



Surrey Hills Board

The Surrey Hills Management Plan - A 75-year vision for a thriving National Landscape for people and nature

Purpose of the report:

To note the response to the Management Plan consultation and to agree the timetable for adoption and publication

Recommendations:

Members are asked to

- 1) Note the responses to the consultation
- 2) Advise on the proposed changes to the policies and the publishing of the Management Plan
- 3) Agree the process for signing off the draft for local authority adoption and timetable for consultation and adoption

1. Introduction

- 1.1 The statutory Management Plan is the primary document through which the purposes of the National Landscape can be achieved. It sets out the ambition, strategy, and guidance to achieve the purposes of the designation and enhancing people's quality of life.
- 1.2 The current Surrey Hills Management Plan has been adopted as a statutory document that sets out the vision and policy framework for the period 2020 to 2025. It was adopted by all the constituent local authorities. A new Management Plan for the Surrey Hills National Landscape will need to be adopted for the period 2025 – 2030.
- 1.3 2024 was the 75 Anniversary of the 1949 National Park and Access to the Countryside Act. This presented an opportunity to look back at how the landscape has been protected and to consider a positive vision of what a thriving Surrey Hills landscape could be like in the next 75 years (2025 – 2100); a 22nd Century vision.

- 1.4 As Natural England is currently undertaking the boundary review and Surrey authorities are going through a process of local government reorganisation, the Management Plan sets out a vision and policy framework that can be adopted for an extended Surrey Hills National Landscape area and by new local authority partners, as appropriate.

3. Preparing the Management Plan

3.1 The National Landscape Director has led a small and flexible task group to develop the new Management Plan reporting to the Surrey Hills Chair. This is supported by a consultant and the Surrey Hills Communications Lead. The process has engaged the SCC Greener Futures team, Chair of the Officers Working Group, Natural England, Surrey Wildlife Trust and the Local Nature Recovery Strategy Lead.

3.2 The 75th Anniversary of the seminal 1949 National Parks and Access to the Countryside Act provided the inspiration for this Management Plan. It was an opportunity to consider how the landscape has been conserved and enhanced over the past 75 years and to consider the vision, principles and priorities for the Surrey Hills over the next 75 years, to the 22nd Century. In April 2024, a Postcards from the Future campaign was launched by Julian Glover, Chair of the 2019 Designated Landscapes Review. This campaign encouraged the public to describe the Surrey Hills as a thriving place for people and nature in a changing climate by 2100.

3.3 Over 200 submissions were synthesised using AI tools to help create vision statements and identify the strategic priorities to deliver the vision. This was used to create an online public survey that was launched in September 2024 which received over 1000 submissions identifying the special qualities, the pressures, appraising the vision statements and rating the importance of the priorities.

3.4 Meetings were held in November to consider the survey findings and to review the Management Plan policies and programmes. This included a session with farmers and landowners, a workshop with partners and community groups at Shalford and meetings of the Surrey Hills Planning Officers.

3.5 The Surrey Hills Symposium, entitled Nature Calling, at Surrey University attended by 300 people, was another opportunity to develop the 75-year vision for the Surrey Hills as a thriving place for people and nature. Contributions from the speakers, panellists and guests identified their respective visions, the barriers and priority actions. The performance artist Rosie May recited her poem, The Year Twenty-One Hundred, which was based on her appraisal of the Postcard campaign and was used to promote the Management Plan consultation and lead sessions with cohorts of young people.

4. Appraisal of Responses to Consultation and the Survey

- 4.1 The Consultation draft was launched by Professor Richard Murphy, Chair of Surrey Nature Partnership, at the Biodiversity and Planning Conference in Dorking on Tuesday 25 March. This is an opportunity for

individuals and organisations to comment. The consultation closed on Friday, 6 June. There have been over 40 responses to the consultation draft including extensive written representations from the CLA, NFU, Save Surrey Countryside, Surrey Nature Partnership, Natural England, Forestry Commission and the local authorities. Parish councils and community groups also submitted written responses with very few members of the public, which contrasts with relatively high numbers of the public to the Management Plan survey. The public that did respond covered a wide spectrum of interests and expertise including farming, the arts, mountain bike and equestrian matters

- 4.2 Planning. The Management Plan policies will need to balance the competing interests. Some of the main Planning tensions were around the farming and land-owning community making the case for rural enterprise and diversification as the Surrey Hills needs to be maintained as a living and working landscape. There is also a demand for more social housing and community infrastructure to maintain the viability of communities, which also helps to sustain a vibrant visitor economy to allow people to access and enjoy the Surrey Hills. This contrasts with some consultees stressing the need to have strict controls on development and concern about visitor pressure on the Surrey Hills communities and habitats.
- 4.3 Ancient Trees and Woodlands. The survey findings highlighted the greatest priority should be given to ancient trees and woodlands as the most valued feature of the Surrey Hills. The Surrey Hills now has 47% woodland cover. This reflects how the Surrey Hills landscape has changed over the last 75 years, with the resultant loss of important open habitats like lowland heath and chalk downland, and the poor condition of many designated sites. The implication is that the Targets for the Surrey Hills are to re-create more open habitats, which may result in reduced woodland cover, but to increase 'trees outside woodland' to better connect important woodland across the landscape and create more robust hedgerows and agroforestry which helps with climate resilience and enhance animal welfare (trees provide valuable shelter throughout the seasons but particularly in the light of Climate Change pattern of hotter summers and wetter winters).
- 4.4 Countryside Access. Another area of tension is around countryside access. Comments and survey findings identified the need to control, and even seek to ban, activities like motorised vehicles in the countryside and mountain bikes in open countryside as these impact on the natural beauty, habitats and features like tranquillity. However, it is also recognised that the Surrey Hills is a popular destination for visitors and should be promoted and enjoyed responsibly by all user groups. It is important to note that 'restricting areas for nature' was identified one of the highest priorities in the survey.
- 4.5 Dogs in the countryside. This was highlighted, particularly by land managers, as a major issue in the Surrey Hills and also wider Surrey. The survey and evidence indicate that this is perhaps most popular activity. Dogs provide incentives to access the countryside benefiting people's mental health and well-being, however the impact of dogs on livestock and disturbance of nature including ground nesting birds and ponds, are one of the biggest concerns. This is an area to address in the activities of the Surrey Hills National Landscape Team and partners like the Surrey Nature Partnership, building on the love Dogs, Love Nature Surrey University study.
- 4.6 Community renewables and decarbonisation. Although a priority in the Management Plan is to mitigate and adapt to Climate Change, there are major challenges identified particularly related to the scale and impact of solar farms. This has been addressed in a Position Statement that the Surrey Hills has published. The opportunity for more wood to be harvested for low carbon energy and heating is supported by the Forestry Commission, the CLA and NFU but concerns expressed, particularly by Save Surrey Countryside about the impact of harvesting trees and air quality on the environment. There were also challenges around livestock farming and emissions reduction, whilst recognising the need to maintain and introduce more grazing across the Surrey Hills, particularly to sustain important open habitats.

4.7 Cultural heritage and the arts. Several individuals and Save Surrey Countryside expressed concern about the focus on the arts on engaging communities and creating new installations in the countryside. There was however overall support for the arts with only 7% of respondents indicating that it was 'not important' with the majority of respondents indicating this was an 'important' or 'very important' to the Surrey Hills.

4.8 Rural enterprise and tourism. There were concerns about the need to balance visitor numbers to reduce impact on communities and habitats but over there is support for taking action for promote the rural economy with 83% of respondents to the survey indicating that 'supporting local businesses' was important or very important. The opportunity for business to provide opportunities to welcome and educate visitors was generally supported, as well as providing jobs, training and sustaining important local community infrastructure like pubs, local shops and transport.

5. Overview of proposed changes to consultation draft

5.1 Part 1. Introduction to National Landscapes. This set the scene regarding the 1949 Act, the National Landscape designation, the status of the Management Plan and the Core Principles at the heart of securing the long-term vision. This section was generally supported with limited amount of changes proposed. The Core Principles were supported and seen as important.

5.5.1 The proposed changes include:

- a more detailed map of the area and update on the Boundary Extension and implications for the Surrey Hills National Landscape.
- greater detail on policy and legislative background with footnote and links to relevant documents.
- a clearer vision statement for the Surrey Hills as a National Landscape to provide context for the rest of the Management Plan.

5.2 Part 2. The Surrey Hills National Landscape. This included the Statement of Significance as to why the Surrey Hills is designated as a National Landscape, the pressures and threats, and the outstanding qualities that need to be conserved and enhanced. There was feedback that this section was too long and that special character of the Surrey Hills could be listed in alphabetical order based on importance.

5.2.1 Proposed changes are:

- to use photographs to illustrate special qualities
- greater reference to Surrey as evidence of public support and recognition of special qualities.
- reference to chalk steams (winterbournes and spring lines)
- refer to 'darker skies' rather than dark skies

5.3 Part 3. The 75-year Vision for the Surrey Hills. This included the vision statement for 2100 for Nature, People and Climate arising out of the Postcard from the Future engagement process. It included an appraisal of the past, present and future to set out Targets for each theme and the proposed Strategic Priorities that need to be delivered over the next 75 years. The vision statements were generally supported but there was concern about the 3 statements being too similar and need to be clearly related to the strategic priorities. There was concern that some of the strategic priorities, eg the local provision of health infrastructure, were out of the scope of a National Landscape Management Plan. Also, several comments were that the 75-year review

(past, present and future) was generally interesting but too long and therefore often lacked relevance. The Targets should also be clearly explained and justified.

5.3.1 The proposed changes are:

- to draft the 3 vision statements as Mission statements for the respective areas and amending to include comments (see Annex 1)
- to review Targets and provide clearer justification.

5.4 Part 4. The Policy Framework for 2025 – 2030. This set out the policy objectives as guidance to Responsible Bodies on how to seek to further the purpose of the designation, in line with the LURA 2023 duty. This was the focus for the feedback and is considered to be where the Management Plan can have the greatest impact. In general, the strategic policies can at times seem to seek changes to the existing legislative base or introduce policy that may be considered to be beyond the scope of the Management Plan. Therefore, care and clarity need to be taken to not conflate with legislative provisions or be overly prescriptive. Most of the policies however had general support with proposals for minor changes and amalgamation of some Planning policies. Surrey CC Heritage Services also proposed a new Management Plan policy (see Annex 2).

5.4.1 The proposed actions are:

- for the Officers Working Group to ensure that policies are consistent with Local Plan policies and legislation, particularly Planning
- for the policies to be published in full as part of an Executive Summary

5.5 Part 5. The Delivery Strategy. This included guidance to Responsible Bodies and set out the role of the Surrey Hills Management Board, the Brand Strategy, monitoring and review of the Plan. This section received little feedback. There is general uncertainty about the requirement of Responsible Bodies under LURA as this is new legislation, which is being challenged and tested in the courts, although the application of the hierarchy principle of 'avoid, mitigate and then compensate' was considered as having a potentially major impact on the Surrey Hills. There was general support for the charter relating to how wider society could help protect and enhance the Surrey Hills.

5.5.1 The proposed actions are:

- clearer context around LURA duty and hierarchy principle
- promotion of the 'Charter'

5. Adoption of the Management Plan

5.1 The National Landscape team will work with the Surrey Hills Officers Working Group to consider the amendments to the Management Plan and seek to adopt through the respective local authorities by the end of September 2025.

5.2 It is proposed that Members of the Board provide feedback on this report of consultation and proposed amendments (Annex 2) by Friday 11th July. It is proposed that the Board delegates to the Surrey Hills Chair and the Chair of the Planning Officers Working Group the sign off the Management Plan. The Management Plan draft will be presented to the Board for information in September. As with previous Management Plan adoption, any amendments that local authorities request through the

adoption process will be agreed by delegation with the other authorities to ensure one consistent adopted plan for the Surrey Hills National Landscape.

- 5.3 The adoption period will include the production of a Strategic Environmental Assessment and a Habitats Regulations Assessment (HRA) to assess the impact that the Plan's policies would have on designated habitats, and an Equality Impact Assessment to ensure that no section of society is unduly disadvantaged. These reports will be published on the Management Plan website platform.

6. Publishing and promoting the Management Plan

6.1 It is proposed that the Management Plan will be published as 3 documents. These will be presented in more detail at the next Board meeting but in summary the following is being proposed:

Full Management Plan. To publish the full document as 5 Parts online on a dedicated web platform. This will also be available to download. It is proposed to have limited graphics but will provide links to key reference documents

Executive Summary and Management Plan Policy framework. To publish an A4 printed document with full design using maps, photographs and illustrations. It will provide a summary of the 5 Part Management Plan with QR links to the relevant online platform. The target audience will be Responsible Bodies, Officers, Members, parish councils, decision makers, land managers and funding partners. It will include all the Management Plan policies and provide contact information.

75-year Vision and Charter. To publish a public facing document that will set out the 75-year vision and priorities for the Surrey Hills. It will include contact information, links to the Management Plan website, a map, the Year 2100 poem and the Charter (Part 5) on how people can make a positive contribution to the Surrey Hills, including volunteering. This will be available through the Society, our Enterprises events and other public facing opportunities.

6.2 The launch of the Management Plan will be at a reception for the Surrey Hills Symposium at Surrey University on 19th November.

Appendix 1. Summary of Engagement, Consultation and Adoption Programme

Activity	Content	Timescale
Management Plan Survey	Evidence and engagement 75 Vision Pressures and threats Priorities for Nature Priorities for People Priorities for Climate	October to November 2024
Landowner and farmer workshop	Discuss issues and priorities	6 th November
Surrey Hills Symposium	A public forum to develop the 75-year vision, identifies the barriers and 5-year priorities	13 th November
Management Plan workshops	Review the survey and Management Plan policies	22 nd November
Planning Officers Working Group	Review policies and programme	29 th November
Surrey Hills Board	Agree the Consultation Management Plan arrangements	11 th December
Governance Review	Surrey Hills Board and Partners review governance arrangements for the National Landscape	Jan and Feb 2025
Management Plan Consultation	Agree process at Surrey Hills Board on 5 th March. Online-survey focused on vision and targets Targeting of Responsible Bodies, interest and amenity groups for consultation feedback	March to June
Management Plan adoption	Agreeing the changes to Consultation Draft and adoption by Local Authorities	July to September
Launch	Surrey Hills Symposium	19 th November

<u>Part of the Management Plan</u>	<u>Para/Policy</u>	<u>Comment</u>
Part 1. Introduction	Vision statement	<p>There was some confusion and overlap in having separate vision statements for the 3 themes of Thriving Plants and Wildlife; Mitigating and adapting to Climate Change; and Enhancing beauty, heritage and engagement with the natural environment. It is therefore proposed to have one Vision for the Surrey Hills, and then to have 3 mission statements to address the respective themes. The Vision statement aligns with the Defra vision for Protected Landscapes (National Parks and National Landscapes):</p> <p>The Surrey Hills is part of a coherent national network of beautiful, nature-rich spaces that all parts of society can easily access and enjoy. The National Landscape will support thriving local communities and economies, improve our public health and wellbeing, drive forward nature recovery, and build our resilience to climate change.'</p>
	Map and infographics	Map in the previous Management Plan was clearer and more detailed than the map in the update. This will be improved for the published document.
	Policy and legislative context	Legislative framework lacks detail comparative to the previous management plan. This will be improved including update on LURA Duty.
	Rural economy	Surrey Nature Partnership highlight the importance of having a healthy rural economy and a viable land management and visitor economy which should be at the heart of the vision and policies.
	Review of 2020 – 2025 Plan	To include section on progress on the previous Management Plan. Proposed to include: Impact of Covid impact on the Surrey Hills including Raised awareness of the Surrey Hills as a place for nature-based experience, particularly from London

<u>Part of the Management Plan</u>	<u>Para/Policy</u>	<u>Comment</u>
		<p>Large increase in visitor pressure particularly with dogs and activities like road cycling and mountain biking</p> <p>Transition to hybrid and online meetings</p> <p>Achievements to include:</p> <p>Natural England progress on extending the boundary</p> <p>Published Making Space for Nature – Nature Recovery Strategy as part of Defra ELMS Test and Trail</p> <p>Established Surrey Hills Farming in Protected Landscapes Programme</p> <p>Access for All programme creating easier access trails and new partnerships</p> <p>Grown social media profiles and e-newsletter from 1,200 to 15,000 distribution</p> <p>Active Surrey Hills Arts programme engaging and inspiring new audiences</p> <p>Surrey Hills Enterprises grown from circa 60 to 240 Members</p>
Part 2. The Surrey Hills National Landscape	Special qualities	<p>To provide greater clarity on how farmland contributes to the natural beauty of the Surrey Hills with greater reference to regenerative farming, grazing and opportunities for rewilding with several references re Knepp Estate and species reintroductions like Grey Partridge.</p> <p>Ref regarding the importance of chalk streams (noting that Surrey Hills streams tend to be seasonal winterbourne spring fed.</p> <p>Ref to highlight importance of ancient trees in the landscape, both the cultural and biodiversity importance.</p>

<u>Part of the Management Plan</u>	<u>Para/Policy</u>	<u>Comment</u>
		<p>Ref to importance of darker skies, rather than Dark Skies, in acknowledging the levels of light pollution affecting the Surrey Hills and that the National Landscape is not a designated Dark Skies Reserve.</p> <p>General concern about diversification having a negative impact on landscape. Natural England suggest make mention of examples of farm diversification that have led to positive landscape change e.g. eco-tourism/re-wilding projects etc. and this could be much more common in the future if farmers diversify into BNG /Natural Capital Funds/Green finance.</p>
Part 2.	2.5.7	<p>Contract farming agreements often enable a landowner's vision as opposed to compromising it. The wording of the last sentence should be adjusted to reflect the external factors that are impacting profitability (inflation, input costs, market prices, labour shortages, climate change and government policies). Propose:</p> <p>"Profitable farming can deliver investment in environmental land management whilst the decline in farming result in issues such as deterioration of woodland, scrubbing up of downland, loss of hedgerows, increased horse grazing and the loss of critical infrastructure like abattoirs that support pasture fed grazing."</p>
Part 3. Thriving Plants and Animals	Mission	<p>To re-phrase the Vision statement to a mission statement picking up on comments to provide greater emphasis on the Surrey Hills landscape character, heathland and nature friendly farming, as:</p> <p>To conserve and enhance the landscape, ensuring thriving biodiversity and harmonious coexistence between people and wildlife. Where proactive measures are taken to protect and restore our watercourses, woodlands, ancient trees, chalk downland, heathlands, and dark skies. Reviving endangered species with better connected habitats, integrating regenerative agriculture practices, and acting as custodians of the landscape. Advocating</p>

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		for more resources for nature and protected landscapes alongside collaboration across landowners, creating a vibrant natural world for all.
	Targets	<p>Wildlife Rich Habitats (deciduous woodland, PAWS restoration, Heathland and Chalk Downland) 14,560 ha to 20,000 in 2100. 5-year Plan target of additional 1000 ha. 3000 by 2042.</p> <p>Hedgerows 6,900 km to 10,000 km. 5-year Plan target of 20km</p> <p>Protected sites (SSSIs) 50% in Favourable Condition to 80%. 5-year target 60%</p>
Mitigating and Adapting to Climate Change	Mission	<p>Amend from vision to include reintroduction of species rather than new species, reference to disease and the reference to reducing carbon.</p> <p>Creating a healthier landscape with a resurgence in biodiversity, as habitats adapt to a changing climate. Where reintroduced species work alongside people as environmental engineers, as well as the removal of invasive species, and the mitigation of species disease. By working together and involving the community, we strive to make a significant impact reducing carbon emissions and planting trees to better connect woodlands, ensuring a vibrant and resilient ecosystems.</p>
	Targets	<p>Trees Outside Woodland (under 5 ha, agroforestry, hedgerows and tree belts) 2,665 ha to 4,200 ha (6.5% of land cover to 10%). 5-year Plan target of 50 ha</p>

<u>Part of the Management Plan</u>	<u>Para/Policy</u>	<u>Comment</u>
		Net Zero by 2050 (national target) -0.5 by 2075, -1.0 by 2100 Details to be in the Climate Change Action Plan in 2028.
	Reducing agricultural carbon emissions	Surrey Nature Partnership and CLA and NFU highlight that given that Surrey is the most wooded county, biofuel production and woodchip or biochar production should be supported, with any new biomass plant schemes looking to set up facilities should be supported to aid provision of green energy in Surrey. Surrey Nature Partnership points out that this could be a viable alternative to producing energy through large scale solar farms which is undesirable in the Surrey Hills Landscape
Enhancing beauty, heritage and engagement with the natural environment	Mission	Amend from vision to include sustainable active travel networks, reference to heritage, skill and the importance of setting aside areas for nature: A commitment to conserving and enhancing natural beauty, serving as a refuge of calm for people's wellbeing whilst protecting areas for wildlife. Ensuring that nature thrives alongside people, striving to make the area more accessible and welcoming, supported by improved active and sustainable travel networks. Providing greater access to environmental education and opportunities for everyone to care and be inspired by the landscape heritage supported by skills development, training, the rural economy, heritage services and the arts.
	Targets	National Heritage at Risk From 8 to 2. 5-year target 4 Easier Access Trails (surfaced, rest stops and no barriers) 8 miles to 75 miles. 5 year target 20 miles.
Part 4. The Policy Framework		
Part 4.1 Art and Culture	AC3:	"Development proposals will have due regard to the locally distinctive character of rural settlements and the setting of historic buildings" – amend the word 'will' to 'should'; this is

<u>Part of the Management Plan</u>	<u>Para/Policy</u>	<u>Comment</u>
		required as a matter of principle in local and national policy and therefore may not be necessary to include.
Part 4.1 Art and Culture	New policy	Surrey CC Heritage Services propose new Policy: Opportunities will be sought to better research, catalogue and understand the cultural, historic and landscape heritage of the Surrey Hills to ensure accurate and up to date knowledge base is available to support management and enhancement projects.
Part 4.2 - Biodiversity and Water Resources	Policy Aim	Suggest amended wording to ensure wider policy aims: Policy aim: We will enhance the biodiversity of the Surrey Hills by creating and restoring wildlife rich habitats, trees outside woodlands, hedgerows and the ensure more protected sites are in favourable condition. <u>This aim also supports the delivery of biodiversity net gain and the Local Nature Recovery Strategy.</u>
Part 4.2 – Biodiversity and Water Resources	New policy suggestion	No mention of the national mitigation hierarchy – Avoid, Mitigate, Compensate. Whilst this is a requirement of the NPPF (paragraph 193a) and generally enforced through Local Plan policies, it is a relevant consideration for the Management Plan and should be referenced to reinforce the importance and secure consistency. Suggested wording for new policy (could sit in either the planning or biodiversity policies): <u>“How schemes have considered and implemented the biodiversity mitigation hierarchy (avoid, mitigate and compensate) should be clearly set out. Where these steps have not been demonstrably followed and set out, applications should be refused.”</u>
Part 4.3 - Economy, Tourism and	E3	Referencing error – this should refer to policy P9, not P7.

<u>Part of the Management Plan</u>	<u>Para/Policy</u>	<u>Comment</u>
Community Development		
Part 4.4 Farming	F1	The CLA propose this policy should be reworded to include " Farming as a viable and sustainable enterprise, within and around the National Landscape, will be supported through the development of initiatives consistent with good management of land, where this makes a positive contribution to increasing biodiversity and conserves and enhances landscape character or where there is a requirement for necessary agricultural infrastructure or development to support a farming enterprise."
Part 4.5 Planning	Supporting text	In addition to the LURA duty, the Biodiversity Duty should also be mentioned and would appear to be relevant. This could either be mentioned alongside the planning or biodiversity supporting text.
Part 4.5 Planning	Supporting text	Not worded positively. Suggest amended wording: "This is achieved by strict robust development plan policies and through the vigilant exercise of development management powers."
Part 4.5 Planning	Supporting text	Is this the focus? Suggest amended wording: "Added to this has been the need to reverse the decline in nature in the Surrey Hills and to address in a practical local way climate change through nature, this being the a new focus of this Management Plan."
Part 4.5 Planning	Supporting text	This does not read positively and feels more like policy, rather than supporting text. Suggest amending to remove references to being resisted etc: "Some such buildings are unattractive, sometimes in a dilapidated state, but previously met functional agricultural needs. Their retention through conversion can detract from the

<u>Part of the Management Plan</u>	<u>Para/Policy</u>	<u>Comment</u>
		<p>landscape and no longer be justified for land management purposes. Such proposals should be resisted. Their existence should not be perpetuated through their conversion to other uses. For the benefit of the landscape and character The any applications for the conversion of older brick and tiled roof farm buildings or redevelopment proposals, including the conversion of stables to other uses to convert stables should be able to demonstrate that there would be no need for replacement buildings for the maintenance of the associated landscape. Similarly, the substantial works usually of temporary timber construction to other uses and the change in character, will be resisted."</p>
Part 4.5 Planning	Supporting text	<p>Suggested amendment to read more positively:</p> <p><u>"In some instances, and where needed, small scale rural exception schemes for affordable housing can be of benefit to communities. Any such schemes should come forward in accordance with local plan policies and located in or adjacent to a settlement. and where shown to be needed in a parish and/or neighbouring parishes, will be supported.</u></p> <p>Assurances <u>for delivery and retention</u> will be needed preferably through a social housing landlord and, if necessary, through a legal agreement that the occupancy of the homes would if possible be restricted in perpetuity to those <u>with a local connection (employment, family etc)</u> and in need of affordable housing. Some market housing argued to make the affordable housing viable <u>will need to be must be justified.</u>"</p>
Part 4.5 - Planning	Supporting text	<p>Wording amended for clarity. It is not the Council's intention to detract from the intent of the wording, but to clarify the position which is different from the international designation of 'Dark-Sky':</p>

<u>Part of the Management Plan</u>	<u>Para/Policy</u>	<u>Comment</u>
		<p>"Darker skies give the Surrey Hills a sense of remoteness and peacefulness. <u>Whilst the landscape does not hold the formal international Dark Sky accreditation, the skies over the landscape still</u> need to be protected for the benefit of all and future generations, for our health, wellbeing, enjoyment and to increase our understanding and sense of place in the universe...."</p>
Part 4.5 - Planning	P1	<p>Suggested amendments to simplify and ensure that the duty to conserve and enhance is shared between the applicant and the local planning authority who will actively work with applicants on this matter:</p> <p>P1. In balancing relevant planning considerations associated with determining development proposals, great weight will be attached to any adverse impact upon the amenity, landscape beauty and <u>nature rich and diverse ecology</u> of the National Landscape. and t All proposals should seek to contribute to the conservation and enhancement of the Surrey Hills National Landscape." The requirement to seek to further the purpose of conserving and enhancing the natural beauty of the National Landscape.</p>
Part 4.5 - Planning	P2	<p>Re wording suggestion: Development must respect the special landscape character and nature of the locality, particularly where development may be unduly prominent or conspicuous in views, whether this be during the day or at night, or likely to adversely affect tranquillity. Care should be taken in the use and colour of external building materials so that development is integrated into its surroundings and would not appear incongruous in its setting.</p>
Part 4.5 - Planning	P2	<p>Suggested amendment for clarity and suggested combining of P2 and P3 to avoid unnecessary duplication:</p>

<u>Part of the Management Plan</u>	<u>Para/Policy</u>	<u>Comment</u>
		<p>“Development must respect the special landscape character and nature of the locality, <u>particularly where development may be unduly prominent or conspicuous on views, whether during the day or at night, and/or where it would likely have an adverse effect on relative tranquillity. The nature and intensity of the proposed use, including the likely need for external lighting, together with the colour of external building materials must harmonise with its related landscape in order to avoid new development appearing incongruous in its landscape setting. Applications for a change of use of rural buildings will be required to demonstrate how the design respects the original rural functional character of the building.</u>”</p>
Part 4.5 - Planning	P3	<p>See comments on P2 and suggested merging of P2 and P3.</p> <p>Should P3 be retained the term ‘high- quality’ should be removed as it is subjective and emotive. The terms ‘local distinctiveness and complementary are the important words here and if a design meets those requirements, then it will usually be acceptable and no more or less is required. The same applies to the term ‘suitable’, thus suggest it is removed.</p>
Part 4.5 - Planning	P4	<p>Suggested re-wording the final sentence to reinforce the important point being made, although NFU make the point about screening also being a means to enhance the landscape and habitat creation.</p> <p><u>“Applications must be supported with additional reasoning and justification which demonstrates that development will conserve and enhance the natural beauty of the National Landscape <u>without relying upon existing trees and woodlands for screening purposes.</u>”</u></p>

<u>Part of the Management Plan</u>	<u>Para/Policy</u>	<u>Comment</u>
Part 4.5 - Planning	P4/P5	<p>It is suggested that P5 be deleted and the opening sentence be added to the end of P4. Full P4/P5 policy added below:</p> <p><u>“Applications must be supported with additional reasoning and justification which demonstrates that development will conserve and enhance the natural beauty of the National Landscape <u>without relying upon existing trees and woodlands for screening purposes. Development that would fail to conserve and enhance the natural beauty of the National Landscape, in line with national policy and the Levelling-Up and Regeneration 2023, will be resisted even when well screened.</u>”</u></p>
Part 4.5 - Planning	P6	<p>Suggest amended wording:</p> <p><u>“Farm diversification proposals will be supported where they would enable the long-term continuation of a farm holding and which bring benefits to the social and economic well-being of the local community. Any harm caused by the development must be demonstrated to outweigh by the benefits and adequately mitigated.”</u></p>
Part 4.5 - Planning	P7	<p>Suggest amended wording:</p> <p><u>“The residential or commercial conversion of redundant rural buildings of <u>substantial long-term</u> construction should conserve and enhance the natural beauty of the National Landscape and may be acceptable provided <u>the use and level of activity associated with that use would not harm the protected landscape when compared to its original use.</u> Proposals should demonstrate there will be no need <u>as a result</u> to replace any buildings to be converted in order to manage related land”</u></p>

<u>Part of the Management Plan</u>	<u>Para/Policy</u>	<u>Comment</u>
Part 4.5 - Planning	P8	<p>There was concern over this policy from the NFU and CLA, and a need to be more consistent with Local Plan policies, as such proposed wording is amended to try and seek balance:</p> <p><u>“Any development proposals to redevelop or convert farm buildings or provide for an equestrian use, that would result in farm fragmentation or other loss of the associated farmed landscape will need to demonstrate with supporting evidence that the farm remains viable and that the new use would contribute to the local rural economy. Further, in determining applications the cumulative impact on the countryside of a proliferation of buildings to support very smallholdings will also be considered.”</u></p>
Part 4.5 - Planning	P9	<p>Such developments will always have an element of harm, as such alternative wording is suggested:</p> <p>“Small scale rural exception schemes for affordable housing to be legally maintained in perpetuity, will be supported within or on the edge of rural settlements where there would be no harm to the landscape or which can be satisfactorily mitigated. provided their landscape impact can be satisfactorily mitigated “</p>
Part 4.5 - Planning	P10	Number error – there is no P10.
Part 4.5 - Planning	P11	<p>There is concern from councils and CLA and NFU that requirements are overly prescriptive and whilst understanding what is being sought, in the absence of a formal designation reference to light pollution as opposed to darker skies, should be more realistically referenced. Suggested wording tries to seek a balance:</p> <p><u>“All development proposals within the National Landscape and its setting will need to demonstrate how light pollution that could adversely affect the darkness of skies, wildlife</u></p>

<u>Part of the Management Plan</u>	<u>Para/Policy</u>	<u>Comment</u>
		<u>and habitats of the National Landscape will be avoided. This includes through the appropriate design of external lighting and measures to minimise light spill. Use of, and reference to, the guidance note published by the Institution of Lighting Professionals on the Reduction of Obtrusive Light can and should be utilised to guide and support schemes."</u>
Part 4.5 - Planning	P13	<p>Suggest amended wording for conciseness:</p> <p><u>"Development proposals outside the boundary of the Surrey Hills National Landscape must not cause harm to the setting of the National Landscape in terms of public views to or from it or generate harmful additional traffic flows along country lanes within the National Landscape."</u></p>
Part 4.6 – Recreation, Health and Wellbeing	Supporting text	<p>The following paragraph includes suggested amendments to ensure it reads more positively:</p> <p><u>" Although Whilst it is virtually not im possible to monitor the number and profile of visitors to the Surrey Hills, there is little doubt that the area receives millions of day visitors every year. In order to maximise on the contribution visitors make to the Surrey Hills. the wider Surrey economy whilst limiting the impact they have on existing infrastructure, investment is needed. Roads, local services, viewpoint conditions and capacity, bridleways and footpaths are just a few elements where the most pressure is felt and where focused investment is most needed and would ensure the balance between visitor experience, quality of life for residents and the environment can be best achieved. Without investment in infrastructure, visitors can place a great strain on the area, particularly in extremely popular small settlements with limited local services or at well known</u></p>

<u>Part of the Management Plan</u>	<u>Para/Policy</u>	<u>Comment</u>
		viewpoints. Visitors may also add to the congestion of traffic and increase the erosion of footpaths and bridleways as well as affecting the peace and tranquillity of the area.
4.7- Transport	Supporting text	"The <u>relatively</u> high car ownership contrasts with a lack of convenient public and community transport."
4.7- Transport	Policy TT2	The impact of development proposals on the surrounding Surrey Hills road network, including any highway mitigation measures, will be given great weight when assessing the acceptability of the development – overly prescriptive; consider revising text.
Part 4.8 - Woodlands, Hedgerows and Veteran Trees	General	There is no mention of specific ancient woodland of which there are several large areas of this designation within the SHNL. Although "all woodland" is said in W1 further regard to ancient woodland specifically would be beneficial.
Part 4.8 - Woodlands, Hedgerows and Veteran Trees	Supporting text	What Management Plan consultation does this refer to? Amended wording suggested: "Although the Management Plan consultation demonstrated The various consultation exercises undertaken by the Surrey Hills has demonstrated the great value that people attach to woodlands, <u>however</u> , the consequences of fragmentation and neglect include the loss of biodiversity and a perception that woodland is of little use and therefore little value."
Part 5. Delivery	NE general comments	It would be good to see references to Biodiversity Net Gain / Natural Capital funding / Green finance as mechanisms for positive change. This would sit well alongside the references to eco-agri farming that are made in part 2.
	Surrey Nature Partnership	It is unclear who the advocates are for nature, people and place and climate, I can guess but it would be useful to know which organisations are involved already. Is it one organisation that represents each of these areas.

