



Surrey Hills Area of Outstanding Natural Beauty Board

13 September 2023

Planning Adviser's Annual Report

Purpose of the report:

To review the work of the Surrey Hills Planning Adviser
To consider the potential impact of extending permitted development rights

Recommendations:

Members are asked to

1. Note the Planning Adviser's annual update.
2. Agree the annexed Board's submission by the Chair to the Government consultation on extending Permitted Development Rights in AONBs, copy to local Members of Parliament and give local publicity to the concerns.

1. Introduction

- 1.1 The planning process is the most important function that protects the Surrey Hills Area of Outstanding Natural Beauty from inappropriate development. Providing advice on planning policy and development proposals is a core function of the Surrey Hills AONB Board.
- 1.2 Clive Smith is employed as the Surrey Hills Planning Adviser. There is also an Officers Working Group composed of planning officers from the respective local authorities that provides technical advice and helps to share information on AONB matters between the authorities.

2. Local Authority Planning Resources.

2.1 Your Planning Adviser has been acutely aware that all 5 District and Borough Council Planning Departments have been and continue to be overstretched. Staff in those Departments have been doing all they possibly can to manage the workload but many planning applications have been taking a long time to determine. One has to sympathise with them. To give priority to the determination of applications some authorities stopped offering paid pre-application planning advice.

2.2 In May this year Waverley and Guildford Borough Councils were among 10 Councils warned by Michael Gove, the Levelling Up, Housing and Communities Secretary of State, that their jointly run planning departments were not good enough and he threatened to remove their decision-making planning powers. If that were to happen developers could go directly to the Planning Inspectorate for their

applications to be determined. It would take decision making, including consideration of any AONB planning advice, away from the local communities. The two Councils were given until June to make the required improvement to their planning service.

2.3 No further information since June is known which suggests that no Government action has been taken. It has been noticed that several new planning case officer names have appeared on planning application consultations referred to your Planning Adviser which suggests that further temporary staff have been employed.

2.4 This problem has probably arisen because of the financial stringencies of Councils. It is for each Council to determine its own spending priorities. However, a consideration is that Surrey people seem to give priority to local environmental protection.

3. Overview of AONB planning application consultations.

3.1 In 2022 AONB responses were given to about 420 planning application consultations. The figure in 2023 may be almost as many. In April the Heads or Directors of Planning were asked to consider reducing the number to the more significant development proposals that might have AONB implications as it has been difficult to sustain well considered advice to so many consultations. Responses are still awaited from Waverley and Guildford which generate by far the most consultations.

3.2 The pre-application AONB planning advice offered to potential development applicants brings in a small income.

3.3 Fortunately, no major development proposals have been received. The message seems to have got across that larger development proposals should be steered away from this AONB. It has been more the plethora of smaller proposals that taken together, if permitted, could have a significant impact upon the Surrey Hills AONB. These have included the residential conversion of rural buildings and even some timber stables, and the replacement of outbuildings to dwellings. Several of these have been of AONB concern and the fact they seem to be increasing in numbers.

3.4 Ironically, it is these rural building conversions that the Government is currently consulting upon to have permitted development rights in AONBs and National Parks (NP) without the need for planning permission. With the Surrey Hills AONB having the highest house prices of any AONB or NP in the country the financial incentive to convert low value buildings to high value up market housing makes it financially a most attractive proposition for property owners. **The suggested response of the Board to the Government is attached to this report. The Board Chair has asked that before the Board meeting District and Borough Board Members consult with their respective Planning Departments over this draft report. This would be so any additional or revised views can be considered at the meeting and to ask Officers also to make a consultation submission to the Government.**

4. Local Plan Overview.

4.1 Most Surrey Hills constituent Councils have up to date Local Plans. The Waverley Local Plan Part 2 was adopted earlier this year. Significantly, it deleted 3 potential AONB housing sites in the earlier Local Plan Part 1 to which the Board objected, by finding an alternative site at Milford beyond the AONB. The Council must be thanked for that.

4.2 Unfortunately, Tandridge has suffered from a long drawn-out Inspector consideration over several years of their Draft Local Plan only for the Inspector recently

to conclude, in my view through no fault of the Council, that the Plan is unsound. So, the Council seemingly has to start again. With no up-to-date local plan the Council, including the AONB within it, could be more open to development proposals in locations that would have been contrary to the draft Local Plan.

5. Potential Implications of the AONB Boundary Extensions.

5.1 Natural England (NE) has indicated that it is taking longer for them to assess responses to their public and statutory consultation earlier this year than had been anticipated because of so many suggestions for additional areas for AONB designation. There will therefore be some slippage in the programme and there may be a need for another consultation just on any additional areas.

5.2 In the meantime, the issue arises as to the approach to be taken to development proposals within the AONB candidate areas. The April letter referred to above to Heads and Directors of Planning suggested that as the review is at such an early stage only larger scale development proposals should be consulted upon if they had the potential, if permitted, for NE to conclude at a later stage of the review they would no longer meet the criteria for AONB designation. An example is the outstanding application for solar panel arrays in 3 fields to the west of Guildford at the foot of the Hogs Back that are within an AONB candidate area. This issue has been raised with the Planning Department.

5.3 Another matter is the future status of existing Areas of Great Landscape Value (AGLV) that are not to be included in the AONB. Local Plan policies state they are to be protected along similar principles to the AONB until the AONB Review has been carried out. It has been suggested to Councils that they should start to put in train arrangements and future financial provision for a joint consultant landscape architects' assessment for these areas and other possibly locally valued landscapes for possible landscape designations in their next local plans. As this process may take some time, they should be ready to go with the assessment when NE submit their proposed AONB extensions to the Secretary of State. To leave consideration until then would lead to delay and the greater vulnerability of those areas to development proposals in the interim.