



Ms Charlotte Glancy
Programme Officer – EiP Waverley Local Plan Part 2
Banks Solutions,
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17 June 2022

Dear Ms Glancy,

MATTER STATEMENT – MATTER 8

We write on behalf of our clients Ptarmigan Land Ltd and Bewley Homes PLC in response to the Inspector's Matters, Issues and Questions published on 29 April 2022. The subject of site allocations in Milford and Witley are discussed under Matter 8 and the points raised in this Matter Statement relate to Issue (i), specifically the proposed allocation under DS14 of the Secretts of Milford site:

Does the LPP2 set out a positively prepared and justified strategy for meeting the housing requirements for Milford and Witley established in LPP1?

With reference to the Council's response to LPP2 Inspector's Preliminary Matters are the site allocations listed below deliverable/developable over the plan period, is their inclusion in LPP2 justified, and would they effectively guide development on the site in a clear and unambiguous way.

Deliverable/developable

The site at Secretts is entirely deliverable and developable within the plan-period. The site has a single land-owner who has signed development and land-promotion agreements with Ptarmigan Land and Bewley Homes PLC.

Since December 2021 the applicant team has been engaged in pre-application discussions with officers to identify how the scheme could come forward. A series of technical investigations (including ecology surveys, tree surveys, drainage studies, and access and highway surveys/assessments) have been undertaken to demonstrate the suitability and the deliverability of the site to provide its full housing allocation within the plan-period. The team is working up a full planning application for the provision of housing and associated commercial uses with the proposed allocation DS14 with the aim of this being determined once the Local Plan has been found sound. This will facilitate the delivery of the site as early as possible within the plan period.

Justified

LPP2 identifies 204 dwellings within its three allocations for Milford and Witley which meets the residual target for the area as identified in LLP1. WBC's response to the Inspector's Preliminary Matters fully sets out the residual housing target for the area and how the proposed allocations would fulfil the targets of LPP2. The plan has accordingly, been positively prepared to meet the requirements for the area.

Policy RE2 of LPP1 (Green Belt) set out that further changes to the Green Belt would be made during LPP2 to deliver the housing targets identified in Milford and Witley through "consultation with local communities". Accordingly, the allocations themselves, have been guided by the Witley Neighbourhood Plan (**Appendix 1**) which was made in November 2020 in the intervening years between LPP1 and this examination.

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 feel within the AONB (**Appendix 3**).

In addition to the AONB Boards concerns previously raised about the alternative sites in Milford, Natural England also raised concerns with the previous approach (**Appendix 4**):

"In regards to allocations made at Milford, we consider that it has not been demonstrated that alternative sites should not be allocated in preference to those made on the Western side of the town, so as to reduce the impact on the AONB. In particular, the Secretts site, assessed within the Sustainability Appraisal to have relatively greater overall sustainability than a number of the sites eventually allocated, would likely be less damaging to the landscape given its location outside of the AONB."

Natural England understand as Competent Authority, Waverley Borough Council have a number of issues to balance when allocating housing provision. We would like to urge Waverley to reconsider

whether there is the possibility through Master planning, for development to occur at the Secretts site, whilst not undermining the Green Belt Review and Plan Part 1. SANG required as avoidance and mitigation for the Wealden Heaths Special Protection Area (SPA), could be placed within the strategic gap to maintain this for example.”

The council has undertaken additional assessment work in line with these comments to come to an alternative conclusion in regard to the allocation of sites around Milford. Accordingly, the allocation of Secretts of Milford to provide the majority of the housing provision for the area is entirely justified, in-line with the Made Neighbourhood Plan and, therefore, LPP1’s direction that further allocations are informed by consultation with the local community.

Furthermore, the evidence base provided with the plan appropriately justifies the allocation of the Secretts site through the Sustainability Appraisal (SA) and the Green Belt Site Appraisals (2020), prepared by Wood. The SA identifies and considers two possible major adverse effects from the development of the site in relation to heritage (the site is partially within the Milford Conservation Area), and landscape (the site adjoins the AONB and is within the Green Belt). These are offset by major beneficial effects in relation to sustainability (proximity to existing amenities and site yield), contribution to housing need, and positive impact on health deprivation. The Green Belt considerations relating to the site are covered in our Matter 3 Statement.

Overall, the allocation of the Secretts site is fully justified and deliverable within the plan period to provide development which accords with the identified preferences of the local community, as identified in the Neighbourhood Plan.

3. DS14 – Land at Secretts

a. Is it clear what is meant by “the necessary infrastructure” in criterion (a) of the policy, and have any site-specific assessments been made?

Since submission of the plan for examination the promoters have been engaged with the local planning authority and the local community through pre-application discussions to develop the proposals for the site with a view of submitting a planning application Summer 2022. As would be expected, in the run-up to preparing a planning application, a number of technical assessments have been undertaken to identify the sustainability of the proposed development and whether any on or off site infrastructure would be required. The work undertaken has identified very few “necessary” infrastructure requirements to off-set the development impacts.

The anticipated scheme is likely to comprise some off-site highway improvements, as identified through ongoing pre-application discussions with Surrey County Council Highway Authority officers. Beyond these works no other infrastructure requirements are deemed “necessary” to make the development acceptable in planning terms. However, in line with the aspirations of the Witley Parish Council Neighbourhood Plan Policy A1 (**Appendix 1**), the proposed scheme provides an opportunity to deliver a new community healthcare hub. The proposed plans include an outline provision for the new healthcare hub that will consolidate the Milford Crossroad Surgery and Witley Surgery on Wheeler Lane into a single hub facility in the heart of the village.

In addition to the above, during consultation with the local community and the Parish Council it has been identified that development of the site provides an opportunity to enhance pedestrian / cycle links to the Aarons Hill area to the north of Milford. The proposals include the provision of a formal pedestrian / cycle link from the north of the site through the remainder of the existing farmland up

to Eashing Lane to the north. This route will connect Milford to the Guildford & Godalming Greenway¹ proposals, ultimately providing a direct connection to Godalming station.

Beyond the infrastructure identified above, other on-site infrastructure necessary to facilitate the development such as open space provision, drainage, access are captured within the draft allocation text.

b. Are there any further updates on the proposals to provide SANG on an adjacent parcel of land, and the planning application related to this matter?

A planning application to change the use of part of the Secretts farmland to provide SANG for the development proposals on the site was submitted on 22 December 2021 (LPA Ref. 21/P/02674). The application has yet to be determined but we understand is being viewed positively by officers. Following the consultation process, no objections to the scheme have been raised and only some minor amendments have been submitted to incorporate cycle parking infrastructure into the proposals, following comments from the highway authority.

Extensive engagement was undertaken with Natural England prior to submission of the SANG application to confirm that it would fully provide for the development's requirements and meet the relevant standards for SANG land.

We hope that the application will be approved prior to the examination hearing session.

c. Is the requirement for separate development plan document for the site justified, and how might it affect the anticipated delivery phasing for the site?

We have previously made representations that we do not consider this part of the policy is justified or necessary.

Given the pre-application discussions that are now ongoing, with an application ready to be submitted imminently, there is no benefit or need for a separate DPD to be prepared to capture the aspirations of the site application. We, therefore, suggest that the policy text is amended to remove this requirement.

d. What is the justification for the inclusion of a new local centre for the village within the allocated site? Is this aspect of the allocation supported by a robust assessment of anticipated need for retail and other uses that might be entailed?

In previous representations we have raised concerns about the wording of this policy and its ambiguity. It had been unclear what the intention of the policy is in the reference to the creation of a new "local centre", particularly having regard to the new proposed local centre shown on Map 57 around the commercial properties on Church Road to the south of the site.

Following pre-application discussions with officers, however, we have greater clarity as to the intention / aspiration of the policy. This is to ensure that the front of the site facing Portsmouth Road (the site of the existing farmshop) is presented as public space and integrates with the existing amenities in the village. The allocation itself does not seek to create a new retail "local centre" and, therefore, it would be sensible for the policy text to be amended to clarify this position.

There is an opportunity in this location to enhance the site's integration with the wider amenities in this part of the village. The proposed masterplan (**Appendix 2**) identifies this part of the site as

¹ <http://www.guildfordgodalminggreenway.com/>



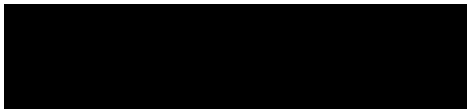
new public realm to include the new healthcare hub and rural business centre along with designated associated car-parking and some free car parking for the wider village. The proposals will also include off-site highway improvements to help integrate the existing amenities off site (Milford Village Hall, post-office and other shops) with this new space.

Importantly, the space has been designed to be landscape focussed, providing public green space in front of the new rural business hub and the healthcare centre.

One of the key benefits of the site compared to other possible growth locations around Milford and Witley is its proximity to the centre of the village and its opportunity to integrate as a mixed-use development with the wider village. Whilst not quite a “local centre” as traditionally defined for retail purposes, the aspiration for the policy to achieve this is supported and based on good place-making principles and so is justified.

Word count: 2109 words

Yours faithfully



Michael Wood
Technical Director



APPENDIX 1 – WITLEY NEIGHBOURHOOD PLAN EXTRACT

Objectives

1. To ensure residents have access to high quality healthcare facilities.
2. To support the Parish's schools and nurseries and enable them to improve and expand their buildings and facilities.
3. To protect and enhance our network of community facilities.
4. To help and support local residents to access high quality and suitable community facilities, including sports teams and interest groups.



- 6.10 The current GP surgeries in the Parish are limited in site space and are unlikely to be able to expand to meet the demand. There are concerns that, when more housing is built in the Parish, there will be more difficulty getting a doctor's appointment and increased parking problems at the existing surgeries. The NPSG is keen to see a new purpose-built healthcare hub that provides facilities for GPs, nurses, a pharmacy and a flexible medical suite. To achieve consistency with locally-generated health needs any such facility should not be less than 12,500 square feet internal floorspace and should provide at least 40 dedicated parking spaces.

Policy A1 – New Community Healthcare Hub

Proposals for the development of a new community healthcare hub will be supported where they are consistent with development plan policies.

Policies

Healthcare Hub

- 6.9 The Waverley Local Plan identifies a need for a significant number of new homes in Witley Parish. There are currently three doctors' surgeries in Milford and Witley. Two of these, Milford Crossroads Surgery in Milford and the Witley Surgery in Wheeler Lane are run by the same team.

- 6.11 The proposals for the new community healthcare hub go beyond the provision of traditional GP services. Plans to include a wider range of outpatient services would mean fewer journeys by local residents to the main local hospitals in Guildford and Frimley. A pharmacy and short-term respite care could also be incorporated.



APPENDIX 2 – PROPOSED MASTERPLAN



**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:

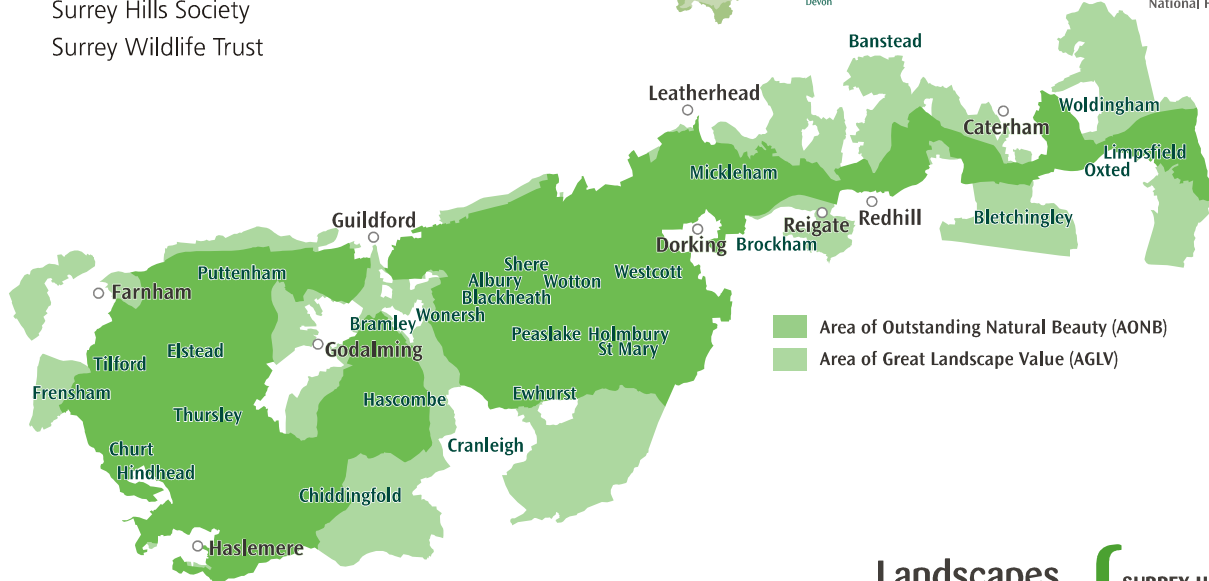
- Protect and enhance the natural and cultural heritage of the Surrey Hills
- Enhance public understanding and enjoyment of the area
- Promote the social and economic well being of the Surrey Hills, particularly in regard to achieving the above objectives.

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





**APPENDIX 4 – NATURAL ENGLAND REPRESENTATION TO
LPP2 9 JULY 2018**

Date: 09 July 2018
Our ref: 248032



Waverley Borough Council

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

To whom it may concern,

Planning consultation: Local Plan Part 2 – Preferred Options

Thank you for your consultation on the above dated 25 May 2018 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Surrey Hills Area of Outstanding Natural Beauty (AONB)

A number of allocations have been made through the Local Plan Part 2 within, or in the setting of, the Surrey Hills AONB. Currently, Natural England does not consider that the allocation process has been informed by evidence sufficient to demonstrate that the allocations, will not have a significant impact on the special qualities of the AONB. We consider that the following allocations are of particular concern:

- DS10, DS11, DS13, DS15 and DS18 (Haslemere)
- DS23, DS24, and DS25 (Elstead)
- DS27, DS29, DS30 and DS31 (Milford)

In our review of the allocations we have referred to the Landscape Study (2014), undertaken to assess the capacity for additional development around existing conurbations within the Borough. In a number of cases, the conclusions of this Study indicate that development in areas where allocations have been made through the Local Plan Part 2, will have a negative impact on the landscape, or that there is limited or no additional capacity for development. This is the case for:

- DS10 and DS15 - corresponding to parcel HE06 of the Study
- DS11 and DS13 - corresponding to parcel HE07
- DS18 - corresponding to parcel HE05 A
- DS25 – corresponding to parcel EL01.

As such, we consider that a number of these allocations have not been made with in line with the existing evidence on landscape impacts.

In regards to allocations made at Milford, we consider that it has not been demonstrated that alternative sites should not be allocated in preference to those made on the Western side of the town, so as to reduce the impact on the AONB. In particular, the Secretts site, assessed within the Sustainability Appraisal to have relatively greater overall sustainability than a number of the sites eventually allocated, would likely be less damaging to the landscape given its location outside of the AONB.

Natural England understand as Competent Authority, Waverley Borough Council have a number of issues to balance when allocating housing provision. We would like to urge Waverley to reconsider whether there is the possibility through Master planning, for development to occur at the Secretts site, whilst not undermining the Green Belt Review and Plan Part 1. SANG required as avoidance and mitigation for the Wealden Heaths Special Protection Area (SPA), could be placed within the strategic gap to maintain this for example.

In order to help Waverley BC provide sufficient evidence to inform these allocations, during a meeting on 03-07-2018 between Natural England and Waverley BC, it was decided that officers from both organisations would individually assess each site considered to be at risk of resulting in impacts on the AONB through a site visit. We are of the opinion that have having colleagues from Surrey Hills AONB Board present at these meetings would also be essential.

Advice provided by through this process could then be submitted as additional evidence for the Local Plan Part 2, and text and policies within the Plan added to accordingly. This would improve the potential soundness of this Plan going forward. It is hoped through a combination of avoidance, mitigation, moderation and master planning we can work together to allow some delivery at the allocations above.

We also advise that landscape provision particularly around the major development test, as described in Paragraphs 115 and 116 of the NPPF, will need to be discussed within this document. Given the quanta of housing proposed within the AONB and its setting through the Local Plan Part 2.

Natural England continue to have some concerns around the allocated sites at Chiddingfold, particularly Avola Farm. We are looking to engage with the Neighbourhood Plan group in the near future, to address those. A similar process as discussed above to inform the evidence base would be beneficial to all, in our opinion.

Development Management Policies

We note that there is currently insufficient policy within the plan to ensure that any windfall development within the Surrey Hills AONB or the South Downs National Park, or within the settings of these designated landscapes, does not conflict with the special qualities of these areas.

Policy should be included which states that any development proposed within nationally important landscapes, or within the setting of these landscapes, will need to be informed by a Landscape Character Assessment and a Landscape and Visual Impact Assessment in order to gauge the impact upon the landscape. In the absence of these assessments, the development should be refused.

Furthermore, developments coming forward within the AONB or AONB setting will often need to provide mitigation in order to be considered acceptable within the landscape context. As such, policy should be included which refers to the AONB management plan, and which stipulates that landscape mitigation measures will often be necessary in order to be considered acceptable, subject to the findings of the LVIA.

Wealden Heaths Phase II Special Protection Area (SPA)

One allocation is made for 39 dwellings at Hindhead (DS8). It is currently our understanding that this allocation would bring the total number of dwellings coming forward through the Hindhead Avoidance Strategy to over 100. Given that 100 dwellings is the maximum number of dwellings considered to be acceptable through this Strategy, the number of allocated dwellings should be revised down, such that the 100-dwelling threshold is not exceeded. Without such an amendment, we would not consider the Plan to be sound.

Wealden Heaths Phase II SPA is designated for a number of Annex 1 ground-nesting birds. It is now well-established that the populations of these birds are sensitive to recreational pressure. As such, in the absence of mitigation, additional residential development coming forward within the vicinity of the SPA would likely result in an adverse effect on the SPA in-combination.

Therefore we consider that the following allocations will likely require avoidance measures through the provision of Suitable Alternative Natural Greenspace (SANG) or something similar in order to avoid an adverse effect on the SPA:

- DS19, DS12, DS20, DS4, DS23, DS24, DS25, DS27, DS28, DS29, DS30, DS31

The following allocations may also require SANG or something similar, and should be informed by a Habitats Regulations Assessment (HRA):

- DS7, DS10, DS11, DS13, DS14, DS15, DS16

We consider that the text associated with each of these allocations is amended to describe the need for SANG or similar, either through the provision of a bespoke SANG, or through contributions to another project.

If you have any queries relating to the advice in this letter please contact me at chris.baines@naturalengland.org.uk.

Yours sincerely,

Chris Baines
Sustainable Development Adviser
Thames Team