land remediation, natural capital enhancement or habitat creation and enhancement, and their implications for deliverability; the appropriate use of conditions, section 106 obligations and the Community Infrastructure Levy, to secure the improvements where possible. Section 106 agreements could be used to secure long-term maintenance of sites.

Quality of Boundaries

3.30 As noted by the Wood Report assessment of the Site 0923 (page A45), the site's boundary quality varies. The shortest, north-western boundary is formed by Eashing Lane and its roadside hedge. The road alongside and to the south-east of this road do not necessitate this part of the site being released from the Green Belt. The site's north-eastern boundary is formed by an existing evergreen windbreak of thuja/cypress trees. All of these boundaries are clearly defined and readily recognisable. The proposed development would introduce a robust circa 18 metres wide tree belt along its north-western edge and through a landscape management plan, the existing windbreak trees along the site's north-eastern boundary would be retained and managed (with additional planting) to ensure the longevity of this edge. In light of this it is considered that, in addition to there being clearly identifiable and robust edges, these will be permanent and as such the development would not in the long term encroach into the wider Green Belt and countryside.

Assessment of the Degree of Harm Associated with the Proposed Development of the Site

3.31 For ease of comparison, this report will adopt the same methodology for the assessment of harm as used in the Wood Report. Tables 3.3 and 3.4 are reproduced adjacent.

Table 3.3 Evaluation Template Relating to Site Development

Evaluation Question (adapted from: Calverton Parish Council v Nottingham City Council & Ors [2015] EWHC 1078 (Admin) (21 April 2015))	Assessment
What is the nature and extent of the harm to the Green Belt arising from site development?	Narrative stating the likely degree of harm to the Green Belt as: significant moderate or limited (and combinations thereof), reflecting the meeting of Green Belt purposes of the site and the strategic parcel(s) affected, the likely impact of development on the openness and permanence of the site and surrounding Green Belt, along with the consideration of traffic generation and the duration of development.
To what extent could the impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?	Narrative reflecting opportunities and proposals to employ measures such as landscaping to mitigate the immediate impacts of development on openness and permanence.
Can a Green Belt boundary around the site be defined clearly, using physical features that are readily recognisable, and likely to be permanent?	Narrative based on the site-specific context, reflecting existing boundary quality and openness.
If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of Green Belts, or would the Green Belt function be undermined by the site's development?	Narrative, reflecting the relationship of the site with its wider Green Belt context, including consideration of the likely effect on visual openness.
Overall Conclusions on the Likely Effects on the Green Belt of Site Development	Narrative based on the above assessment.

6. The likely degree of harm to the Green Belt arising from its development is summarised by a five-point scale and assessment criteria set out in Table 3.4, reflecting the application of professional judgement in the light of the likely effects of development on Green Belt purposes, its openness (visual and physical) and permanence (i.e. the quality of boundaries which currently contain development or might do so).

Table 3.4 Degree of Harm to the Green Belt arising from Development and Assessment Criteria

Degree of Harm to the Green Belt	Assessment Criteria
Significant	Clear adverse effects of development on physical and/or visual openness and permanence which is unlikely to be able to be successfully mitigated.
Moderate to Significant	Adverse effects of development on physical and/or visual openness and permanence with potential opportunities for mitigation.
Moderate	Mixed effects of development on physical and/or visual openness and permanence with opportunities for mitigation.
Moderate to Limited	Lesser effects of development on physical and/or visual openness or permanence, with clear opportunities for mitigation.
Limited	No discernible effect of development on physical and/or visual openness and permanence.

Evaluation Question: What is the nature and extent of the harm to the Green Belt arising from site development?

3.32 The introduction of residential development is a use identified as inappropriate within the Green Belt (NPPF Para 149), albeit notable parts of the proposed site are occupied by hardstandings and large metal framed glasshouses. These notable structures have been present for over 20 years and, as such, are considered permanent. These structures have a notable influence over the site's physical and visual openness. The introduction of development is consistent with the compact and nucleated form of Milford and would not significantly compromise the physical, visual or perceived gap between Milford and Godalming.

3.33 The redrafting/repositioning of the Green Belt boundary, and the introduction of the proposed housing, would utilise existing, strong boundaries and provide a new, strong boundary along the proposed housing site's north-western edge. Given the site's visually contained nature and that it plays little or no role in the gateway/arrival route into and out of the historic town of Godalming along the A3100 and the A286, the degree of harm to Green Belt purposes of Encroachment and the Setting of Historic Towns is considered 'Limited'. Given the above, and the influence of the existing structures and hardstanding over the physical and visual openness of the site, together with the existing strong, defensible boundaries with the ability to introduce and strengthen the site's shorter north-western edge, the introduction of the proposed development is judged to give rise to a 'Moderate to Limited' degree of harm on the surrounding Green Belt.

Evaluation Question: To what extent could the impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practical extent?

3.34 The proposed site is fortunate in that it is already physically and visually contained by a combination of built form and an evergreen tree belt along three of its four boundaries. The reinforcement of the existing tree belt and the introduction of a circa 18 metres wide belt of structure planting along the site's shortest, north-western edge, would ameliorate effects on the physical and visual openness of the surrounding Green Belt.

Evaluation Question: Can a Green Belt boundary around the site be outlined clearly, using physical features that are readily recognisable and likely to be permanent.

3.35 As noted above, the proposed housing site has clearly defined, readily recognisable, permanent and defensible boundaries along its south-western and south-eastern edges with the existing Milford village. The site's north-eastern boundary is formed by a physically and visually strong evergreen windbreak. The development proposals would safeguard and strengthen this edge. The site's north-western edge is formed by Eashing Lane. A grass sports pitch area (unit)

is proposed on the land between Eashing Lane and the proposed housing site. A circa 18 metres wide belt of structure planting is proposed between the housing site and the sports ground.

3.36 In light of the above, it is considered that the proposed housing site would have clear, strong and defensible boundaries, which would greatly limit any impacts on the visual openness of the surrounding Green Belt.

Evaluation Question: If this site were to be developed would the adjacent Green Belt continue to serve at least one of the five purposes of the Green Belt, or would the Green Belt function be undermined by the site's development?

3.37 This report's earlier assessment of the anticipated/predicted effects on the adjoining Green Belt were:

3.38 **Purpose 1 – Sprawl:** Sitting alongside and between two existing urban edges it is considered that, the proposed development would complement, and be consistent with Milford's existing compact and nucleated form.

3.39 **Purpose 2 – Coalescence:** Whilst the introduction of the development would see a minor reduction in the gap between Milford and Ockford Ridge (reduced by approximately 220 metres, retaining a gap of approx. 550m to 900m), the existing windbreaks and woodland area would mean the introduction of development would not impact upon the visual gap between the two settlements. There would be no change in the perception of the gap from Ockford Ridge or as experienced along the A3100 and the urban form along it.

3.40 **Purpose 3 – Encroachment:** The introduction of the proposed housing development would retain and reinforce the evergreen tree belt and would provide a circa 18 metres wide structure belt along the site's remaining north-western edge. The proposed provision/introduction of sports pitches as part of the development is consistent with appropriate development identified in the NPPF Para 149 (b) and Para 145 which encourages local planning authorities to plan to positively enhance access, nature conservation and outdoor sports provision. The proposed housing site would sit alongside the existing urban edge with clearly defined, readily recognisable and permanent boundaries.

3.41 The development proposals would safeguard the visually strong evergreen windbreak and the development would provide a circa 18 metres wide robust tree belt along its north-western edge. Whilst the development would change the physical and visual openness of the site, the existing windbreak and the proposed reinforcement planting would ensure that, in time, the housing development would not encroach into the visual openness of the Green Belt.

3.42 **Purpose 4 – Setting of Historic Towns:** The site is fortunate in that it is visually well contained by existing adjacent urban form and tree belts both around the site and within the surrounding landscape. There are no public rights of way within or within close proximity to the site. The proposed housing would be largely concealed from public viewpoints along the A3100 Portsmouth Road to the south-east and housing off Chapel Lane to the south-west. Whilst the development would entail the relocation of the existing Secretts Farm (shopp?), its new proposed location between Squires Garden Centre and existing houses, set back from the A3100 is not considered prominent. The proposed housing development would make little or no contribution to the arrival and departure sequence of views along the A3100 between Milford and Godalming.

3.43 In conclusion of the above it is judged that the introduction of the proposed development would have 'Moderate to Limited' harm on the purposes of the Green Belt.

4.0 Summary

- 4.1 Ptarmigan Land and Belway Homes Ltd are in the latter stages of preparing a planning application for circa. 220 dwellings, a replacement farm shop, a doctor's surgery, a flexible office space and new sports pitches on land at Secretts Farm, Milford. The emerging WBC Local Plan Part 2 proposes to remove the Secretts Farm site from the Metropolitan Green Belt as part of the WBC Policy DS14 – 'Land at Secretts'.
- 4.2 The adopted Waverly Borough Council Local Plan Part 1 (LPP1) removed Milford from the Green Belt and identified a number of broad areas of search around Milford and Witley to accommodate 480 homes in the plan period. The broad areas of search around Milford were to the north and west (see Figure 6).
- 4.3 The LPP1 was, in part, supported by the Amec Green Belt Review (Parts 1 and 2) dated August 2014. In the preparation of the LLP2, WBC reviewed a number of representations questioning the appropriateness of these broad areas of search. A notable element of these representations related to the fact that the areas of search were located in the Surrey Hills AONB while other sites outside the AONB were available.
- 4.4 Strong representations were made by the Surrey Hills AONB who confirmed they had a, "major AONB issue with regard to the 220 dwellings proposed in the AONB at Milford".
- The AONB representations noted that with regard to the Council's own landscape character assessment and other work, their judgement was, "the 4 AONB sites have not been shown to be any more suitable for housing than the Secretts site, rather the reverse."
- 4.5 It is understood representations also included a number from Witley Parish, who were in the process of preparing their Neighbourhood Plan and they noted they favoured the Secretts Farm site. Ptarmigan also submitted representations and submitted to WBC a Green Belt and Landscape Appraisal undertaken by LDA Design in support of the Secretts Farm site. This report concluded the Secretts site made a 'limited contribution' to all four Green Belt purposes being considered and, in light of this work and the supporting landscape and visual appraisal, concluded the release of the site and the introduction of development on it would not harm the designation. (Para 6.17, Page 34).
- 4.6 The consideration of the AONB is significant to the EIP given the NPPF (2021) makes it clear in Para 176 that, "Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas."
- 4.7 In the preparation of WBC LPP2, the council commissioned Wood (Environment and Infrastructure Solutions UK Ltd to propose the Green Belt Site Appraisals: Milford, Witley and Wormley (August 2020) which led to the WBC Green Belt Settlement Boundary Review Topic Paper (November 2020). The Wood Report builds on the 2014 Amec Green Belt Review, but is also differs from it in two ways:
1. It considered the Green Belt impacts on a site by site basis (24 potential sites— rather than the larger 'segments' used in the AMEC 2014 Review)
 2. The site assessments considers
 - a) The contribution the sites make to the Green Belt, and
 - b) It provided an assessment on the degree of harm which would be brought about by development on each site.
- 4.8 The Wood Report identified the Secretts Farm site in a shortlist of six sites where the study concluded that the potential harm to the Green Belt was either 'Limited' or 'Moderate to Limited'. Development on the Secretts Farm site was considered to give rise to 'Moderate to Limited' harm to the Green Belt.
- 4.9 The Waverly Neighbourhood Plan was 'made' in June 2021. The Plan Policies – Locations for Future Growth notes that the Secretts Farm site, "would have the benefit of delivering in full the remaining LPP1 housing requirement, whilst also potentially providing, but not limited to, a new village park which would act as a SANG, space for new shops (including a new Secretts Farm Shop and Café), space for other community facilities such as new sports facilities and a rural business centre" (para 4.4, Page 18).
- 4.10 With the benefit of the planning application detail proposals, this report has undertaken an updated assessment for the assessment of Green Belt purposes, a judgement of the development's influence on physical and visual openness and, in conclusion, a judgement on the potential harm to the remaining Green Belt. This report adopts the same methodology (and assessment scales) as both the Amec Review (2014) and the LDA Design Report (2016).

4.11 With regard to Purpose 1 – Sprawl, this assessment concludes that the site make a 'Limited Contribution' to checking unrestricted sprawl and the proposed development would not result in unrestricted sprawl. The proposed housing site relates well to the surrounding urban context with urban form along the A3100 and off Chapel Lane providing strong context. The introduction of development would be consistent with the compact and nucleated form of the village.

4.12 With regard to Purpose 2 – Coalescence, this assessment concludes that the site makes a 'Limited Contribution' to the preventing of the merging of Godalming and Milford. The introduction of development would result in a modest 220-420 metre reduction in the 810-1160 metre gap between Milford and Ockford Ridge to the north-west. Given the intervening windbreaks and woodland within this gap the residents at Ockford Ridge (private views) would see little or no change in their setting and views. The site plays little or no visual role as experienced by motorists travelling along the A3100 between Milford and Godalming.

4.13 With Regard to Purpose 3 – Encroachment, this assessment concludes that the site makes a 'Limited Contribution' to safeguarding the countryside from encroachment and the proposed development would reinforce visual containment/physical boundaries and introduce sports pitches and a SANG which would contain development to the north-west, both of which are provided for and encouraged within the NPPF (para 142 and 145).

4.14 With regards to Purpose 4 – The setting of Historic Towns, the assessment concludes that the site and the proposed development would make a 'Limited Contribution' to the historic setting of Godalming. For motorists travelling to and from Godalming along the A3000 Portsmouth Road it is envisaged that the roofscape of the proposed development would only be glimpsed above the intervening built form. The wooded approach to Godalming, a characteristic which commences to the north east of the site, would not be affected.

Physical and Visual Openness and Boundary Quality.

4.15 In physical terms the site is currently occupied by the Secretis intensive horticultural and glasshouse farming activities, a use identified as appropriate within the NPPF (para 149). Whilst agricultural, and therefore appropriate, the operations include a number of large, metal framed structures with approximately 1 hectare of supporting paved laydown and extended storage areas, which have been in place for over 20 years, i.e. they are not considered to be temporary structures and these uses/buildings do influence the physical and visual openness of the site. In visual terms, the site is fortunate in that it is strongly contained physically and visually on three of its four sides, by urban form and along the south-western and south-eastern edge, and a tall mature evergreen windbreak on the north-eastern edge. With regards to the wider Green Belt to the north-east, there

are several additional inter-lying mature evergreen windbreaks and a woodland separating the site from Ockford Ridge, approximately 550-900 metres to the north-east. The proposed development would sit alongside existing urban areas and retain and reinforce the existing windbreak and introduce a circa 18 metres wide belt of structure planting along the proposed housing site's north-western boundary. In addition, the proposed sports ground and SANG would provide further separation for the Green Belt to the north-west. The potential for the proposed development to contribute to the physical and visual openness of the adjoining Green Belt is considered low and the proposals could bring forward clearly identifiable, robust and defensible substantial boundaries.

Nature and harm to the Green Belt

4.16 In light of this report's analysis of the site, it is judged that the site can be developed without unduly compromising the Purposes of the Green Belt and resulting in unacceptable harm to the designation. The release of the Green Belt and the introduction of the development proposals (shortly to be submitted to WBC) would provide robust, clearly identifiable, permanent and defensible Green Belt boundaries to be drawn around the proposed development and the new northern edge of Milford. The development would be consistent with the NPPF (Para 145) in that it would bring forward the provision of sports pitches and a SANG which would positively enhance the visual amenity, biodiversity and sports and informal recreational activities, whilst also providing a defensible western edge to the proposed housing site. It is considered that the release of the site would not compromise the surrounding Green Belt purposes or significantly harm the designation.



APPENDIX 2 - COUNSEL OPINION FROM SASHA WHITE QC

**PTARMIGAN LAND LIMITED
LAND AT SECRETTS OF MILFORD, HURST FARM, MILFORD**

ADVICE

1. I am instructed by Indigo Planning who are in turn instructed by Ptarmigan Land Limited in relation to land at Secretts of Milford, Hurst Farm, Milford, Surrey [“The site”] which lies within the administrative area of Waverley Borough Council [“The LPA”].
2. I should advise those who instruct me that I am very familiar with Waverley having been instructed in 8 different housing sites in the past 3 years in the borough.
3. The site comprises 15.4 hectares of land adjacent to the northern edge of Milford and the site lies almost entirely within the Green Belt. Some of the land is in agricultural use but a significant amount is PDL which is estimated to amount to 5.436 hectares.
4. Ptarmigan have been promoting the site for residential development since 2016.
5. In terms of the Emerging Waverley local plan 2017 [“EWLP”] and the emerging Witley NP [“WNP”] the following key points are of note:
 - 5.1. AHL 1 identifies Witley (including Milford) to provide 480 units over the plan period.
 - 5.2. One strategic site to meet that need for Witley is identified at Milford Golf Club with an estimated contribution of 180 units.
 - 5.3. Policy SP 2 allows moderate levels of development for the larger villages of which Milford and Witley are identified.
 - 5.4. The LPA intend to bring forward non-strategic sites for housing through Local Plan Part II [“LPP2”]
 - 5.5. Witley PC has indicated that it wishes to allocate its own sites in the NP.
 - 5.6. It has done significant work to find its own sites including a survey undertaken in July 2017.
 - 5.7. There was broad support for the allocation of Secretts for 200 new homes and Milford Golf Course was considered a bad choice by many.
 - 5.8. However in a meeting with LPA offices in November 2017 the LPA indicated that they would not support sites which do not benefit from an asterisk on Plan 5 in the LPP Part 1.
6. The fundamental question I am asked to address is whether the Witley PC need to follow the advice of officers of the LPA and restrict their housing sites to those which benefit from an asterisk on Plan 5 of LPP 1 or is it open to them to identify their own sites.
7. I am strongly of the view that the PC have discretion in both law and policy to choose their own sites for the following reasons:
 - 7.1. Policy SP 2 notes that additional sites will be identified and allocated through LPP Part 2 and neighbourhood plans.
 - 7.2. Delivery of SP 2 is said to be also by neighbourhood plans.
 - 7.3. Table 6.1 expressly seeks under row J that housing will come forward from suitable LAA sites and allocations in LPP2 and NPs.
 - 7.4. Policy ALH 1 allocates 480 units to Witley and Milford and delivery is again said to include NPs.
 - 7.5. Policy RE 2 makes clear that LPP 2 can make detailed adjustments to the GB boundaries around “..Milford and Witley” following “consultation with local communities”.
 - 7.6. The EIP Inspector [paragraph 74] notes that the precise boundaries around Milford will be defined in LPP Part II.
 - 7.7. I therefore note that the LPP1 clearly gives within its policy framework a discretion for further housing to come forward either within Part II or a NP for the Witley/Milford area.
 - 7.8. I cannot see any basis for it being contended that the WNP cannot allocate additional sites including those not identified in Plan 5 of LPP Part I.
8. If there are any queries do not hesitate to contact me in Chambers.

7 February 2018.

**SASHA WHITE Q.C.
LANDMARK CHAMBERS.**



**APPENDIX 3 – SURREY HILLS AONB BOARD
REPRESENTATION TO LPP2 6 JULY 2018**

WAVERLEY LOCAL PLAN PART 2 – SITE ALLOCATIONS AND DEVELOPMENT MANAGEMENT POLICIES PREFERRED OPTIONS CONSULTATION.

RESPONSE OF THE SURREY HILLS AONB PLANNING ADVISER ON BEHALF OF THE SURREY HILLS AONB BOARD

This Local Plan has been prepared within the framework set by the Waverley Local Plan Part 1. From an AONB aspect this includes the adoption of Policy RE3: Landscape Character and Policy ALH1: The Amount and Location of Housing setting out the numerical distribution of housing across the Borough. Those two policies cannot be questioned in this submission. The only proviso is if the current legal challenges to the Plan are successful there would need to be a further consultation on any proposed changes.

1. Framework set by Local Plan Part 1.

Local Plan Part 1 made no strategic housing allocations as such in the AONB. However, Policy ALH1 set out a distribution of housing that either in some parts of the Borough necessitated Local Plan Part 2 to allocate housing sites in the AONB as they are wholly within the AONB, such as Chiddingfold and Elstead, or where, as in Haslemere, there is little real option but to allocate some housing in the AONB/AGLV to meet such a high housing allocation.

The other smaller AONB settlements (Churt, Frensham, Tilford and possibly, Bramley, Wonersh and Shamley Green) have relatively little housing allocations within Policy ALH1. Further, Waverley Officers have advised that most of those housing allocations have already been permitted. Consequently, this submission does not comment upon those smaller settlements any further. There is a major AONB issue with regard to the 220 dwellings proposed in the AONB at Milford.

The policy context set by Part 1 for consideration of these housing proposals in Part 2 is Policy RE3 which states:

“The protection and enhancement of the character and qualities of the Surrey Hills Area of Outstanding Natural Beauty (AONB) that is of national importance will be a priority and will include the application of national planning policies together with the Surrey Hills AONB Management Plan”.

This indicates there is a strong policy restriction for allocating in Part 2 housing sites within the AONB, particularly in Haslemere and Milford. This is supported by the Local Plan Inspector’s own conclusions set out in paragraph 36 of his report where he stated the following:

“The strategic site allocations in this plan do not have a significant effect on valued landscapes or important biodiversity habitats. Whilst it will be necessary to allocate further greenfield sites in Local Plan Part 2, the plan contains a range of strong landscape and environmental protection policies – discussed later in this report under the section on development management policies – which are capable of ensuring that valued landscapes, including AONB, AGLV and other designations, are protected”.

The above conclusion of the Inspector came in his section seeking to balance the Plan's housing provision with environmental issues. Consequently, he concluded in that paragraph there is no conflict between meeting the Plan's housing provision with protecting the AONB and also the AGLV. Either he misunderstood the consequences of the distribution of housing in Policy ALH1 would have on the AONB because the Local Plan did not explicitly set that out, or this Local Plan Part 2 does not accord with his expectation that the AONB would be protected from housing allocations. The implications of development on the AONB was made worse by the Inspector's requirement that Waverley take half of Woking's unmet housing needs which resulted in further housing being proposed in the AONB in the final modifications. That is considered to be an unsatisfactory approach to treating the Surrey Hills AONB within both local plans. There is an underlying concern that too little weight has been given to the conserving the landscape and scenic beauty of the Surrey Hills AONB which is one the Borough's greatest assets. The local plan consultation on Local Plan Part 1 showed that of all the planning considerations affecting the Borough respondents considered that the protection of the AONB from development was the top priority of them all.

This submission therefore seeks to question the justification for the inclusion of some AONB housing sites, notably in Milford, and revisions to the Plan to include the remaining AONB housing sites as reserve housing sites and sufficient landscape mitigation and compensatory measures.

2. Housing allocations in Local Plan Part 2 affecting the AONB.

2.1 Haslemere.

Part 1 Local Plan allocated a minimum of 990 dwellings at Haslemere.

The Council has already permitted 135 dwellings within the AONB at Sturt Farm.

Local Plan Part 2 proposes 21 dwellings on site DS13 on land north of Haslemere Saw Mills, Sturt Road that is wholly within the AONB

The Plan also proposes on sites partly within the AONB and partly AGLV:

- 30 dwellings on site DS10 on land east of Longdene House, Hedgehog Lane
- 25 dwellings on site DS15 , Longdene Field,

The total of the 3 sites being 76 dwellings (211 dwellings if Sturt Farm is included).

It further proposes in the AGLV:

- 50 dwellings at Red Court, Scotland Lane on site DS18 which is a candidate for inclusion in the AONB and,
- 20 or 25 dwellings (both figures quoted in Appendix III) on site DS 11 land SE of Haslemere Water Treatment Works,

totalling a further 70 or 75 dwellings.

The scale of housing affecting Haslemere's AONB proposed in the Plan amounts to about 146 dwellings which does not seem to equate with the Inspector's expectation in his paragraph 36 that the AONB and AGLV would be protected from development in Local Plan Part 2 by strong protection policies. If the 135 dwellings permitted at Sturt Farm are included 281 dwellings are proposed on green field AONB sites adjoining Haslemere.

No Landscape and Visual Impact Assessment (LVIA) has been carried out for any of the housing land allocations in the AONB. Even if that is not a Government requirement the omission of an

LVIA and reliance upon a broader based Landscape Character Report of larger parcels of land suggests a possible lack of regard the Council has attached to the Government and its own policies for conserving the landscape and scenic beauty of the AONB. The Sustainability Appraisal is also inadequate and questionable in its assessment in places.

The reference in the supporting text to the housing allocations to ensuring the conservation of the landscape and scenic beauty of the AONB be informed by an LVIA illustrates the seeming lack of appreciation of the landscape significance of the proposals and the purpose of LVIAs. This is because once the principle of a certain minimum number of dwellings for a protected landscape site has been allocated in an adopted local plan, the LVIA comes too late. The subsequent LVIA cannot then conclude that housing development on a site would conserve its landscape and scenic beauty. It can only inform ways of mitigating its landscape impact. The evidence base for the inclusion of these sites is therefore open to the criticism of being inadequate.

The above sites set out at the box in paragraph 4.32 are assessed individually below in numerical order.

DS10 land east of Longdene House.

In the Council's Landscape Character Report prepared by Amec the site falls within Segment HE06. Whilst the Analysis of Capacity states at the last bullet point that there could be potential for development in the fields where permission has already been granted for 135 dwellings it states:

"The remainder of the segment to the south of the footpath is visually more detached from the settlement and development would be more likely to have a negative impact on the landscape".

This site DS10 comes within this segment where the Council's own Landscape Character Report states its development would have a negative impact on the landscape. It also happens to be in the AONB and AGLV.

That part of the site only within the AGLV is an anomaly as it is the same landscape as the adjoining AONB landscape without any distinguishing differences between the two. Furthermore, the ill defined boundary between the two crosses the middle of a field. This illustrates the need for the Surrey Hills AONB Boundary Review to be progressed soon. The Hankinson Duckett Landscape Character Assessment commissioned to inform Natural England's decision to review the boundaries of the Surrey Hills AONB identified this site as an AONB candidate area recommended for inclusion in the AONB. The assessment concluded this part of the AGLV appeared as an anomaly to the AONB boundary surrounding Haslemere.

The site comprises two fields of about equal size divided by a thin line of trees. The site is particularly sensitive in landscape terms being on a hill. The woodland to the south falls away quite steeply and therefore would unlikely block views of houses above it from the AONB and National Park to the south. One of the current attributes of Haslemere is that the built up area features little, if at all, in these AONB and National Park views.

Development within the AGLV part of the site could not fail to spoil the setting of the adjoining AONB also within the site, to the south and possibly also the National Park beyond. That would be in conflict with national Planning Practice Guidance on Natural Environment – Landscape paragraph 3, also Local Plan Part 1 Policy RE 3 protecting the setting of the AONB and Surrey Hills AONB Management Plan Policy LU5.

Appendix III states that the site is suitable for a low density development of around 30 dwellings. At 2 ha the density would be about 6 dwellings per acre (dpa). This estimate may have been

influenced by the low density of neighbouring housing to the east. However, protected landscapes should not be sacrificed to provide low density market housing that does not meet the need for smaller and more affordable housing. This is a further reason to support the unsuitability of this proposed housing allocation.

DS11 land south east of Haslemere Water Treatment Works, Sturt Road.

The Council's Landscape Character Report concluded that the development of this site which is within segment HE06 would likely have a negative impact on the landscape. Whilst the Analysis of Capacity states at the last bullet point that there could be potential for development in the fields where permission has already been granted for 135 dwellings it states:

"The remainder of the segment to the south of the footpath is visually more detached from the settlement and development would be more likely to have a negative impact on the landscape".

The site would be difficult to develop satisfactorily because of the levels. The estimate of 25 dwellings may therefore be optimistic. Any buildings behind the high retaining wall would dominate Sturt Lane and have a seriously detrimental public visual impact and adversely change the character of the locality. Additionally it would be overbearing on the occupiers of the modest houses opposite and close to the road. Excavation of the site to reduce the levels to nearer those of Sturt Lane would be considerable necessitating a very high retaining wall to the rear and interference with the natural contours of this protected landscape.

The site lies within the AGLV but forms part of the same landscape as the adjacent AONB and the two in landscape terms cannot be differentiated. The 2002 Waverley Local Plan designated it as "AGLV treated as being within the Surrey Hills AONB". The Hankinson Duckett Landscape Character Assessment commissioned to inform Natural England's decision to review the boundaries of the Surrey Hills AONB identified it as an AONB candidate area recommended for inclusion in the AONB. The assessment concluded this part of the AGLV appeared as an anomaly to the AONB boundary surrounding Haslemere.

Its development would clearly have a strong impact on the setting of the adjacent AONB spoiling views both into and from the adjacent AONB. That would be in conflict with national Planning Practice Guidance on Natural Environment – Landscape paragraph 3, also Local Plan Part 1 Policy RE 3 protecting the setting of the AONB and Surrey Hills AONB Management Plan Policy LU5.

DS 13 land north of Haslemere Saw Mills, Sturt Lane.

In the Council's Landscape Character Report prepared by Amec the site falls within Segment HE06. Whilst the Analysis of Capacity states at the last bullet point that there could be potential for development in the fields where permission has already been granted for 135 dwellings it states:

"The remainder of the segment to the south of the footpath is visually more detached from the settlement and development would be more likely to have a negative impact on the landscape".

The description of the site in Appendix III is that its relationship with existing development along Sturt Road and limited prominence means that it is likely to be able to accommodate around 21 dwellings without significant landscape impact. This description is considered to be misleading.

The site is a publicly prominent open area of rising ground within the AONB forming part of the wider AONB landscape behind and above and the National Park close by to the south. The Plan and Sustainability Appraisal do not recognise that the site is within the AONB. The 2002 Waverley Local Plan Proposals Map seems to show it to be within the AONB and the strip of

land to the north as AGLV treated as being within the Surrey Hills AONB. This would accord with the original 1958 Surrey Hills AONB designation map held in this Office.

The relatively isolated business premises to the south east are not readily seen in association with the site. As the site rises above Sturt Lane and its junction with Camelsdale Road and Bell Road housing development would have a significant visual impact from public viewpoints detrimentally affecting the character of the locality. Little, if anything, could be done to mitigate the impact of the proposed development on the AONB by way of planting as the SA suggests..

DS 15 Longdene Field.

The development of this site and adjoining property with 29 dwellings has been allowed on appeal. The Council are understood to have appealed the decision to the High Court. A second identical application for 29 dwellings (WA/2018/0151) has yet to be determined.

In allowing the appeal the Inspector commented as follows:

“However, the Council is overriding the AONB designation elsewhere in the district in an attempt to meet housing need as was the case at Sturt Farm. Indeed, some 272 dwellings are proposed in the LP Part 2, and in the LAA, on sites in the AONB”.

In application WA/2018/0151 the appellants state at paragraph 7.102 of the Planning Statement that the LAA provides for a total of 521 dwellings over the first 10 years of the Plan on 18 AONB sites.

The following is only relevant should the Council’s legal challenge to the appeal decision and any further legal challenges by the appellants be successful.

Like DS 10 part of this site falls within the AONB and part within the AGLV.

In the Council’s Landscape Character Report prepared by Amec the site falls within Segment HE06. Whilst the Analysis of Capacity states at the last bullet point that there could be potential for development in the fields where permission has already been granted for 135 dwellings it states:

“The remainder of the segment to the south of the footpath is visually more detached from the settlement and development would be more likely to have a negative impact on the landscape”.

This site DS10 comes within this segment where the Council’s own Landscape Character Report states its development would have a negative impact on the landscape.

That part of the site only within the AGLV is an anomaly as it is the same landscape as the adjacent AONB and the two in landscape terms cannot be differentiated. This illustrates the need for the Surrey Hills AONB Boundary Review to be carried out soon. The Hankinson Duckett Landscape Character Assessment commissioned to inform Natural England’s decision to review the boundaries of the Surrey Hills AONB identified it as an AONB candidate area recommended for inclusion in the AONB. The assessment concluded this part of the AGLV appeared as an anomaly to the AONB boundary surrounding Haslemere.

Unlike DS 10 its development would not impact upon AONB and NP views from the south.

The estimate of 25 dwellings seems to have been based upon the scheme allowed on appeal which comprised all detached houses. Protected landscapes should not be sacrificed to provide low density market housing that does not meet the need for smaller and more affordable housing. This is a further reason to support the unsuitability of this proposed housing allocation.

DS18 Red Court, Scotland Lane, Haslemere.

In the Council's Landscape Character Report the site falls within segment HE05A where the conclusion is that the development of this site would likely have a negative impact on the landscape due to the topography and access to the area. It is currently outside the AONB but within the AGLV. In the 2002 Waverley Local Plan it is designated as being "AGLV treated as being within the Surrey Hills AONB".

This part of the AGLV is an anomaly as it is part of the same AONB landscape and NP landscape to the south. . This illustrates the need for the Surrey Hills AONB Boundary Review to be carried out soon. The Hankinson Duckett Landscape Character Assessment commissioned to inform Natural England's decision to review the boundaries of the Surrey Hills AONB identified it as an AONB candidate area recommended for inclusion in the AONB. The assessment concluded this part of the AGLV appeared as an anomaly to the AONB boundary surrounding Haslemere.

It comprises attractive woodland and two or three more open areas. The site rises from Scotland Lane and therefore unless there is a wide and dense tree and shrubbery belt outside residential curtilages, buildings would have a significant public visual impact and spoil the pleasant character of this length of Scotland Lane. But then that tree and shrubbery belt would itself physically and visually detach the proposed 50 dwellings from the built up area of Haslemere and consequently unsatisfactorily relate more to the protected landscape to the south.

Whereas Scotland Lane currently forms a clearly defined boundary to the built up area of Haslemere, the proposed seemingly arbitrary and ill defined southern boundary would not.

The estimate of 50 dwellings on the site of 5.5ha would result in a low residential density of just under 4 dwellings per acre. If this housing allocation were to remain in the Local Plan a developer would expect and argue for more dwellings. In order to avoid an overprovision of housing and if notwithstanding the protected landscape concerns of any development of the site, its extent should either be reduced or the Plan should stipulate the maximum developable acreage including private gardens with the remainder being kept in perpetuity as amenity land containing native trees.

Protected landscapes should not be sacrificed to provide low density market housing that does not meet the need for smaller and more affordable housing. This is a further reason to support the unsuitability of this proposed housing allocation.

One of the current attributes of Haslemere is that the built up area features little, if at all, in these AONB and National Park views. Consequently, development of this part of the AGLV would likely spoil the setting of the nearby AONB and possibly the National Park beyond. That would be in conflict with national Planning Practice Guidance on Natural Environment – Landscape paragraph 3, also Local Plan Part 1 Policy RE 3 protecting the setting of the AONB and Surrey Hills AONB Management Plan Policy LU5.

2.2 Milford.

Under Policy ALH1 Milford comes within Witley that is allocated for 480 dwellings. 4 sites identified as potential Green Belt releases in Local Plan Part 1 are proposed to accommodate a total of 220 dwellings. Little recognition is given to them being within the AONB.

The sites come within segment MO4 in the Council's Landscape Character Report. The assessment concludes that the segment has

- some landscape qualities, (surprising as it is all within a nationally designated landscape),
- medium contribution to settlement setting,
- low visual prominence, (which is questionable),
- low inter-visibility,
- moderate landscape sensitivity and medium landscape value (the two of which are again surprising considering the segment is within a nationally designated AONB).

NPPF paragraph 115 states that AONBs and NPs have the highest status of protection in relation to landscape and scenic beauty. Further that great weight should be given to conserving their landscape and scenic beauty. Consequently, it is considered that this assessment could be questioned as not forming a proper evidence base for the proposals. On this questionable basis the assessment goes on to state that there could be some potential for development in the area contained by the A3 and the existing settlement boundary.

Before assessing each site listed under paragraph 4.45 in turn below the following are general points relating to them all.

It seems the Council has identified land between the old and new A3 for potential development partly as it is contained by these two roads, development would have local and not a wider impact on protected landscapes and some of it is considered to have relatively little intrinsic landscape or scenic beauty. But those reasons, except for the first, could apply to many parts of the Surrey Hills AONB and parts of other AONBs in the country. If that is the case, the reasoning is dangerous as it could also be applied elsewhere. The reasoning seems to misunderstand the purpose of AONB designation and were it to be accepted could be repeated many times elsewhere cumulatively having a greater effect and undermining the role, integrity and public benefit of AONB designation.

An Appeal Inspector has already sought to justify allowing an appeal for 29 dwellings affecting the AONB at Longdene House, Haslemere on the grounds that the Council is overriding the AONB designation elsewhere in the district in an attempt to meet housing need. The appellants referred to these sites at Milford in their case.

Further, that reasoning could apply to other land between to the new and old A3, such as between the new A3 and Amberley Lane which is developed in part. A tree belt would separate it from the new A3 that is in cutting. There is also land between site DS27 and Lower Mousehill Lane and south west of Site DS31. In my view, allocating this land, and for as many as 220 dwellings, is misconceived and would likely lead to a wider deterioration in the landscape quality, beyond these allocated sites, in time.

The merits of the 4 AONB sites in Milford versus the Secretts site.

The AONB should desirably only be considered for development to meet objectively assessed housing needs as a last resort when all other possibilities have been exhausted. The public consultation on the Witley Neighbourhood Plan sought public views on these possible AONB

sites at Milford and several alternative housing sites outside the AONB the most notable of which is the Secretts site where developers consider about 200 dwellings could be satisfactorily built.

Out of 24 sites canvassed 46% respondents considered Coneycroft (Site DS 30) a good choice and second came the Secretts site with 40%. By combining respondents' first and second (where there some concerns) choices the results were reversed with Secretts having 66% of the vote and Coneycroft 56%. Whether respondents were informed that the 4 AONB sites subject of this Council's consultation are designated AONB is not known. Nor is it known had that been the case whether the AONB sites would have scored even less well.

It is understood that those preparing the Neighbourhood Plan preferred the Secretts site to the AONB sites. However, they were informed by the Council that the AONB sites had to be adhered to as they were indicated in Local Plan Part 1. Consequently, the Neighbourhood Plan is no longer to include the consideration of housing sites which is being left for this Local Plan Part 2.

The AONB sites were only shown diagrammatically by asterisks in Local Plan Part 1 as "potential releases from the Green Belt" and their AONB designation was not made clear albeit it could be found with further reading. Their boundaries or extent were not shown. No evidence exists in the Local Plan Inspector's report that he ever considered them because they were not firm housing allocations, he had too little information to make a proper assessment of them and he knew they were to be considered later in Local Plan Part 2. Thus they were not firm proposals. He did though consider the relative merits for housing of the Secretts site with part of Milford Golf Course. He favoured the Milford Golf course site because it was closer to Milford Railway Station and was considered not to meet Green Belt purposes as well as the Secretts site. He did not consider the relative merits of the 4 AONB sites for about 220 dwellings with 200 dwellings at Secretts.

The status of the 4 AONB sites indicated diagrammatically by asterisks in Local Plan Part 1 do not therefore seem to bind the Council to consider only those sites to the exclusion of possibly any more suitable alternatives in the locality should they come forward. The exclusion in Part 2 of the other asterisk housing site shown in Part 1, at Witley outside the AONB, tends to support this approach.

The Green Belt Study showed the large stretch of Green Belt between Milford and Godalming and containing the Secretts site at one end as making a significant contribution to Green Belt purposes while the AONB land between the old and new A3 as making only a contribution to Green Belt purposes. But the Secretts site forms just a small part of the wider (C17) Green Belt segment. Moreover, its openness is compromised by the existence of large glass houses, extensive roads, outside storage areas and hardstanding. The contribution it makes in itself to Green Belt purposes would seem to be limited and may have been given too much weight in the preparation of this Plan or its availability for development came late in the process of identifying housing sites. The Council appears to be entrenched in its view that only the 4 original AONB sites should be developed for housing to the exclusion of considering any alternatives coming forward.

In my judgement, the 4 AONB sites have not been shown to be any more suitable for housing than the Secretts site, rather the reverse. The AONB sites are separated from most of Milford by the old A3 are not located adjacent to its centre, as is the Secretts site, and are a greater distance from Milford Railway Station. In short they are not as sustainably located as the Secretts site. The Secretts site is visually less attractive than the 4 AONB sites. Further, draft proposals for the development of the Secretts site have the benefit of proposing a SANG with extensive public access and landscape enhancements.

DS27 – Land at Mousehill Mead, Milford.

The site comprises some woodland and small fields interspersed with trees. A line of trees run along the boundary with the old A3. Landscape views from the old A3 into the site are largely screened by harsh looking fencing. The woodland itself has a valuable amenity role and most of the trees would be lost to development. I consider that the interplay between the individual trees, grassland and woodland to be an attractive landscape composition worthy of protection in its own right. Any detractors are temporary features.

30 dwellings are proposed on the site of 2.7ha which amounts to a low density of between 4 and 5 dwellings per acre. If this housing allocation were to remain in the Local Plan a developer would expect and argue for more dwellings. Protected landscapes should not be sacrificed to provide low density market housing that does not meet the need for smaller and more affordable housing. This is a further reason to support the unsuitability of this proposed housing allocation. If notwithstanding the AONB concerns the Council continues to include this site for housing it may therefore wish either to reduce its extent or stipulate that significant treed areas and belts should remain outside the gardens of new houses for public amenity purposes.

DS29 – Land at Manor Lodge, Milford.

The site description refers to it being surrounded by residential dwellings. That is not the case as beyond its main north-west and south boundaries is open undeveloped land. If sites DS31 and DS27 were developed then it would largely be surrounded by dwellings except for part of the area to the south.

The land is flat, well treed and with some undergrowth. Besides its AONB designation it has an intrinsic value of being green, undeveloped and providing an attractive setting for housing to the north east on the other side of Old Elstead Road. The site forms a suitable transition between Milford and the wider landscape beyond. It does not give the appearance of being an obvious development site but may do if the neighbouring open field, site DS31, were to be developed.

30 dwellings are proposed on a site of 1.7ha which amounts to about 7 dwellings per acre which is still low. If allocated for housing a developer would expect to be granted permission for more dwellings.

DS 30 – Land at Coneycroft, Milford.

Most of the site is a relatively flat field separating the A3 road junction from the built up area lying between the old and new A3 roads. Trees belts exist along most of its boundaries. Its landscape benefit to the public is to contribute significantly to the landscape setting of this major road interchange within the AONB. It is not prominent from the new A3 which is at a lower level. However, the roofs of proposed houses might be visible. The undeveloped nature of the site is noticeable from the old A3 through a thin veil of trees. Even though those trees could be supplemented with new planting there would still be a road access with sufficient width and highway works that would afford public views into the development. Development could not therefore be hidden.

Its contribution to the AONB is that it forms part of the wider protected landscape beyond in spite of the publicly necessary large scale road junction which is generously landscaped. Whereas the presence of the built up area of Milford is not readily apparent from this road junction if the site were to be developed it would bring the built up area more into public view. Of all the four sites its development would be the most publicly conspicuous.

100 dwellings are proposed on a site of 3.7ha which amounts to about 11 dwellings per acre. As the site is mostly an open flat field a developer would expect to demonstrate that planning permission should be granted for more development.

DS31 – Land at Old Elstead Road, Milford.

The site is a rectangular flat paddock. The site description refers to residential buildings being to the south east but that is the undeveloped site DS29. Manor Lodge exists some distance beyond. A tree belt fronts onto Old Elstead Road and another separates it from site DS29. The southwest corner of the site is generally open and there seems little reason physically why the triangle of land to the south west was not included. If the site is developed there would seem to be little reason for it not to be included for development in the future. This is a further illustration of the consequences of the allocation of these sites not seemingly having been anticipated in the Plan and which could well lead to significantly more development in the locality.

The site forms part of the wider rural and pleasant setting to housing on this side of the old A3, including the neighbouring buildings of a distinctly rural character. Their setting would be spoilt by the development. Once allocated for housing it would seem difficult for it to be contained. The remainder of the undeveloped areas between the old and new A3 would likely be proposed for further housing in a subsequent local plan and the landscape merits of the wider area would be lost.

60 dwellings are proposed on a site of 2.3ha which amounts to about 11 dwellings per acre.

2.3 Chiddingfold.

Local Plan Part 1 Policy ALH1 allocated 130 dwellings to Chiddingfold, nearly all of which would need to be on green field sites within the AONB. Local Plan Part 2 shows the proposed settlement boundary that has been drawn sufficiently widely in several places to include housing sites to meet at least the allocation of 130 dwellings. I had an informal consultation by a member of the Neighbourhood Plan Team last year. As the public consultation seemingly resulted in a relatively high degree of support for the proposals and the housing sites are not specifically addressed in this Local Plan but seem to be left for the Neighbourhood Plan, this submission does not contain a detailed assessment of each site but contains more general comments.

The main concern is that some sites have been drawn rather widely and would probably result in more than the allocation of 130 dwellings unless this Local Plan and the Neighbourhood Plan contain sufficient safeguards. Probably more AONB land has been allocated for housing than is necessary which may have arisen because many of the boundaries have sought to follow clearly defined physical features.

Site 2 already contains low density housing and presumably the intention is that this could be intensified which would unlikely have significant implications for the AONB.

The southern boundary of Site 2 off Ridgley Road is considered to extend too far up the hill. The top third or so of the site being the highest ground should not be developed but be planted as a woodland or left as paddock. Buildings on this higher north facing slope would likely be prominent in the landscape even though probably not from the wider countryside to the south.

The inclusion of site 4 which is on a steep site at Avola Farm is surprising. It is not a natural housing site and again the development would be prominent and have a dominating impact on its surroundings. The settlement boundary could be drawn to exclude this site especially as

sufficient scope seems to exist on the other sites to meet the Local Plan allocation of 130 dwellings.

Site 5 on the north side of the village is the largest area and another considered possibly to be unnecessarily large. The publicly most conspicuous part of the site is nearest to Petworth Road to the east. If vehicular access is taken off Petworth Road I consider that the access road should wind its way through extensive woodland planting to help screen and soften the impact of development on the wider AONB landscape. Further west development would be less publicly prominent with the implications being more for the occupiers of neighbouring residential properties which is not an AONB consideration. But the development site does project a considerable distance from the existing settlement and breaks out into the wider countryside. If that remains the boundary it is suggested that this plan and/or the Neighbourhood Plan contain a provision that the northern extent be heavily planted to screen the development.

2.4 Elstead.

The housing allocation for Elstead is 160 dwellings of which 69 dwellings have been granted on the Weyburn Works site. That leaves about 91 further dwellings to be provided for in the plan period unless other permissions exist. Beyond any scope within the settlement boundary for further housing, provision to meet the allocation would inevitably involve sites within the AONB that covers the entire village. 3 sites have been selected in the plan.

DS 23 – 35 dwellings on land to the rear of the Croft,
DS 24 – 12 dwellings at Sunray Farm, West Hill and,
DS 25 - 20 dwellings at Four Trees, Hookley Lane,
totalling 67 dwellings. The remaining 24 dwellings would presumably be made up of existing permissions and further dwellings within the settlement boundary. Whether there is scope for any further dwellings within the settlement boundary thereby to necessitate fewer dwellings on green field AONB sites is difficult to know.

Both the inclusion of sites DS23 and DS 24 are regrettable from an AONB aspect. Whether there are less harmful alternative AONB sites is not obvious. The redevelopment of buildings at Sunray Farm should not have a significant impact upon the AONB provided the homes are not large and the site is well landscaped with native planting on the outer edges.

The Plan should stipulate for Sites DS 23 and 24 native tree and hedgerow planting along their outer countryside boundaries to be beyond the gardens of dwellings so the screen does not become denuded through tree removal by owners over time.

3. Avoidance, mitigation, compensation of impacts.

The approach given to the consideration of development proposals affecting AONBs is initially to seek to avoid them and only resort to them when, in the balance of relevant planning considerations, there is no realistic alternative. In that event mitigation measures should be incorporated in development proposals to avoid or significantly reduce the adverse impacts of the development on the AONB.

Where there would still be residual harm to the AONB following those mitigation measures the developer should compensate for the harm caused usually through significant financial contributions towards AONB/AGLV landscape enhancement and access schemes.

Avoidance – the reserve housing site principle

Local Plan Part 1 requires substantial housing development over the plan period. The Council has reluctantly decided that some housing development should take place in the Surrey Hills AONB/AGLV in order to meet objectively assessed housing needs and the Local Plan Inspector's requirements.

No-one knows what the house building rate each year will be in practice. Following the Plan's substantial housing land allocations and in light of the insatiable demand for housing and high property values, more housing could be built in the earlier years of the plan leaving a possible shortage in the latter plan period. Sustainable development objectives are directed at recycling urban/ brown field sites and developing new sites in built up areas first. The incentive for developers to pursue those often more difficult options should not be reduced by the ready availability of easy to develop and attractive AONB sites in the early plan period.

There is a distinct risk easy to develop sites, such as the green field AONB sites that also can be more financially attractive to developers, will be built quickly. Too fast a building rate would result in the lack of the required 5 year housing land supply later in the plan period. That in turn would require an earlier than intended new local plan to provide for even more housing and consideration of further AONB sites for development That would not be good planning.

The Local Plan should therefore husband the release of green field housing land and include a policy of reserve housing sites covering those affecting the Surrey Hills AONB and possibly the AGLV. The principle of reserve housing sites has worked well before in Surrey for the release of sites that would otherwise have been in the Green Belt. The policy would provide that planning permission would only be granted for their development if, and when, a lack of a 5 year housing land supply exists through planning permissions, or is imminent.

For instance, in Milford a developer of the Secretts site considers there is a strong case for development and from the public consultation seems to have a reasonable and unusual degree of public support. The case has already been made above that from an AONB aspect the development of this site for a similar number of dwellings proposed in the AONB at Milford would be preferable.

Those developers can be expected to make their case before the Local Plan Inspector. If they are successful the Local Plan Inspector may not go on to delete from the Plan the Milford AONB sites. Even if they are unsuccessful, the developers may seek to challenge the local plan and/or pursue their chances with another Inspector through an appeal against a consequent refusal of planning permission. Unless the Plan provides for a policy that the AONB sites would be held in reserve and would only be developed if later in the plan period they are necessary to meet the housing allocation in the Plan for Witley, possibly double the amount of housing proposed in the Plan for Milford may materialise. If the Plan were to remain as it is with the difficulty of preventing further land being developed for housing between the old and new A3, there could be more than twice the planned housing provision for Milford having undesirable consequences for the locality.

Mitigation measures – include in the Plan

The Plan should outline for each AONB/AGLV housing site the requirements for landscape mitigation measures. Mitigation measures should form an integral part of any planning application. Too often proposed measures can be superficial but the Plan should stipulate mitigation should be effective and realistic.

The section in a box listing AONB housing sites is unclear as to whether it carries the status of a policy or amplifying text. But provision a) in the box states the following:

*“a) Ensure the conservation of the landscape and scenic beauty of the AONB through the consideration of the individual and cumulative impact of development in the layout, landscaping and design of proposals, informed by a Landscape and Visual Impact Assessment,
b) Retain and enhance mature trees and other landscape features wherever possible....”*

The reference in a) above to ensuring the development would conserve the landscape and scenic beauty of the AONB suggests a misunderstanding of the significance of the Plan proposing housing in the AONB and AGLV. The very fact of allocating significant housing development in a Local Plan on an AONB/AGLV site must mean that its landscape and scenic beauty would not be conserved. No amount of mitigation could result in the landscape and scenic beauty of the site being conserved. Mitigation can reduce the adverse impact upon neighbouring protected landscapes but not conserve the landscape and natural beauty of the site itself. In any event the words set out in a) are normal development control criteria and not special to these AONB/AGLV sites.

Concern that each site has not been subject to an LVIA has already been expressed. But it is agreed that LVIA's should be an essential part of the planning application submissions for the identified AONB/AGLV housing sites.

Too often landscape architects are commissioned late in the process when development proposals have already been largely formulated. The Plan should therefore emphasise that the starting point of any development proposals for these sensitive sites should be a landscape architect's design strategy to mitigate the impact of development on its landscape setting. The Plan should make clear that planning applications for each site will be required to show that effective, realistic and enduring AONB/AGLV mitigation measures are included in the proposals. These can include the need for:

- screen planting along the outer site boundaries, beyond private gardens and to be maintained by a management company,
- locating buildings away from the outer boundaries,
- avoiding or minimising the impact of buildings on higher ground,
- external building materials being of muted colours,
- providing sufficient land within the site for the planting of large native trees with sufficient space to grow fully and without overshadowing neighbouring dwellings and
- the consideration of building heights to avoid the buildings being conspicuous from outside views.

As currently worded in the Plan experience suggests that a developer would be able to avoid the extent of landscape mitigation it is hoped the Council intends. The more recent detailed application for an intensive and poor form of development for 135 dwellings at Sturt Farm is an illustration of what not to do.

Compensation of residual impact.

Rarely would mitigation measures in themselves be sufficient to avoid any adverse landscape impact of the extent of housing proposals for AONB/AGLV sites within the plan. The Plan should therefore give notice to developers of these sites that they will also likely be required to make a financial contribution towards landscape and access improvements where the Council, possibly in consultation with the Surrey Hills AONB Office, consider that the proposed mitigation measures would be insufficient to reduce the harm to the AONB. This would incentivise developers to incorporate sufficient mitigation measures in their proposals. The financial contribution should then also be able to be factored into the purchase price of the site in the same way as CIL and affordable housing requirements and not be introduced later as a possibly unviable requirement.

AONBs do not receive anywhere approaching the level of Government funding directed to National Parks. Yet the landscape and recreation pressures on the Surrey Hills AONB are probably one of the highest of any AONB and National Park in the country. This has been combined with significant cut backs in local authority budgets. The Surrey Hills Trust Fund has been established to provide a charitable vehicle to attract and manage donations and other funding. It is suggested that this Fund be used to channel AONB compensation payments to be additional to the usual CIL contributions so as not to disadvantage other more usual claims for such funding. At an early stage of the process leading to the submission of a planning application the level of contribution would need to be subject to negotiation, possibly in liaison with the Director of the Surrey Hills AONB, as the circumstances of each case will be different. They will depend upon the level and effectiveness of the mitigation measures, the scale of development and other factors.

An example of the type of compensatory measure, if the Council decide to continue with the AONB sites at Milford, is for the developer to contribute to the "Cycle Surrey Hills" Project. The recently prepared plan shows the proposed housing sites to be adjacent to an off road leisure cycle plan of 5 interconnecting loops using primarily bridleways but also other public routes. These are the Elstead Loop, Thursley Loop, Frensham Loop, Devil's Punch Bowl Loop and the Puttenham Loop. The surfacing of the routes can be muddy or too sandy in places and to encourage their public use for health and enjoyment they need improvement and maintenance. Surrey County Highways no longer has a budget for these works and so this is where a developer contribution could be directed.

4. Other AONB considerations.

Policy DM2.

In the criterion b) (iv) add "use of external materials". In the amplifying text please refer to the need to avoid light colour buildings being more conspicuous in protected landscapes when they would contrast with a darker back drop.

Policy DM8

In the supporting text make reference to the Council being unlikely to place much weight upon existing and/or proposed planting to screen an otherwise unacceptable development partly as the planting would unlikely exceed the life of the development.

This AONB advice is often given to case officers on planning applications. It is based upon long experience as a planner.

Paragraph 3.21

The omission of garaging is welcome. Too often agents use the tactic of including the floor area of existing garaging for the purpose of calculating habitable floor area for replacement dwellings in the AONB/AGLV and Green Belt or for house extensions in these areas. No garaging is then included in the new scheme and the floor area of existing garaging is translated into further habitable floor area. Subsequently proposals, often from a new owner, come forward for garaging on the basis it is unreasonable for a Council to deny garaging for occupiers of a substantial house.

Possibly an explanation could be included in the text as to why garaging is excluded from floor area calculations.

Policy DS4 –Land at Aaron's Hill

No recognition has been given to the site being within the AGLV and that the greatest need is to mitigate the impact of development upon the adjoining AGLV. In c) reference is made to the need

for a high quality development integrating with the “townscape”, and not to the landscape. But the character of the adjoining development is not such that should set the benchmark for the new development. It is suggested the plan refers to the need for a substantial tree and shrubbery belt of native species to be planted along the boundaries of the adjoining countryside.

Paragraph 4.22.

The following wording is incorrect and should be removed:

“The Council is seeking to direct this development to sites outside the AONB, or areas of AONB where limited development can be accommodated without significant landscape impact”.

Instead perhaps reference could be made that as the AONB abuts much of Haslemere and options for directing development outside the AONB are limited, some housing allocations are made involving AONB/AGLV land. Further, (if the Council accepts the mitigation and compensatory measures outlined above) the Plan has required stringent mitigation measures to minimise their landscape impacts and if necessary, AONB compensation payments to be directed towards landscape and access improvements.

Paragraph 4.32

Reference has already been made to the need to reword a) in particular and the criteria.

Paragraph 4.35 and boxed wording.

Although there is a general reference to Elstead being in the AONB there is no reference to mitigating the impact of these housing allocations on the adjoining AONB. There seems to be an inconsistency in the Plan between to the approach to the AONB housing sites in Elstead compared to the AONB/AGLV sites in Haslemere. Similar mitigation/compensatory measures as suggested for Haslemere should be included for Elstead especially for an effective and enduring tree and shrubbery screen outside private properties on those parts of the site adjoining the countryside.

Sustainability Appraisal.

The scoring given for the AONB housing sites against the 15 sustainability objectives is in some cases questionable. It is hoped the Council will accept a later submission relating to these and other aspects of the Sustainability Appraisal.

In the meantime an immediate observation is that the statement in Section 7 – Mitigation that *“a full range of mitigation measures has been proposed and are included in relation to each proposed site, as well as the policies applying to these”* is incorrect.

Also, the SA shows DS13 – land north of Haslemere Saw Mills as being outside the AONB when it is believed to be within the AONB. Further, as a general comment, the SA seems to dismiss too readily a site not complying with SA6 – character and quality of landscape, on the grounds that it can be overcome or mitigated acceptably by planting.

Finally, the Director of the Surrey Hills AONB and I would be very happy to discuss any aspects of the above submission with the Council. In particular the reserve housing site concept and the mitigation and compensatory measures would probably warrant further explanation and discussion. Visits with officers to any remaining AONB/AGLV sites would also be welcome to discuss suitable mitigation measures.

Clive Smith
Surrey Hills AONB Planning Adviser
6th July 2018.

The Surrey Hills was one of the first landscapes to be designated an Area of Outstanding Natural Beauty (AONB) in 1958. It is now one of 34 AONBs in England having equal landscape status to a National Park. The Surrey Hills AONB stretches across rural Surrey, covering about a quarter of the county.

The Surrey Hills Board was established in 2008 as a Joint Management Committee to develop policies and programmes that:

- Protect and enhance the natural and cultural heritage of the Surrey Hills
- Enhance public understanding and enjoyment of the area
- Promote the social and economic well being of the Surrey Hills, particularly in regard to achieving the above objectives.

The Core Members funding the Surrey Hills Board are:

- Guildford Borough Council
- Mole Valley District Council
- National Trust
- Natural England
- Reigate and Banstead Borough Council
- Surrey County Council
- Tandridge District Council
- Waverley Borough Council

The Advisory Members (non funding) are:

- CPRE Surrey
- Country Land and Business Association
- National Farmers Union
- Surrey County Association of Parish and Town Councils
- Surrey Hills Society
- Surrey Wildlife Trust

