Tandridge District Council

Our Local Plan 2033

Examination – Note for Inspector

Note on Surrey AGLV and AONB Candidate Areas
Designation History – December 2019

December 2019
TANDRIDGE LOCAL PLAN

NOTE ON AGLV DESIGNATION

1. This note sets out the consistent basis upon which inspectors examining emerging local plans within Surrey have supported the local designation of Areas of Great Landscape Value.

2. The designation is drawn from and underpinned by the evidence base which supported the Surrey County Structure Plan. It is part of the adopted Core Strategy. The eLP describes the AGLV in Chapter 26 at paras 26.19 to 26.36 and provides continued protection for the designation in Policy TLP34. The AGLV therefore has substantial pedigree, and has been taken forward into the eLP as a designation which supports sustainable development. As para 26.25 notes, the Council’s intention is that “until the AONB review is completed, the AGLV will be retained in Our Local Plan and has remained a consistent consideration throughout the preparation of the Plan and when considering constraints”. The consistency of approach across Surrey and the implicit importance of such an approach is recognised in para 26.27.

3. The evidential justification for the inclusion of the AGLV is contained in the evidence base. It is found principally in LAN-30, which is the Surrey Hill AGLV review of 26 June 2007.
4. In addition, for example, the AGLV features prominently/significantly in many of the Landscape documents in the evidence base. The SA took into account the 2007 review as well as a wide range of other relevant landscape material: [MD-4/51/SA Obj 15 – Regional bullet points]; it discussed the AGLV specifically at [MD-4/95]. The continuing relevance of the designation and the proper reliance on the evidence base set out above are confirmed by the approach of inspectors dealing with other areas in Surrey which contain substantial swathes of AGLV.

5. The approach has not only been consistent across Surrey, but consistent in terms of the approach inspectors have taken to analysing the continuing appropriateness of the AGLV. It has 4 essential stages.

   a. The AGLV has an existing pedigree in the plan process;
   b. It is there to protect against the possibility that Natural England, in their review, may wish for elements of the AGLV to be elevated to AONB, which is a landscape of national importance afforded the highest level of protection;
   c. It is proper for the Surrey LPA’s to await Natural England’s review of the AONB;
   d. It is consistent with national policy (in particular NPPF §113) for the designation to continue.

6. What is also notable about the reasoning from each of the inspectors’ reasons is that there was no suggestion that a greater evidence base was required to justify the continued inclusion of AGLV within the plan than evidence demonstrating the local

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1 Including the district wide analysis LAN-3, LAN-4, LAN-5; the GV analysis in LAN-6; and the various settlement analysis documents in the suite LAN-7 to LAN-23 as appropriate in the northern 2/3 of the district.
pedigree of the designation (i.e. its current existence in development plan documents); and (implicitly) the evidence base that was derived from ([LAN-30]). Nor have any of the inspectors restricted the continuing protection accorded to AGLV’s to the “candidate areas”; presumably in light of the fact that final decisions have not yet been made and the precautionary approach should continue to apply.

Reigate & Banstead BC (2014) – Core Strategy

7. The inspector considered as Issue 5 whether the approach to protection of the natural and built environment is consistent with national policy. He concluded that in principle the AGLV designation was sound and consistent with national policy: IR/21/80-81. The modification he required was carried into and through the R&B 2019 examination (below).

Reigate & Banstead BC (2019) – Site allocations

8. The inspector acknowledged the importance of the role of AGLV land in this recent report. At IR/33/196 the inspector said “The Surrey Hills AONB is a landscape of national importance and in line with national policy is afforded the highest level of protection in Policy NHE1. The AGLV designation has been in place since the 1950s and provides an important buffer to the AONB protecting views from and into the area. Natural England is likely to review the AONB boundary in 2019 which may mean that areas of AGLV may thereafter be included within it. In line with CS Policy CS2, Policy NHE1 applies the same principles to the protection of the AGLV as that in the AONB until the proposed review has taken place. This would also be consistent
with other development plans in the Surrey area. I consider this approach is justified.”

9. Accordingly, again, consistency of approach across Surrey was an important factor. The inspector had no issue with the fact that the AONB review was, properly, one to be carried out by Natural England in the exercise of its functions. It is unfortunate the review has been delayed, but that has not lessened the purpose for, and reasoning behind, the protection of the AGLV. The policy formulation and approach accepted by the inspector is materially similar to the approach in the eLP; which only seeks to accord continuing weight to AGLV status until the conclusion of the AONB review.

Waverley BC (2018) – Local Plan

10. The inspector considered the AGLV designation was an important part of a suite of strong landscape and environmental protection policies: IR/11/36. He accepted it was appropriate in principle so long as the weight accorded to it was commensurate with its local nature as a designation: IR/33/137-138. In doing so, he expressly accorded weight to the consistency of approach seen in other Surrey districts with AGLV land. He found the designation was consistent with national guidance in the NPPF: IR/33/137. He took the designation into account in dealing with the proposed housing allocations: IR/21/80.

Guildford BC (2019) – Local Plan

11. The inspector dealt with the soundness of landscape etc policies as Issue 7. At IR/26/107-110 he adopted an approach consistent with his earlier approach in the Waverley eLP examination.

Document Reference TED26:
Tandridge District Council – OAN Statement of Common Ground – December 2019
Mole Valley (2009 core strategy)

12. The Mole Valley core strategy is pre-NPPF having been adopted in 2009. However, its approach to AGLV is consistent in its essentials with the approach described above, as confirmed by Policy CS13 and the supporting text at 6.4.5. Mole Valley is bringing forward a new local plan, but has not yet submitted a Reg 19 plan.

Conclusion

13. The AGLV designation has considerable pedigree and a sufficient and proportionate evidence base to support it. The principle of continuing AGLV protection until the AONB review is completed has been widely accepted by inspectors across Surrey whenever the point has been tested, both pre and post the NPPF. Policy TLP34 is consistent with national policy and makes an important contribution to a sustainable eLP.