

ADDITIONAL SUBMISSION FROM THE SURREY HILLS AONB PLANNING ADVISER TO WAVERLEY LOCAL PLAN PART 2 INSPECTOR'S MATTERS, ISSUES AND QUESTIONS.

This additional statement is made on behalf of the Surrey Hills AONB Board that has delegated to me as its Planning Adviser the authority to represent it on all planning matters.

Matter 6 - Housing requirements and general supply matters.

Issue (ii) Does LPP2 set out a positively prepared strategy for meeting housing requirements established in LPP1?

Question. 3. Does the approach to site selection reflect the great weight that should be given to conserving and enhancing landscape and scenic beauty in AONBs?

Response: Generally yes, and LPP2 is a significant improvement upon LPP1 which indicated possible Green Belt release sites within the AONB, especially at Milford. As unsuccessfully sought at that time the release of Green Belt land at Secretts would be a more sustainable form of development than 3 AONB sites west of Milford. Therefore the inclusion now of the Secretts site that is outside the AONB and not impacting upon its setting is welcomed.

The change of circumstances in relation to the Royal Junior School at Hindhead following the allowing of the appeal for 50 dwellings at the Red Court site south of Haslemere points to the school's allocation for 90 dwellings as being a major development in the AONB that is unsustainable and no longer justified. This is expanded upon later in this submission under Matter 7.

Of possible relevance is the Government's latest "levelling up agenda to revise the housing requirements to be met in areas heavily constrained, such as those areas with extensive Green Belt and AONBs. Waverley must be one such authority as it has both. LPP1 being the adopted more strategic local plan has to be respected. But, if the housing provision in LPP2 is deemed to fall short of that set out in LPP1, the Inspector may consider it justified that if that shortfall is not substantial then a rational approach would be to err on the side of not requiring amendments that would contradict the direction of travel of Government planning policy. Whilst that emerging policy has not yet been formally adopted by the Government it is consistent with the Government's push for "levelling up" by encouraging development growth to the North and other more deprived areas. That initiative will not work if developers find it more profitable and easier to develop housing in a wealthy Green Belt and AONB/AGLV Borough like Waverley. LPP2 should not shortly after adoption be out of step with likely revised Government policy through harmful housing allocations that will work against the Government's levelling up agenda.

I was involved in the South East Plan and Surrey Structure Plans that set a properly planned and logical approach to providing a framework for individual Borough District Local Plans. An earlier Government decision to scrap both has resulted in crude and illogical Government formulae housing requirements being imposed in a broad brush and unjustified way on local authorities, such as Waverley. There is a danger therefore that the balance between providing for housing needs, which should be weighted heavily in providing affordable housing on green field sites, and the environmental and Government's economic national policies, might be wrong in light of more recent circumstances.

On a more detailed AONB issue, concern has been expressed at the planning permissions that have recently been granted in Waverley to convert mostly timber stables to dwellings. Once the principle of residential use is established by the grant of these permissions, this is followed by an application for a new build dwelling on the grounds of a more satisfactory dwelling and attractive building in the AONB than converted stables. There is also at least one known instance where planning permission has been granted for replacement stables as well and permission to enlarge but not implement an extension to the stables to form the baseline for a larger replacement dwelling. This has been followed by a neighbour being granted for similar development resulting in two houses in the AONB and Green belt which would not have been granted had it not been for this incremental approach to seeking permissions. Stables are associated with the use of the land which does not apply to dwellings with no such association with the management of the land.

There are hundreds or thousands of such timber stables across the Surrey Hills AONB. Consequently, the potential for change to the character of the Surrey Hills AONB is at risk unless this lack of vigilance in development management does not go unchecked. The very significant uplift in property value of a site for a dwelling in the Surrey Hills AONB from about £30,000 for stables erected in a few days to in excess of £500,000 gives owners a strong incentive to pursue such proposals. House prices in the Surrey Hills AONB have been found to be the highest of any AONB or National Park in the country, even The Chilterns and Kent Downs AONB.

A distinction could possibly be drawn, if considered justified between proposals within the Green Belt outside the AONB and sites within the AONB. This problem has been raised with Waverley Planning Department by both the Chair of the Surrey Hills AONB a former chief planner and constituent Surrey Hills District Chief Executive and myself, but so far without any conclusion. The Inspector might invite the Borough Council to include a suitable modification to the local plan to close this apparent loophole or harmful interpretation of Government policy within the Surrey Hills AONB.

Matter 7 - Housing Allocations - Haslemere and Hindhead

7. DS09 - National Trust Car Park.

Question: a) *The site is within the AONB, adjacent to the SPA and is close to ancient woodland - to what extent would delivery of the site and any enhanced highways access facilities respond to these designations and features?*

Response: As the proposal is of a relatively small scale, involves redevelopment and is well screened by trees likely to remain, there is considered to be no AONB concern to this proposal.

11. DS06 - The Royal Junior School.

Question: b) *Would the delivery of 90 dwellings constitute "major development" for the purposes of paragraph 177 of the Framework, and what implications might this have for the delivery of the site?*

Response: To accommodate 90 dwellings on this site would involve extensive development over undeveloped open parts of the site and could not reasonably be expected to be confined to the conversion of the original country house and redevelopment of the school buildings and car park, I therefore consider, on balance, it probably would constitute "major development" for the purposes of NPPF paragraph 177.

Appeal and Council planning application decisions relating to "major development" in an AONB vary throughout the country and no clear guidelines have been published by the Government probably as the circumstances of each case will vary. As footnote 60 to NPPF paragraph 177 states it is "*matter for the decision maker, taking into account its nature, scale and setting and*

whether it could have a significant adverse impact on the purposes for which the area had been designated or defined”.

With the site mostly currently being a school, a residential development for 90 dwellings is a different use together with being of a different nature in its form and character to the school. Judging from an initial scheme architects prepared, the development envisaged would extend over the whole site except for the woodlands in order to accommodate 90 dwellings of different sizes. The scale of buildings would be significantly greater than currently.

However, the setting is not the most sensitive in AONB terms with the busy A3 road to the west, road junction to the north, and detached housing to the east. Consequently, in connection with the footnote in the NPPF, I do not regard the setting as being the most sensitive in the Surrey Hills AONB. But I consider the other relevant factors do point to this being a “major development” in an AONB.

If the development could be confined to converting the original country house into apartments and the school buildings redeveloped to provide dwellings of similar collective bulk, I do not consider such a proposal would constitute a major development in an AONB. This would be even were the building form to be different and a scheme were not tied over rigidly to the footprints of the school buildings. When I was first introduced to the idea that the Royal Junior School might be an alternative to proposed housing of 50 dwellings at Red Court on the south side of Haslemere I thought that it might be preferable for say about 50 dwellings confined to the currently developed part of the site. This was even though it is in the AONB while Red Court is in the AGLV and adjoining the AONB. In terms of landscape value and impact I assessed the school site would be less harmful on this basis than the unspoilt hilltop Red Court site.

When indicating the school site might have a capacity of about 80 dwellings rather than 90 dwellings in the Plan, I envisaged they would be smaller dwellings at a higher density on generally the developed parts of the site with possibly a little overlap, provided the landscape on the remainder could be enhanced. The more recent appeal decision to allow 50 dwellings on the Red Court site has changed the circumstances under which the school site might have been acceptable in AONB terms for residential development of this magnitude. If it is to be allocated in the Plan for residential development I consider that probably about 50 well designed dwellings, including affordable housing, limited to the existing developed parts of the site should be specified provided there would be landscape enhancements of the remainder of the site. A scheme would also need to meet Natural England’s SPA requirements which might be more likely with a greater area of land for public access compared to a scheme for about 90 dwellings. If there were between 40 and 50 dwellings, with the windfall of 50 dwellings on the Red Court site, the Plan’s housing provision would not be compromised. However, whether that would be a viable option for the relocation of the Junior School to the Farnham Lane site and in an acceptable planning form, is for the school to advise.

Annexed at the end of this submission is my email of 21/03/2022 to Waverley Planning Department on this latest situation following the Red Court appeal decision.

Question: e) Is it clear that the Royal School’s Farnham Lane facility has the capacity to accommodate pupils displaced from the Junior School site?

Response: The School had indicated that combining the Junior School at the Farnham Lane site there would not be material increase in building bulk, but any slight increase would be compensated by significantly better building designs and no harm to that part of the AONB in which it is located. However, I have not seen any scheme and it is a sensitive remote site in the AONB. I would need to assess such proposals on their merits as to whether they would conserve and enhance the landscape and scenic beauty of the AONB. Consequently, there is some uncertainty whether such a proposal would be acceptable from an AONB aspect.

Finally, I am afraid I shall be abroad when the Hearing will be discussing these issues.

ANNEXE My email of 21/03/2022 to Carole Cockburn within the Waverley Planning Policy Team relating to WBC's response to LPP2 Inspector.

Dear Carole,

The main reason for my support that up to about 80 dwellings, not the 90 in the Submitted Local Plan, was that I considered the landscape harm of redeveloping the Royal Junior School site with its buildings and car parking areas would be less harmful than 50 dwellings on the lovely unspoilt Red Court site off Scotland Lane free of any development. The latter is within the AGLV designation. I agreed with the Hankinson Duckett Associates 2013 independent specialist landscape character assessment recommendation to Natural England which commissioned their study that it should be included in the AONB in the AONB boundary review as its omission is an anomaly. The site also adjoins the AONB, and I consider its development would have some detrimental impact upon its setting.

Now the appeal for 50 dwellings at Red Court has disappointedly been allowed my reasoning for preferring the School site over the Red Court site falls away.

Therefore, my AONB advice for any housing at the Royal School site would be that it should be restricted to the conversion of the main house into apartments and the appropriate well-designed redevelopment of the more recent school buildings and possibly the main parking area. However, there should be no greater extent of hard surfaces than currently exist. Development on the playing fields or other open green areas should be avoided. But there may be some landscape merit in relocating the developed areas but that would need to be demonstrated and proven. The collective building bulk/volume on the site should be no greater than the existing.

Natural England would need to be satisfied that any SPA provided on the site met their requirements.

A significant proportion of the homes should be affordable, and many of the others should be smaller dwellings although that would need to be determined by the Borough Council. Without seeing a sketch or feasibility scheme I cannot indicate the number of dwellings that might be satisfactorily achievable, but it would probably be significantly less than the 90 dwellings in the Local Plan. As the 50 dwellings allowed at Red Court were not provided for in the Local Plan, the School site may be able to achieve about 40 dwellings which would equate with the Local Plan provision.

The associated factor to be considered is the redevelopment of the School's Farnham Lane site. I had been led to believe that combining the Junior School on the site would not materially increase building bulk, but any slight increase would be compensated by significantly better building designs and no harm to this part of the AONB. That would still need to be demonstrated satisfactorily and combining both Schools on that site may be difficult.

I hope this helps both the Borough Council and the Local Plan Inspector. If either of you have any queries please do not hesitate to come back to me.

Kind regards,

Clive Smith
Surre Hills AONB Planning Adviser



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:

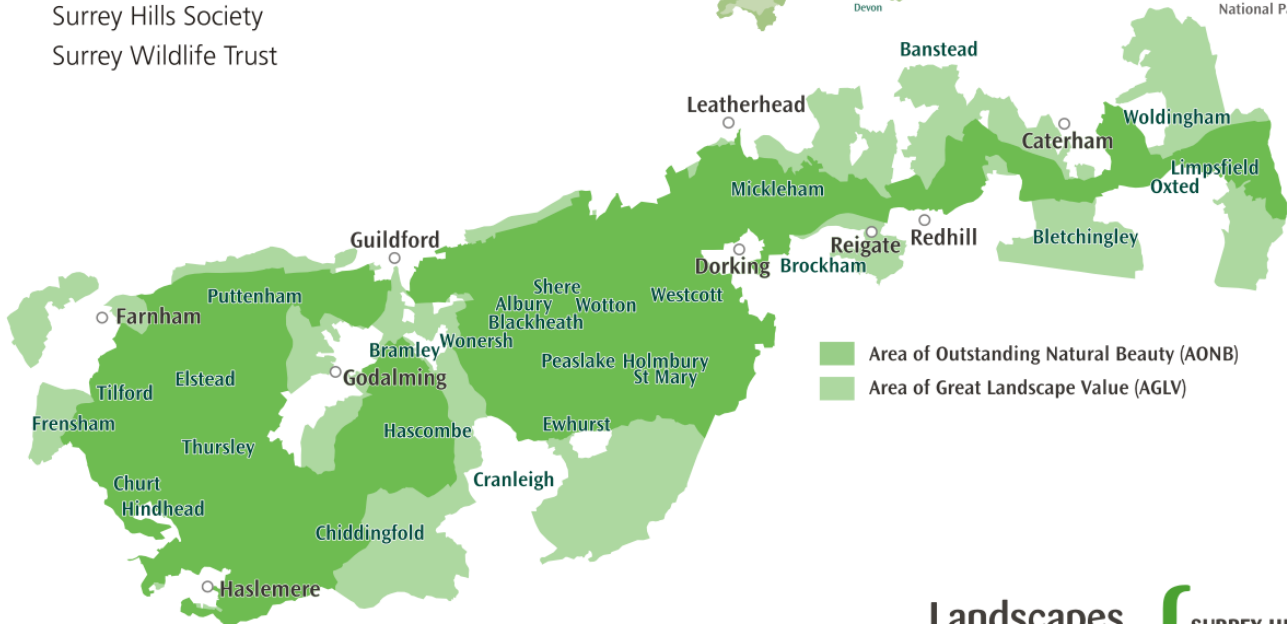
- Protect and enhance the natural and cultural heritage of the Surrey Hills
- Enhance public understanding and enjoyment of the area
- Promote the social and economic well being of the Surrey Hills, particularly in regard to achieving the above objectives.

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



■ Area of Outstanding Natural Beauty (AONB)
■ Area of Great Landscape Value (AGLV)