## **Appendix 18: Ockley Low Weald**

## Please refer to Figure 26b

Additional responses from second (2024) statutory consultation are given in blue.

## Overview

Question C1: Does the Ockley Low Weald Extension Area have Sufficient Natural Beauty to be Designated as AONB?

Natural Beauty	Responses
Yes	35
No	2
Not sure	0

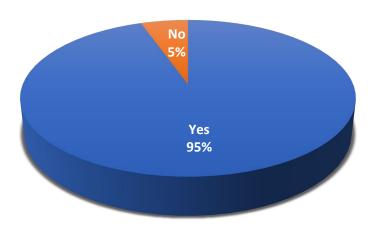
Of the 36 respondents who answered Question C1, 34 respondents (95%) felt that the Ockley Low Weald Extension Area has sufficient natural beauty to be designated as AONB.

In contrast, 2 respondents (5%) felt that the Ockley Low Weald Extension Area does not have sufficient natural beauty to be designated as AONB.

Arguments setting out the desirability of designating this land focused on increased protection and health and wellbeing, while reasons for not

designating this Extension Area focused on regulatory burden. These are considered in Appendix 2.

Ockley Low Weald - Sufficient natural beauty to be designated



Question C5: Do you agree with the proposed boundary for the Ockley Low Weald Extension Area?

Boundary	Responses
Yes	5
Yes, but I wish to suggest an alternative	28
No	7
Not sure	0

Of the 40 respondents who answered Question C5, 5 respondents (12%) agreed with the proposed boundary for the Ockley Low Weald Extension Area and 7 respondents (18%) did not.

28 respondents (70%) agreed but wished to suggest an alternative boundary for the Extension Area, many providing supporting evidence.

Responses associated with the inclusion of land south of Vann Lake comprised a number of identical submissions and boundary maps.

The additional areas of land that respondents wish to see included within the proposed extension are:

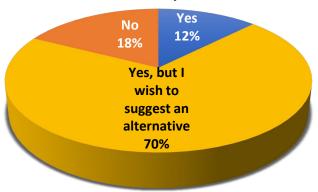
- Land south of Beare Green (between railway and A29/A24)
- Land east as far as the railway
- Land west of Weare Street and north of Vann Lake Road
- Land south of Vann Lake
- All of Ockley Parish
- Land as far south as Pisley Lane
- Land to the south to include Okewood Hill and Wallis Wood
- Ewhurst and setting
- Land east of Ewhurst

Land east of Cranleigh

The areas of land that respondents wish to see excluded from the proposed extension are:

- Ockley Village and Ockley Court
- Land west of Ewhurst at Thornhurst Brook Farm

Ockley Low Weald - Agreement with the proposed boundary



During the second (2024) statutory consultation, responses were received regarding Addition 17: Land at Ockley Court SNCI, Addition 18: Land north of Vann Lake Road, Addition 19: Land north of Pisley Lane and Addition 20: Land west of Plough Lane, as well as Deletion 10: Land west of railway and Deletion 11: Land north of Thornhurst Brook Farm. Natural England has reviewed these responses and provided further commentary in blue below.

Natural Bea	Natural Beauty		
<u>Theme</u>	Representations	Natural England Commentary	
The proposed extension meets the Natural Beauty Criterion	The majority of respondents agreed that the proposed extension met the Natural Beauty Criterion  ANON-VUXE-WS1W-T (Waverley Borough Council)  'Waverley also broadly supports the specific areas within Waverley proposed for inclusion in the AONB. The Council agrees with the accompanying assessment that the quality of the proposed areas is of sufficient natural beauty to be included in the AONB.'  ANON-VUXE-WEZ7-N (Mole Valley District Council)  'The Council agrees that this area has sufficient natural beauty and should be designated in accordance with the principles set out in Chapter 6 of Natural England's Guidance on Assessing Landscapes for Designation (June 2021).'  ANON-VUXE-WS1V-S  '[Anon] is in favour of the Ockley Low Weald (EA12) proposed AONB expansion.'  ANON-VUXE-WSQC-6  [Anon] supports the proposed Ockley Low Weald Extension to the Surrey Hills AONB.'  ANON-VUXE-W5RF-C  'I often cycle and walk around this area along quiet lanes, where there are small hedge-lined fields, copses and lots	Natural England agrees that land within the proposed Extension Area meets the natural beauty criterion for designation as AONB and that additional evidence provided by respondents supports the findings of the Natural Beauty Assessment.  Natural England has also taken account of detailed responses requesting changes to the boundary and proposes some amendments. These are set out below.	

Natural B	Natural Beauty	
<u>Theme</u>	<u>Representations</u>	Natural England Commentary
	of wildlife. The majestic views of the Surrey Hills from the lanes and villages make this a particularly beautiful area, and indeed the views from the hills of this ancient landscape is very special. The area has benefitted from having soil that is not good for growing arable crops, and so it has retained its small fields more suitable for animal agriculture. It is distinctive compared with other parts of the UK and is worth preserving into the future for people and for wildlife.'	
	ANON-VUXE-W5R4-T 'It includes two wonderful local nature reserves. The whole area is lovely, nestled in the shadow of the Greensand Hills.'	
	ANON-VUXE-WEAD-9  'I agree that it is appropriate to extend the boundary to include this area. It contains multiple areas of ancient woodland, Vann Lake and its tributaries and waterways are of particular importance, and the area has clear views extending towards Leith Hill and the existing AONB.'	
	ANON-VUXE-WEU4-D  'Currently, this is designated as an Area of Great Landscape Value (AGLV). It provides virtually uninterrupted views towards, and into an area of outstanding natural beauty. This includes views towards Holmbury Hill, Pitch Hill and Leith Hill. It also contains its own unique landscape including ancient woodland, pasture and the historic village settlement of Ockley nestling below Leith Hill. Further it has the classic English parkland setting of Jays Park evocative of many of the great English houses from the 17th – 19th century. It also	

Natural E	Natural Beauty		
<u>Theme</u>	Representations	Natural England Commentary	
	contains sites of special scientific interest plus areas protected by the Surrey Wildlife Trust. It is unusual that such a vista exists providing uninterrupted views into an AONB and thus in effect a landscape of natural beauty continuum. I believe this is a very positive proposal for the protection of a unique landscape with evidence of historic human development and links to the countryside over centuries. An important factor is access to dark skies. Despite its proximity to large urban areas and a major airport, the skies in this area are remarkably dark with the Milky Way clearly visible on a clear winter's night. Much of this is due to the lack of street lighting within the proposed ANOB.'  ANON-VUXE-WEMX-9 'I agree with the rationale presented in the review reports.'		
	ANON-VUXE-WEE4-W 'The Ockley area is complimentary to, and a natural extension to the landscape and beauty to the south of the Surrey Hills.'  ANON-VUXE-WEX3-F		
	'This has been well explained in the consultation document and I fully agree with it.'		
	ANON-VUXE-WECZ-1		
	'Oh so many reasons. Extraordinary views into what is already designated an AONB. The area itself is as stunning as the designated AONB. Woodland, farmland,		

Natural E	Natural Beauty	
Theme	Representations	Natural England Commentary
	rolling hills - Holmbury, Pitch and Leith. It is peaceful. People visit from afar. I meet many people on my walks. It also has areas of Special Scientific Interest as well as locations protected by the Surrey Wildlife Trust.	
	Ancient trees, wild flowers. A veritable haven that needs to be protected, please. There is no light pollution here as there is no street lighting. The area is renowned as an exquisite 'dark sky' area, which is so rare. It must be protected both for the countryside and for people's wellbeing. Both those who live here and who travel to benefit from the area.'	
	ANON-VUXE-WE9W-M	
	'I agree with all the reasons given in the Natural England Consultation document.'	
	ANON-VUXE-WEAB-7	
	'The scenic quality of the village [Ockley] excite the senses and conveys a peaceful feeling to the visitors, hence why many hikers, cyclist and outdoor life lovers can be spotted around the village every weekend. Numerous public footpath and bridleways are available to enjoy the countryside including ways to the top of Leith Hill.	
	The wildness is lush and thriving thanks to the vast amount of fields, both agricultural and woodlands. There are ancient woodlands around Ockley with several trees that are eligible to be listed within the Ancient Tree Inventory, the proposed AONB extension would ensure that these over 200 year old trees are no longer at risk.	

Natural Bea	Natural Beauty		
<u>Theme</u>	Representations	Natural England Commentary	
	Various species find within the Ockley Low Weald their perfect nesting place such as red kites, buzzards, barn owls, voles, grey long-eared bats, dormice, hedgehogs and all the species are helped by the darkest level of dark skies within the CPRE light pollution map.'		
The proposed extension does not meet the Natural Beauty Criterion	ANON-VUXE-W5T8-Z considered the area to not meet the Natural Beauty Criterion, although no justification was given.  ANON-VUXE-WEUH-1 Gave a variety of reasons for why land in the vicinity of Ockley and Ockley Court did not meet the Natural Beauty Criterion which are summarised below:  • HDA study did not identify the area in Ockley as qualifying for AONB designation • The justification to assess areas outside of the AGLV as a result of the 'call for evidence' does not provide the evidence submitted or any clear rationale.  • Land is proposed for designation which has not been assessed in the Natural Beauty Assessment and which lies beyond the AGLV (e.g. land east of the A29) • Ockley Court is neither in the Green Belt or AGLV • Ockley Court lies at the edge of a transitional landscape • Development within Ockley should be considered incongruous development and the edge of the settlement is a hard edge to the adjoining landscape	Natural England does not agree that the proposed Extension Area lacks natural beauty.  These issues raised by ANON-VUXE-WEUH-1 are considered in detail in relation to the request to exclude land in the Ockley and Ockley Court area (see below).	

Natural Beauty		
<u>Theme</u>	Representations	Natural England Commentary
	Not clear what happens to areas which are AGLV but remain outside of the proposed AONB extension – confusing.	

Boundary	Boundary		
Theme	Representations	Natural England Commentary	
General agreement with proposed boundary	ANON-VUXE-WS1W-T (Waverley Borough Council)  'Waverley also agrees that the proposed boundaries for extending the AONB are logical and adhere to the principles for setting an AONB boundary. However, this view is based on a high-level assessment of the proposals and therefore it is appreciated that our local communities will have more detailed knowledge of their areas. As such, where our local communities have some concerns about the details of the boundaries on the ground or that in some cases, feel that additional land should be proposed for inclusion in the AONB, we would urge Natural England to carefully consider their representations.'  ANON-VUXE-WEU4-D  'The proposed new boundary represents a cut off at a point from which such views are either very distant, non-existent or less obvious. The proposed boundary looks logical.'  ANON-VUXE-WECZ-1  'I believe the proposed boundary looks good.'	Commentary  Natural England notes the support for the proposed boundary and has provided a detailed commentary to the issues raised by other respondents which can be found below.	

Boundary		
Theme	Representations	Natural England Commentary
Requests for Ad	ditional Areas	
Include land south of Beare Green between railway and A29 and A24	ANON-VUXE-WEZ7-N (Mole Valley District Council), ANON-VUXE-WMXA-5, ANON-VUXE-WEC8-Y, ANON-VUXE-WEX3-F  Reasons given include:  Natural Beauty:  AONB boundary along railway predates construction of A24  Land between railway and A24 has intrinsic qualities  Same character and scenic quality as the AONB  across and stream creates visual appeal  Fields and farm buildings are highly visible from the A roads  Development does not intrude and strong sense of remoteness and tranquillity  Setting to AONB and Beare Green  Area with easy access by the local community  Integral part of the view from the AONB.  Desirability:  Risk of land being developed for housing  To protect views in and out of the AONB  Importance of area for recreation.	Commentary This area was considered in the Natural Beauty Assessment Report as part of EA12 which was extended following the 'Call for Evidence' where submissions were received regarding land south of Beare Green.  However, this area was not included within the proposed Candidate Area as shown on Figure 11.12. The Natural Beauty Assessment Report states at page 175 that 'In the east the cumulative effect of transport infrastructure including the A29, Horsham to Dorking railway line, and A24, causes fragmentation.' And 'East of the Horsham to Dorking railway, the landscape becomes fragmented.' It goes on to state at page 177 that 'This sense of being away from activity and business is undermined in the east by the A24 and Horsham to Dorking railway' It concludes on page 179 that 'In the east the landscape is less topographically varied and is fragmented due to infrastructure and development.'  Natural England has reviewed this area which lies between the railway and the A24/A29. The land is gently undulating, dissected by a minor stream. It includes the Great Turners Wood SNCI in the north of the area and two small areas of ancient woodland with bluebells and 6-7 arable fields. The fields comprise large irregular assarts with wavy or mixed boundaries and a former area of parkland associated with Arnolds (including a linear lake) which has since been converted to arable farmland. There are no listed buildings. From the public right of way, vehicles are visible on the A29 and associated with the A24 junction and there is considerable traffic noise. The railway is on an embankment through the southern part of this area and forms a considerable feature in the landscape, separating this land from the rising slopes of the AONB beyond. Views to the rising slopes to the west increase scenic qualities, but the landscape itself is transitional. Natural England is of the view that drawing the boundary along the A29 and A24 would be at the lower quality end of the transitional landscape and not in accordance with Natura
	Boundary:	this area of land.

Boundary		
Theme	Representations	Natural England Commentary
	Follow the A24 and A29. This is considered to be a minor boundary refinement. The land relates to the AONB, forms part of a sweep of qualifying land and a suitable alternative boundary exists.	Given that the existing AONB boundary follows the railway, which is a clear feature on the ground, Natural England considers that there should be no change to the boundary in this area. This will not alter the fact that this land clearly forms part of the setting to the AONB.
		Conclusion No change.
Extend proposed boundary east to the railway including land in the north (immediately south of Bognor Road) and in the south (land immediately north of Cole's Lane).	ANON-VUXE-WEZ7-N (Mole Valley District Council), ANON-VUXE-WEAP-N and ANON-VUXE-WEV7-H  Reasons given to include northern area:  • Land shares the same characteristics as the AONB.  • Includes Mountriden Copse, Park Copse, Garden Copse and Alder Copse.  • The Kit brook watercourse continues through this area and there are several bodies of water.  • The Ockley Copse SNCI is also adjacent to the area to the south.  • Area is not fragmented by road network or railway.  • Predominately agricultural and undeveloped.	Commentary  This area was considered as part of EA12 in the NB Assessment and was included in the Candidate Area for designation.  Respondents have sought a consistent approach to the definition of the boundary along the eastern edge citing the use of the railway as a more robust feature.  To ensure a consistent approach, NE has reviewed the whole of the proposed boundary between Bognor Road and Cole's Lane.  In the northern area NE acknowledges that the proposed boundary excludes a section of Kit Brook as well as part of the Ockley Court SNCI and that in this area there is also ancient woodland and the historic route of Green Lane (public right of way). NE has also found that this area of land is transitional – influenced by domestic landscaping, lack of management and noise intrusion given the proximity of the A29 and A24. NE considers there is a case to include the whole of the Kit Brook and SNCI within the designation but does not consider that the boundary should be drawn as far as the A29 and railway.
	Reasons given to include the southern area:	NE has gone on to reconsider the boundary immediately to the south. This area of land has been included given its undulating qualities and deeply incised wooded gills including Holms Gill and Holmswood Gill and the distinctive collection of historic listed buildings at Ockely Court including barns, farm house, ice house, Grade II* church and Ockley Court manor house which contribute to the natural beauty of the area. Rising

Boundary		
Theme	Representations	Natural England Commentary
	<ul> <li>Densely treed or bounded by linear woodland.</li> <li>Undeveloped with feeling of relative wildness and tranquillity.</li> <li>Shares the same characteristics as land included.</li> <li>Coherent with the land surrounding it and not fragmented.</li> <li>Ancient woodland.</li> </ul>	land to the east of Holmswood Gill affords views over the wooded gills to the rising Greensand Hills beyond forming attractive compositions. Nevertheless, this land is transitional and closer to the railway the land is more affected by noise from the A24, railway and a mast at Ockley station. Whilst the railway line was identified as a suitable boundary there are other features which could be used allowing the boundary to be drawn more conservatively. On balance Natural England has concluded that the boundary should be drawn back closer to the higher end of the transition by adopting field boundaries and a farm track and including the Holmswood Gill and excluding land on the margins, closest to the railway line.
	Benefit it will have not just to the wider AONB, which will flow better and be more justifiably continuous, but also for the wider environmental benefits it will bring for biodiversity and in sustaining and conserving existing tranquillity.     Management schemes and regulation of the wider land should be consistent. Given the similar characteristics of this area and the AONB.     Exclusion may well result in detrimental outcomes to land management, biodiversity and the wider area. It would be logical to include the parcel at the very least to avoid any such risks.  Proposed boundary:	For similar reasons Natural England considers that the proposed boundary along Cole's Lane forms a clear feature within the transition and inclusion of land to the east is not justified given the transitional nature of the landscape and ability to define a clear boundary more conservatively.  Therefore, Natural England has not proposed the use of the railway as the boundary in this section. NE does not define a boundary simply because of the way it looks on a map.  Natural England does not consider that the proposed boundary would result in detrimental outcomes to land management. These desirability issues are discussed in detail in Appendix 2.  Conclusion  Minor addition to include Ockley Court SNCI.  Minor deletion to exclude land adjacent to the railway.  (Addition 17 – Refer to Figure 26b)  (Deletion 10 – Refer to Figure 26b)
	Unclear why Natural England has not extended the boundary to the railway line to the east to include	

Boundary	Boundary		
Theme	Representations	Natural England Commentary	
	the woodlands and bodies of water. The railway line acts as a clear boundary.		
	Using the railway line for the proposed boundary amendment would be more coherent and act as a very clear boundary, as would Coles Lane to the south.		
Support for proposed Addition 17: Land at Ockley	59 respondents agreed with the designation of Addition 17 and only two provided a reason for their view as follows:	Commentary  Natural England acknowledges support for this addition.	
Court SNCI	ANON-PQ5Q-KRRC-S (Mole Valley District Council)	2 respondents disagreed with the designation of Addition 17 but provided no reason for their view.	
	'Yes, the Council agrees that this should be designated as part of the Surrey Hills National Landscape [AONB].	1 respondent wished to comment on the boundary but did not provide a comment.  Natural England note therefore, that there are no responses specifying a change to the boundary in this area.	
	While it is unfortunate that the full extent of the Council's suggested amendment submitted at the initial consultation has not been accepted, it is considered that the methodology has been applied correctly and is consistent with other areas. It recognises the fragmented nature of the wider parcel, the presence of built form and the impacts upon tranquillity from the adjacent railway line. The Council welcomes the addition of the Land at Ockley Court SNCI as shown on Map 26b, reference A17.'	Conclusion No change.	
	ANON-PQ5Q-KR3Y-G (Waverley Borough Council)		
	'Waverley Borough Council broadly supports the specific areas within Waverley that are proposed to be in addition to those areas that were proposed		

Boundary	Boundary		
<u>Theme</u>	Representations	Natural England Commentary	
	for inclusion in the AONB in the first consultation that ran from March to June 2023.		
	Waverley also agrees that the proposed boundaries for extending the AONB are logical and adhere to the principles for setting an AONB boundary. However, this view is based on a high-level assessment of the proposals and therefore it is appreciated that our local communities will have more detailed knowledge of their areas. As such, where our local communities have some concerns about the details of the boundaries on the ground or that in some cases, feel that additional land should be proposed for inclusion in the AONB, we would urge Natural England to carefully consider their representations.'		
Support for the proposed	Of the 35 responses received for this area, only two provided a reason for their view as follows:	Commentary	
Deletion 10	ANON-PQ5Q-KR3Y-G (Waverley Borough Council)	Natural England acknowledges the support for this deletion.	
	'Waverley also broadly supports the deletion of those specific areas that were originally proposed for inclusion in the AONB in that first consultation. The Council agrees with the accompanying assessment	Natural England notes that there are no responses specifying a change to the boundary in this area.  Conclusion No change.	
	Waverley also agrees that the proposed boundaries for extending the AONB are logical and adhere to the principles for setting an AONB boundary. However, this view is based on a high-level assessment of the proposals and therefore it is appreciated that our local communities will have		

Boundar	Boundary		
Theme	Representations	Natural England Commentary	
	more detailed knowledge of their areas. As such, where our local communities have some concerns about the details of the boundaries on the ground or that in some cases, feel that additional land should be proposed for inclusion in the AONB, we would urge Natural England to carefully consider their representations.'		
	ANON-PQ5Q-KRRC-S (Mole Valley District Council)		
	'The Council notes NE's suggested approach to remove this area of land, closest to the railway line, from the proposed boundary. It notes that this is not an amendment to the existing SHNL [Surrey Hills AONB] boundary, but to the proposed area suggested by NE as part of the variation project. While the Council would of course wish to maximise the area of land which is included within the SHNL [Surrey Hills AONB] for the benefit of the landscape, wildlife and communities, it accepts that the deletion would provide a more robust boundary ensuring a consistent approach to assessment. To include an area which conflicts with the methodology would undermine the overall aims of the process.'		

Boundary	Boundary		
<u>Theme</u>	Representations	Natural England Commentary	
Include land west of Weare Street and north of Vann Lake Road	ANON-VUXE-WEV7-H Reasons include:	Commentary  Natural England acknowledges that this area contains a continuation of ancient woodland at Kiln Wood. However, it does not split Weavers Wood SNCI which is wholly included within the proposed boundary.  The land north of Vann Lake Road includes an area of former parkland including some veteran trees within grassland. This land is elevated with some glimpsed views to the Greensand Hills in the distance.  Natural England agrees that the area of ancient woodland and remnant parkland north of Vann Lake Road could be included within a proposed boundary and that Vann Lake Road itself makes a more robust boundary which still enables residential development to the east to remain excluded.  Conclusion  Minor addition to include former parkland on elevated land with boundary drawn along the backs of properties and along Vann Lake Road.  (Addition 18 – Refer to Figure 26b)	
Support for proposed Addition 18: Land north of Van Lake Road	58 respondents agreed with the designation of Addition 18, and some provided a reason for their view.  Statutory Consultee responses included:  ANON-PQ5Q-KRRC-S (Mole Valley District Council)  'Yes, the Council agrees that this should be designated as part of the Surrey Hills National Landscape.  It is considered that the methodology has been applied correctly and is consistent with the	Commentary  Natural England acknowledge the support of the Local Authorities and the reasons given for this addition.  3 respondents disagreed with the designation of Addition 18, but provided no reason for their view.  1 respondent wished to comment on the boundary, however, they did not provide a comment. Natural England notes therefore, that there are no responses specifying a change to the boundary in this area.	

Boundar	Boundary		
Theme	Representations	Natural England Commentary	
	assessment of other areas. The Council welcomes the addition of the Land north of Vann Lake Road as shown on Map 26b, reference A18 which includes the established ancient woodland and long-distance views to the Greensand Ridge.'	Conclusion No change.	
	ANON-PQ5Q-KR3Y-G (Waverley Borough Council)		
	'Waverley Borough Council broadly supports the specific areas within Waverley that are proposed to be in addition to those areas that were proposed for inclusion in the AONB in the first consultation that ran from March to June 2023.		
	Waverley also agrees that the proposed boundaries for extending the AONB are logical and adhere to the principles for setting an AONB boundary. However, this view is based on a high-level assessment of the proposals and therefore it is appreciated that our local communities will have more detailed knowledge of their areas. As such, where our local communities have some concerns about the details of the boundaries on the ground or that in some cases, feel that additional land should be proposed for inclusion in the AONB, we would urge Natural England to carefully consider their representations.'		

Include land to AN	<u>epresentations</u>	Natural England Commentary
		Natural England Commentary
	NON VIVE WEAD N. ANON VIVE WELLA	
Vann Lake including AN AN AN AN AN	NON-VUXE-WEAP-N, ANON-VUXE-WEU1-A, NON-VUXE-WE6T-E, ANON-VUXE-WEMX-9, NON-VUXE-WEE4-W, ANON-VUXE-WEC7-X, NON-VUXE-WEBJ-G, ANON-VUXE-WEX4-G, NON-VUXE-WEQR-7, ANON-VUXE-WEC4-U, NON-VUXE-WEBU-U, ANON-VUXE-WEBX-X, NON-VUXE-WEBZ-Z, ANON-VUXE-WEU1-A, NON-VUXE-WEEF-F, ANON-VUXE-WEAD-9  easons given include:  atural Beauty:  Boundary splits settlement (excluding 5/6 cottages south of the village) and contrary to Natural England Guidance.  Houses are within the 30mph speed limit and Ockley village signage.  Current boundary splits 6 houses from village of Ockley – unnatural division of the community of Ockley.  Identical in nature to that included – arable fields backed by ancient woodland  Intervisibility with Leith Hill.  Birches Wood has carpets of bluebells, veteran oaks and beech trees (part of Vann Lake and Ockley Woods SSSI).  Birches Wood, Holbrook Wood, Wickney Holt and Weaver's Wood represent a single, unbroken stretch of ancient woodland.	Commentary  The two key issues put forward by respondents revolve around: a) splitting of a settlement/community b) exclusion of land that has the same or similar qualities as land which is included for designation.  Land east of Ockley formed part of the Candidate Area following the Natural Beauty Assessment. This Assessment highlighted the following:  'In the fringes of this Candidate Area, landscape character and scenic quality is changing, as a result of distance from the rising Greensand Hills and declining topographic variation, as well as changes in land use and woodland management. The extent of the Candidate Area has been drawn to exclude those areas where the change is sufficiently evident for the landscape to not meet the Natural Beauty Criterion. However, changes in landscape qualities and scenic qualities are not abrupt. Therefore, the definition of the Candidate Area shows broad areas which may qualify for designation, and a detailed boundary line may be drawn within, or relatively close to this area, recognising that the definition of a boundary in this landscape is likely to be challenging.'  At the boundary assessment stage the Boundary Report states: 'Careful consideration has been given to those factors which are judged to lift the qualities of the landscape above ordinary or attractive countryside. Land close to the AONB is most influenced by the presence of the rising hills at Leith Hill and Holmbury Hill, which are seen as a backdrop in views, and lift scenic qualities of the area. Small knolls of higher land create topographic variation and interest and steep wooded ravines also add variety and texture. The intact pattern of small-scale pastures defined by thick hedgerows and linear woodlands add a sense of longevity, along with vernacular farm buildings. Where these factors come together, the natural beauty of the landscape is considered to be high.'

Boundary		
Theme	Representations	Natural England Commentary
	<ul> <li>Include the streams and gullies leading from Vann Lake.</li> <li>Distinct change in the landscape south of Poundgate.</li> <li>Proposed boundary is divisive, unnatural and clunky.</li> <li>Boundary is visually complicated.</li> <li>Proposed boundary separates Vann Lake from Birches Wood and follows a footpath which is not in active use.</li> <li>Desirability:         Need for protection of natural elements which is the core character of Ockley rural village.     </li> <li>Boundary:         Two alternative boundary suggestions have been put forward. The first follows the tree line and footpath, south of Poundgate/Birches Cottages. This boundary is regarded as a clearer, legible gateway into the AONB due to the change in character. It avoids splitting the dwellings from the rest of the village. The second boundary lies slightly further to the south to include the whole of the SSSI and Holbrook Wood. The boundary follows roads and bridleways.     </li> </ul>	The six houses referred to by respondents are not within the Ockley Conservation Area and the settlement does not have a defined boundary in the Mole Valley Local Plan. These dwellings sit remotely from the main settlement and are not of special architectural merit. Nevertheless, they do lie within Ockley Parish and residents feel part of the wider Ockley community. Appendix 4 of the Natural England Guidance is clear that whilst towns and villages should not normally be cut in two by a National Park /AONB boundary, a settlement does not equate to a parish and the division of parishes is acceptable in drawing a boundary. Furthermore, Ockley Parish has started preparation of its Neighbourhood Plan and has undertaken a landscape appraisal (February 2022). This places the six houses in character area A4 (land lying to the south of the village mainly to the east of the A29). This area is distinguished from area C2 Cathill Lane to School Lane which is considered to comprise the village.  The southern boundary sought to include the high point or hill at Friday Street and also the restored smock mill (Elmers Mill), which sits on a prominent hill and acts as a local landmark. These hills, to the east of the village of Ockley, form an important and highquality setting to the village. South and east of the windmill the landform becomes less distinctive, and views to the Greensand Hills to the north less frequent and more distant. The boundary was drawn to the edge of the start of woodland and sought to include Vann Lake where scenic quality is high as a result of the combination of open water and woodland. South of this, Natural England is aware that the woodland continues and comprises ancient woodland (albeit with some areas of conifer plantation) and deep-set ravines and small streams with natural heritage interest. Nevertheless, Natural England took the view that these woodlands are not uncommon within the Low Weald landscape and that further south the land loses its connections to the Greensand Hills and is increasin

Boundary		
<u>Theme</u>	Representations	Natural England Commentary
		to split the SSSI designation, and result in the boundary being drawn at the outer edge of the transitional landscape, adjacent to non-qualifying land.  Conclusion No change.
whole of Ockley Parish  C di N C A C A A A	ANON-VUXE-WS1V-S, ANON-VUXE-WEMN-Y, ANON-VUXE-WEAB-7, ANON-VUXE-WEAD-9  Concern was raised regarding perceived discrepancies and inconsistencies between the Natural Beauty Assessment Report and Boundary Considerations Report (the Natural Beauty Assessment describes the justification for the Candidate Area but not the proposed Extension Area). Furthermore, reference was made to the A28 and not A29 in the Natural Beauty Assessment table for Ockley Low Weald.	Commentary  Natural England acknowledges that there is a difference in the extent of the Candidate Area following the Natural Beauty Assessment and the proposed boundary which lies further to the south. Natural England agrees that Natural England Guidance usually seeks to define a boundary within a Candidate Area. However, at Ockley and Ockley Court, assessment notes the particularly challenging aspects of defining a boundary within a transitional area, especially where the Natural Beauty Assessment has identified features of interest beyond the Candidate Area. For these reasons, at the boundary setting stage, areas were reviewed, and in this instance, it resulted in the boundary being defined further to the south beyond the Candidate Area. Natural England does not regard this as a discrepancy and has sought to provide an explanation for these judgements. Given the responses to the Statutory Consultation, these areas have been further reviewed and are discussed below.  Natural England notes the typo in the Natural Beauty Assessment Report which refers
	<ul> <li>Part of the Parish is within the AONB while the remainder is not, despite substantially identical morphological and topographical aspects.</li> <li>Parish contains ancient woodland, agricultural land, SSSI at Vann Lake, darkest skies and listed buildings.</li> </ul>	Natural beauty is not an assessment on morphological and topographical aspects alone. In this area of Ockley Low Weald, the Natural Beauty Assessment Report makes it clear that the landscape is transitional, moving away from the Greensand Hills. The areas which are considered to qualify for designation lie closest to the Greensand Hills, have visual connections and express topographic variation in the form of low hills which contribute to scenic qualities and natural beauty and/or include a number of natural and cultural heritage features. Natural England agrees that there are features of interest including ancient woodland and heritage assets beyond the proposed boundary within the wider Low Weald landscape, however Natural England has sought to draw

Boundary	Boundary		
Theme	Representations	Natural England Commentary	
	Archaeological Potential (AHAPs) due to Roman Road (A29).  Beginning of Surrey, as indicated on road signs is also the beginning of the Surrey Hills AONB.  Part of the Parish is AGLV and should be upgraded to AONB.  Parish Boundary is 100m from the proposed boundary.  Boundary: No specific boundary is proposed but the submission implies that the respondent wishes to see the whole of the Parish included, as it is substantially identical.  Respondents also consider that including all of the Parish would unify geomorphological aspects to the administrative one.	the boundary conservatively within the transition including those areas of greatest interest and scenic beauty, which links closely to topographic variation and visual links to the Greensand Hills. Wherever possible, the boundary has utilised historic lanes and routes.  The archaeological potential of an area is not generally considered to contribute to natural beauty given it relates to aspects of landscape which are not visible or known.  Natural England does not agree that the Surrey County Boundary or road signs signify the start of a national landscape designation. The identification of land suitable for	
		designation as AONB must be based on its natural beauty in accordance with the wording in statute and Natural England Guidance.  Natural England acknowledges that this area of the Low Weald is recognised as AGLV but, as noted in the Natural Beauty Assessment, this does not necessarily equate to a landscape of national significance. It is for this reason that the landscape is assessed	
		afresh against the natural beauty factors as set out in the Natural Beauty Assessment Report. In any event, land which is AGLV within Ockley Parish is proposed for inclusion within the AONB extension.  When defining a boundary, consideration is given to the suitability of including	
		settlements and also the integrity of settlements. Consideration is given to avoiding the splitting of settlements by a boundary. However, the Natural England Guidance goes on to make a distinction between parishes and settlements stating 'A settlement does not equate to a parish and the division of parishes is acceptable in drawing a boundary.' Natural England is therefore of the view that the proposed boundary, which does not include all of Ockley Parish, is not contrary to Natural England guidance.	
		The Parish Boundary is noted as extending as far south as the County Boundary and is not 100m from the proposed boundary extension, as suggested by some respondents.	

Boundary		
<u>Theme</u>	Representations	Natural England Commentary
		Natural England notes that this may indicate confusion between parish and settlement boundaries.
		Conclusion No change.
Extend boundary south as far as Pisley Lane	ANON-VUXE-WEZ7-N (Mole Valley District Council), ANON-VUXE-WEU4-D Reasons given include:  Natural Beauty:  Landscape features. Farmland and agriculture. Comparable natural beauty to the land which surrounds it. Established woodland – some ancient. Equestrian land use at Jordans Farm and associated development is localised and visually contained. Includes part of the Forest Green. Conservation Area. Undeveloped. Current land uses are sporadic and lower density development compared to other area such as Betchworth and Ockley.  Desirability: Benefit to wider AONB and local heritage value. The inclusion of this land would ensure the revised AONB would flow better around Forest Green and Ockley village, securing	Commentary  The Natural Beauty Assessment concluded that 'This landscape has many features of cultural and natural heritage and forms attractive countryside with the strongest weight of natural beauty evidence evident to the north, in land closer to the existing AONB. Here the landscape has the greatest topographic variation and when combined with land use patterns, creates scenic compositions.  Views and vistas benefit from the relatively close backdrop of the Greensand Hills to the north, which lift the area's natural beauty, and this declines to the south with increasing distance and woodland cover, despite cultural and natural heritage interest remaining high. In addition, relatively high levels of tranquillity mean there is a strong case for including the northern parts of the area. There are however patches of lesser quality landscape southeast of Forest Green where intensive farming is more prevalent and care will be needed in defining a boundary which includes areas of highest quality.  To the south, the Candidate Area has been drawn to include some features such as the sculpture garden and Ockwood Church, but care will be needed at the boundary setting stage when defining a boundary within this transitional landscape. Similarly, to the west, the landscape is also in transition and lacks the drama found to the north, and whilst there are areas where natural beauty is higher, such as parkland landscapes, these areas are separated by lesser quality land. In the east the landscape is less topographically varied and is fragmented due to infrastructure and development.'  In defining a boundary, Natural England has given consideration to features of interest including areas of ancient woodland and landscape features. Natural England also acknowledges that given the transitional nature of the landscape land uses and natural

Boundary		
<u>Theme</u>	Representations	Natural England Commentary
	one continuous landscape designation, as opposed to two forks with an incongruous gap in the centre.  • Would also bring wider environmental benefits for biodiversity and sustaining and conserving tranquillity.  • Management schemes and regulation of the wider land should be consistent given the similar characteristics of this area and adjacent proposed extension.  • Exclusion may well result in detrimental outcomes to land management, biodiversity and the wider area. It would be logical to include the parcel at the very least to avoid any such risks.  Boundary:  The current boundary appears arbitrary. A suggested alternative boundary is to follow the northern edge of Pisley Lane and then the northern edge of the byway to Horsham Road.  Respondent VUXE-W5RS-S also wished to see this area included but the boundary extended slightly further south between Mayers Green and Cathill Lane.	beauty, the land may appear comparable either side of the boundary – this is not unusual as natural beauty rarely changes abruptly. Natural England Guidance is clear that, in an area of transitional landscape, the boundary must be drawn 'towards the high-quality end of the transition in a manner that includes areas of high-quality land and excludes areas of lesser quality land, ie it should be drawn conservatively. Visual associations may also be used to help define the extent of land for inclusion in these circumstances.'  More specifically the Natural Beauty Assessment Report noted that 'In some locations the landscape has been subject to more intensive arable farming, where hedgerows appear well trimmed and there is a higher incidence of modern farm buildings southeast of Forest Green e.g. Jordans Farm.'  Nevertheless, this area was included in the Candidate Area given the features of interest to the south including ancient woodland, Hannah Peschar Sculpture Garden and Ockwood Church. Noting that 'Particular scrutiny will be required in transitional areas to the south, when defining a detailed boundary to the Candidate Area, as well as in areas where landscape condition has declined as a result of intensive farming.'  In the area of Pisley Lane, Natural England acknowledges that the landscape expresses typical Low Weald characteristics. As noted above, the natural beauty of the landscape is in transition away from the Greensand Hills. The Boundary Report made it clear that where 'the land flattens out, becoming less topographically interesting, and lacks wider views, or has undergone change as a result of management which affects landscape condition due to intensive farming, equestrian uses or golf course development, it has been excluded. The east west historic lanes and tracks which traverse this landscape have frequently been used as suitable boundary features within this transitional landscape.'  This has influenced the decision to bring the boundary line north to follow the east west bridleway/track imm

Boundary	Boundary		
<u>Theme</u>	Representations	Natural England Commentary	
		<ul> <li>Residential development associated with Woodstock House.</li> <li>Equestrian land uses at Jordans Farm and also south of Volvens Farm.</li> <li>Southerly aspect of topography with views to the Greensand Hills becoming less frequent or arresting.</li> <li>Flatter land and larger regular enclosures south of Volvens Farm where there is evidence of field boundary loss.</li> <li>Less varied scenic compositions in the east of the area due to regular fields with straight boundaries, evidence of boundary loss and relative lack of woodland or topographic variation.</li> <li>Nevertheless, it is acknowledged that, in the west, the area contains some patches of ancient woodland and that the area, as a whole, contains ten Grade II listed buildings associated with farmhouses and barns dating to the 16<sup>th</sup>, 17<sup>th</sup> and 18<sup>th</sup> centuries. These buildings add local interest, but given the number, they collectively make a more significant contribution overall. There are also occasional undulations in topography and intermittent views northwards to the greensand ridge which lift scenic quality.</li> <li>Determining the boundary in this transitional landscape is finely balanced and Natural England acknowledges that an alternative boundary could be drawn southwards along Pisley Lane and still be within the transitional landscape albeit comprising a less conservative line. Whilst a boundary drawn along Pisley Lane would result in the inclusion of some lesser quality landscape, both in the east and at Jordans Farm, on balance Natural England has considered that the landscape is still of high quality and that overall there is merit in the option to bring the boundary to Pisley Lane.</li> <li>Conclusion</li> <li>Minor addition to include land north of Pisley Lane.</li> <li>(Addition 19 – Refer to Figure 26b)</li> </ul>	

Boundary		
<u>Theme</u>	Representations	Natural England Commentary
Support for the proposed Addition 19: Land north of Pisley Lane	52 respondents agreed with the designation of Addition 19 and some provided a reason for their view.  Statutory Consultee support included:	Commentary  Natural England acknowledges the support of the Local Authorities for this addition and the reasons given.
. ioio, Laiio	ANON-PQ5Q-KRRC-S (Mole Valley District Council)	2 respondents disagreed with the designation of Addition 19 but provided no reason for their view.
	'Yes, the Council agrees that this should be designated as part of the Surrey Hills National Landscape [AONB].	Conclusion No change.
	In responding to the initial consultation which closed in June 2023, the Council submitted two alternatives for how the Surrey Hills boundary might have more appropriately been amended within this area. While it is unfortunate that the larger amendment has not be [been] accepted, it recognises that issues of tranquillity from air noise and the sheer scale of the suggested amendment would have been difficult to include wholly whilst ensuring the established methodology was robustly followed and criteria met.	
	It is however, pleased [pleasing] to see the inclusion of the smaller, albeit still significant area of land which it considers both reflects the high-quality landscape in the area, but also strengthens the southern boundary of the SHNL [AONB]. The Council welcomes the addition of the Land north of Pisley Lane as shown on Map 26b, reference A19.'	

Boundary		
<u>Theme</u>	<u>Representations</u>	Natural England Commentary
	ANON-PQ5Q-KR3Y-G (Waverley Borough Council)	
	'Waverley Borough Council broadly supports the specific areas within Waverley that are proposed to be in addition to those areas that were proposed for inclusion in the AONB in the first consultation that ran from March to June 2023.	
	Waverley also agrees that the proposed boundaries for extending the AONB are logical and adhere to the principles for setting an AONB boundary. However, this view is based on a high-level assessment of the proposals and therefore it is appreciated that our local communities will have more detailed knowledge of their areas. As such, where our local communities have some concerns about the details of the boundaries on the ground or that in some cases, feel that additional land should be proposed for inclusion in the AONB, we would urge Natural England to carefully consider their representations.'	
Support Addition 19 but wish to see more land included and	2 respondents wished to comment on the boundary, however, one did not provide a comment, while the other commented as follows:	Commentary  Natural England note that Mole Valley District Council supports the current addition as proposed.
an alternative	ANON-PQ5Q-KRTU-D	
boundary	'Notwithstanding its initial arguments against extending the AONB boundary to include land north of Pisley Lane, the agency in the end conceded that 'on balance Natural England has	Natural England has interpreted Respondent <b>ANON-PQ5Q-KRTU-D</b> reference to 'initial arguments' as referring to the Natural Beauty Assessment.

Boundary	Boundary		
<u>Theme</u>	Representations	Natural England Commentary	
	considered that the landscape is still of high quality and that overall there is merit in the option to bring	Appendix 4 of the Natural England Guidance is clear that land should not be included merely to protect it from specific development proposals.	
	boundary extension as proposed would include land that contains 'patches of ancient woodland and a number of listed buildings', Mole Valley District Council has argued that the land to the south of Pisley Lane has high scenic quality, and	Natural England define AONB boundaries based in the extent of land that meets the Natural Beauty Criterion and on specific boundary considerations. The boundary is not defined on the basis of its shape.	
		Pages 22 - 24 above set out the reasons why the boundary was extended as far as Pisley Lane. Given the transitional nature of the landscape in this area, Natural England considers the proposed boundary along the clear feature of Pisley Lane is the most appropriate boundary in this instance.	
	Gatton Manor Hotel (given the lack of respect in practice for AONBs' settings).	Conclusion No change.	
	Proposed boundary		
	In order to eliminate the salient that the proposed boundary would create, as well as to ensure that an east-west alignment is followed that more closely conforms to the contour line, it is therefore suggested that a revised boundary should instead extend west of Cathill Lane along New Barn Lane and then along the footpath through Holden Wood to the point where it meets Green Lane (east of Mayes Green).'		
Include Okewood Hill and Wallis	ANON-VUXE-WEZ7-N (Mole Valley District Council) and ANON-VUXE-WEAP-N Reasons given include:	Commentary  This area was considered as part of EA12 in the Natural Beauty Assessment. As	
Wood	Natural Beauty:  Sits below Leith Hill.	mentioned above this land was found to be transitional in terms of its scenic qualities as it moves further away from the Greensand Hills.	

Boundary		
Theme	Representations	Natural England Commentary
	<ul> <li>Importance of far reaching views and scenic quality.</li> <li>Vantage points with uninterrupted views across the Surrey Hills.</li> <li>Extensive area of predominately ancient woodland in weald landscape.</li> <li>Secluded deep woodland ghylls.</li> <li>Remote and tranquil despite extensive settlement patterns.</li> <li>Parkland.</li> <li>Pockets of low-density and sporadic development throughout the area but the undulating land masks much of this.</li> <li>Development at Walliswood and Okewood Hill is low density like other settlements such as Betchworth and Buckland which are proposed for designation.</li> <li>Nearby High Weald AONB, the ebb and flow of the land obstructs far reaching views but is considered a characteristic of the AONB's beauty. As such, there is a precedent within the AONB designation process to recognise this and it is considered to be relevant here.</li> <li>13th Century church at Okewood Hill</li> <li>Limited human impacts but aircraft noise is disruptive but physical characteristics of the land on the ground and the high-quality views and scenic nature should not be undermined by this – aircraft noise should</li> </ul>	This area of land lies to the south of Pisley Lane and is c. 3.5km from Leith Hill at is closet and c.6km at its furthest extent. Whilst there is some topographic variation it is mainly associated within wooded incised ghylls which dissect the area. Although there are some high points for example southwest of Gatton Manor Hotel and golf club and Ockwood Hill, the heavily wooded nature of the area means that longer distance views are limited.  Natural England acknowledges that this area includes notable areas of ancient woodland and that this is the case for much of the Low Weald as well as features of cultural heritage interest including the sculpture park and Okewood Church (as noted in the Natural Beauty Assessment Report). However, Natural England also notes that this area is significantly affected by the flight paths of aircraft from Gatwick Airport - the frequency and noise level substantially impacting perceptions of tranquillity and the natural beauty of the landscape. A review of official flight paths and noise mapping confirmed this.  Issue relating to desirability relating to the AGLV, permitted development rights and land management are considered in detail in Appendix 2.  Natural England Guidance is clear that, for land to be considered in relation to desirability, it must first meet the Natural Beauty Criterion. As noted above, Natural England is of the view that this area has declining natural beauty and does not have the qualities which are evident further to the north, given the distance from the greensand hills, limited views, land use patterns and aircraft noise.  Natural England remains of the view that this land should not be included within the proposed boundary extension. Furthermore, Natural England Guidance.  Conclusion  No change.

Boundary	Boundary		
Theme	Representations	Natural England Commentary	
	be attributed less weight and does not affect qualities of the land.		
	Desirability:		
	<ul> <li>Land is an Area of Great Landscape Value (AGLV), and designating as AONB would provide the future security and permanence that a statutory national designation provides.</li> <li>Bringing this area into the AONB would bring with it benefits from additional protection from Permitted Development Rights, ensuring any future development can be managed to ensure it does not conflict with the purposes of the AONB designation.</li> <li>Management schemes and regulation of the wider land should be consistent, given the similar characteristics of this area and adjacent proposed extension.</li> <li>Exclusion may well result in detrimental outcomes to land management, biodiversity and the wider area. It would be logical to include the parcel at the very least to avoid any such risks.</li> <li>Given the size of this area, coupled with the already Natural England proposed swathe of land to the north, opportunities for AONB-related business and tourism could be extensive. Adding to the Surrey Hills Enterprises could support more local</li> </ul>		

Boundary	Boundary		
Theme	Representations	Natural England Commentary	
	businesses and promote sustainable business and land management.  Boundary: Follow Horsham Road and minor lanes south of Walliswood and then onto Oakwood Hill. Stane Street would form the eastern proposed boundary up to the proposed Extension Area.		
Inclusion of Ewhurst and immediate setting	ANON-VUXE-WEAP-N, ANON-VUXE-WMKY-G, ANON-VUXE-WMDQ-1  Reasons given include:  Natural Beauty:  Includes areas of natural and built beauty including the village. Folding hills and farmland. Bluebell woodlands. Areas east and west of B2127 should be joined up to establish a contiguous zone. Not isolated from rural environment.  Desirability: Harmful to isolate the village from the immediate rural environment. Protection from further development.  Boundary: To be drawn to the south of Ewhurst Green.	Commentary  The Natural Beauty Assessment Report notes that at Ewhurst there are two conservation areas (page 178); one relating to the main historic street which nestles into the lower slopes of the Greensand Hills, and the second relating to an area of former common to the south (Ewhurst Green). It goes on to state 'Nevertheless, the settlement has experienced 20th century settlement growth such that its two historic focal points have become merged, and its form and character have become altered.'  It went on to state that 'Scrutiny will also be required when defining a boundary around Ockley settlement and Ewhurst. Whilst the historic parts of settlements are distinctive, more recent modern development is also evident. The boundary setting criteria in the Natural England Guidance on Assessing Landscapes for Designation would normally preclude both the inclusion of a settlement on the edge of an area of qualifying land, and the splitting of settlements within a Candidate Area.'  It concluded that 'the small settlements of Ewhurst and Ewhurst Green have not been included due to declining landscape quality and character to the south, and due to the extent of more recent development which has joined the two hamlets altering their character and form. Care will be needed at the boundary setting stage when defining a boundary close to the settlement edge.'  Natural England agrees that the fields to the east of the village form some attractive undulating pastures with woodland and hedgerows. This area is discussed in more detail below, in relation to land east of Ewhurst as far as Plough Lane.	

Boundary	Boundary		
<u>Theme</u>	<u>Representations</u>	Natural England Commentary	
		In terms of desirability, Natural England does not consider exclusion of the settlement would leave it isolated from its rural environment and notes that the boundary comes close to the edges of the settlement. Furthermore, Natural England does not designate land in order to protect it from development as set out in Appendix 4 of Natural England Guidance.  Natural England remains of the view that the settlement of Ewhurst and Ewhurst Green should remain excluded from the boundary extension.  Conclusion No change.	
Include land east of Ewhurst as far as Plough Lane	ANON-VUXE-WEV7-H, ANON-VUXE-W5R4-T, ANON-VUXE-W5RF-C Reasons given include:	Commentary  This area was included within the Candidate Area following the Natural Beauty Assessment. However, when defining a boundary it was considered that Plough Lane was a clear and robust feature to follow.  Natural England has reviewed this area in light of consultation responses and agrees that this area is a small scale meadow landscape which has an intimate quality and is drained by Cobbler's Brook and includes an SNCI (Westland Farm Wood). Natural England also notes that there is some equestrian land uses which are of lesser quality closer to the settlement.  Natural England agrees that an alternative boundary could be drawn along the brook to bring in these high-quality meadows, and that this would still exclude the equestrian uses closer to the settlement edge.  Conclusion  Minor addition to include land west of Plough Lane with boundary following Cobbler's Brook.	
		(Addition 20 – Refer to Figure 26b)	

Boundary	Boundary		
<u>Theme</u>	Representations	Natural England Commentary	
Support for proposed Addition 20: Land west of Plough Lane	56 respondents agreed with the designation of Addition 20, and only one provided a reason for their view as follows:  ANON-PQ5Q-KR3Y-G (Waverley Borough Council)  'Waverley Borough Council broadly supports the specific areas within Waverley that are proposed to be in addition to those areas that were proposed for inclusion in the AONB in the first consultation that ran from March to June 2023.  Waverley also agrees that the proposed boundaries for extending the AONB are logical and adhere to the principles for setting an AONB boundary. However, this view is based on a high-level assessment of the proposals and therefore it is appreciated that our local communities will have more detailed knowledge of their areas. As such, where our local communities have some concerns about the details of the boundaries on the ground or that in some cases, feel that additional land should be proposed for inclusion in the AONB, we would urge Natural England to carefully consider their representations.'	Commentary  Natural England acknowledges the support of Waverley Borough Council for this addition and the reasons given.  2 respondents disagreed with the designation of Addition 20, but provided no reason for their view.  No respondent wished to comment on the boundary. Natural England notes therefore, that there are no responses specifying a change to the boundary in this area.  Conclusion  No change.	

Boundary		
<u>Theme</u>	Representations	Natural England Commentary
Theme  Land east of Cranleigh	ANON-VUXE-WEAP-N, ANON-VUXE-WSQC-6, ANON-VUXE-W5RF-C, ANON-VUXE-W5E6-F  Natural Beauty:	Commentary  The 2010 study of this landscape was undertaken by Chris Burnett Associates and considered landscape which expressed similar characteristics to the existing AONB. The Natural Beauty Assessment Report noted that this assessment was not compatible with Natural England Guidance for assessing landscape for AONB designation (para 3.4.5 second bullet).  The Natural Beauty Assessment Report noted in relation to landscape quality that 'Towards Ewhurst and Cranleigh the patterns have become disrupted by extensive boundary loss, stud and horse paddocks and 19th century plantations' and that 'There are also woodland areas within Higher Tier Stewardship to the east of Cranleigh, however these woodlands show signs of lack of management and neglect with fallen trees, former coppice now overgrown, and the presence of invasive species.'  In terms of scenic quality, it noted that 'To the east and south of Cranleigh and south of Mayes Green, woodland constitutes the dominant land cover, reducing longer distance views and creating a more enclosed inward-looking landscape which has less scenic quality.'  It also noted, under relative wildness and relative tranquillity, that where there are extensive areas of woodland and areas only accessible on foot, there is a greater sense of remoteness, although in this area it is reduced by noise intrusion from traffic on the Horsham Road to the south of Bookhurst Road to the north. The woodlands east of Cranleigh are noted as ancient but also contain more recent plantation e.g. Firtree Wood.  The extensive woodland cover means that views are often restricted with only
	management plan projects and enables access and connections into the AONB from Cranleigh.	occasional long-distance views to the Greensand Hills to the north. In places there is evidence of equestrian land uses which has resulted in some field sub-division and distribution of landscape patterns.
	Boundary:	Overall, this landscape is considered to be attractive countryside and typical of the Low Weald. It is also separated from qualifying land to the north by woodland which is

Boundary	Boundary		
<u>Theme</u>	Representations	Natural England Commentary	
	Follow woodland, watercourses and footpaths extending as far south as Bowles Farm.	not regarded as meeting the Natural Beauty Criterion due to lack of management and invasive species and lack of distinctiveness.	
		Desirability: Land must first meet the Natural Beauty Criterion before desirability issues can be considered. Furthermore, AONBs actively work with partners beyond their boundaries including improving access into the AONB from centres of population such as Cranleigh. This issue is considered in more detail in Appendix 2.	
		Boundary definition with a transitional landscape: Natural England does not consider that the proposed boundary has been drawn too conservatively, given the range of issues that exist and the transitional nature of the landscape as it moves away from the Greensand Hills.	
		Conclusion No change.	
Requests for Exc	clusion of Areas		
Exclusion of	BHLF-VUXE-WSKY-P	Commentary	
Ockley Village and Ockley Court and land which does not meet the Natural Beauty Criterion	The proposed boundary was drawn beyond the Candidate Area and therefore must include land that does not meet the Natural Beauty Criterion and is therefore not in accordance with Natural England Guidance.	Assessment of Natural Beauty and Definition of the Candidate Area The HDA study has not been relied upon during the boundary review process and the landscape has been tested afresh against the Natural England Guidance and natural beauty factors. There are a number of situations where land is recommended for designation which was previously not identified in the HDA study.	
Citterion	Reasons include:  • Land was not identified as suitable for designation in the HDA study.	The distribution of evidence put forward during the 'Call for Evidence' is mapped and available on the project website. Relevant evidence has been incorporated into the Natural Beauty Assessment Report tables.	
	The EA was extended further east following the 'Call for Evidence' but this evidence is not available for review.	Natural England Guidance states at Paragraph 5.3 (last bullet) that 'It is not necessary to identify a precise 'hard' boundary for a Candidate Area within which the technical criteria are considered likely to have been met at the evaluation stage. However,	

Boundary		
<u>Theme</u>	Representations	Natural England Commentary
	<ul> <li>Candidate Area excludes southern part of Ockley.</li> <li>A29 causes fragmentation.</li> <li>Ockley should be excluded because:</li> <li>Southern part fails to contribute positively to the natural beauty of the area.</li> </ul>	gradual or sudden changes in quality or character near the margin of an Evaluation Area should be recorded, as they may be important for subsequent detailed boundary setting.' It goes on to state at paragraph 5.8 that 'The result of the evaluation stage of the assessment is that all or part of each Evaluation Area that appears likely to be able to meet the technical criteria (either by itself or with other areas as part of a larger designated area) is identified as a <b>Candidate Area</b> for potential National Park and/or AONB designation. In cases where the judgment is not clear cut one way or the other, the area may be identified for further and more detailed scrutiny during boundary
	<ul> <li>Has hard edges and domestic garden boundaries and has a built form of limited architectural merit.</li> <li>Limited quality of the townscape and influence on the adjoining land.</li> <li>Ockley Court should be excluded because:         <ul> <li>Land not part of AGLV nor Candidate Area.</li> <li>Not part of Ockley Conservation Area.</li> <li>Ockley Court lies at the edge of a transitional landscape.</li> </ul> </li> </ul>	The Natural Beauty Assessment Report (page 179) for the Ockley area makes it clear that the issues are finely balanced due to the transitional nature of the landscape and scrutiny in relation to Ockley settlement. It goes on to state 'The extent of the Candidate Area has been drawn to exclude those areas where the change is sufficiently evident for the landscape to not meet the natural beauty criterion. However, changes in landscape qualities and scenic qualities are not abrupt. Therefore, the definition of the Candidate Area shows broad areas which may qualify for designation, and a detailed boundary line may be drawn within, or relatively close to this area, recognising that the definition of a boundary in this landscape is likely to be challenging.'
	<ul> <li>Not desirable to include these areas:</li> <li>Long term regulatory implications on business and people who live and work in the area.</li> <li>No consultation with Natural England despite being large landowner.</li> <li>Problem with Local Plan and meeting local housing need.</li> <li>Need for a public inquiry.</li> </ul>	It is therefore clear that the extent of the Candidate Area was intended to be a guide and that further detailed assessment was required at the boundary assessment stage. Whilst a detailed boundary is often drawn within a Candidate Area, in some situations there is a justification, following more detailed assessment and the consideration of boundary options, to identify a boundary beyond. There is nothing in the Natural England Guidance which precludes this approach.  The extent to which the A29 causes fragmentation was noted on page 174 of the Natural Beauty Assessment Report in the context of the cumulative effect of transport infrastructure including the combination of the A29 with the Horsham to Dorking railway
	Boundary: No alternative boundary was proposed.	line and the A24. These cumulative effects are most felt in the far east of the area.  Inclusion of Ockley

Boundar	Boundary		
Theme	Representations	Natural England Commentary	
		The Natural Beauty Assessment Report highlighted the need for particular scrutiny of Ockley settlement, given the high quality of the majority of the settlement and the declining quality to the south and its position in relation to the margins of qualifying land.	
		Despite the lesser quality areas of development to the south, there is still a significant number of listed buildings within the village and all development along the road falls within the Conservation Area.	
		Although there is no Conservation Area Appraisal for Ockley, the Mole Valley Local Plan 2000 included a description of the Ockley Conservation Area at Appendix 6. This highlighted the following:	
		'Ockley Conservation Area is a linear collection of buildings lying along the A29 in a splendid landscape setting. To the north west the wooded slopes of Leith Hill overlook the village. To the east there are views out to the rolling farming landscape of the Weald. The northern and central section of the Conservation Area is arranged informally around an extensive elongated Green. The picturesque cottages, the informality of the Green and the surrounding hills combine to produce a scene of great beauty. South of the Green the character changes. There is a closer-knit feel and a more mixed architectural character. Gaps in the frontage and views out into the countryside are reminders of the rural setting The charm of Ockley owes much to the open character of the Green. Its informality is enhanced by meadow maintenance, its irregular western boundary, and the gaps between the houses which link the fields beyond to the open space in the centre of the village. There are important open spaces between buildings on the east side of the A29. The gaps around the village hall and south of Swiss Cottage, for example, provide valuable visual links to the countryside around.'	
		Whilst this description acknowledges the in-depth more recent development which has occurred in the south, notably Elmers Road, Cricketers Close and Brickyard Copse, the connection of the village to the wider landscape remains apparent, especially to the east and northwest.	

Boundary		
Theme	Representations	Natural England Commentary
		A planning inquiry in relation to 7 residential properties off Stane Street, Ockley provides further understanding of the qualities of the village and the role of the surrounding landscapes (Appeal Ref APP/C3620/W/16/3155493). The Inspector's Report highlighted the characteristics of the village which are of significance, including:  • Essentially linear form along Stane Street,  • Importance of extensive elongated Green to the north of School Lane  • Gaps in the built form which provide linkages between the settlement and the surrounding countryside.
		At para 18 of the Inspector's Report, the Inspector noted the more recent residential developments but concluded they have led to localised change and have not materially altered the characteristics which give the area its significance. At para 25, the Inspector states 'However, even if I were to accept that those developments [Kings Arms and Wheelwright Court] have not been harmful to the Conservation Area, considered cumulatively, they have not materially altered its character as a whole' Natural England agrees with this conclusion.
		On balance, therefore, Natural England remains of the view that the whole of Ockley village should be included within the proposed AONB extension and the village as a whole makes a positive contribution to the surrounding landscape and the surrounding landscape penetrates the settlement even in the south.
		Natural England does not agree that the more recent areas of development in the south of the village constitute the 'main part' of Ockley, as set out in para 2.34 of <b>BHLF-VUXE-WSKY-P</b> evidence, but rather constitutes a minor part of the exceptional village as concluded by the Inspector. Natural England also does not agree that the more recent 20 <sup>th</sup> century development in the southern part of Ockley represents incongruous development which decreases the natural beauty of the wider landscape. The harder edge to development on the western side is not widely visible from the surrounding landscape due to extensive woodland.
		Natural England does not consider the allocated sites within Ockley are of a sufficient scale to tip the balance of judgment in favour of exclusion of the settlement as a whole.

Boundary		
Theme	Representations	Natural England Commentary
		Inclusion of Ockley Court  Natural England agrees that the land surrounding Ockley Court does not form part of the AGLV. Nevertheless, the Natural Beauty Assessment Report has found that Ockley Court, which comprises a collection of listed vernacular buildings that contribute to the natural beauty of the area, does quality for designation. This is reflected in the Candidate Area which included the hamlet. As noted above, the extent of the Candidate Area was noted as not absolute and that defining a boundary in this transitional landscape would be challenging.
		Natural England agrees that Ockley Court does not form part of the Ockley Conservation Area but this does not mean it is not of merit, nor that it does not express natural beauty given its architectural and historical interest and location within a tract of qualifying land. Natural England acknowledges that the landscape is transitional and that there are pockets of lesser quality land due to land use, field boundary loss or development. However, Natural England considers that the landscape to the south of Ockley Court also expresses natural beauty with scenic compositions as a result of views to the Greensand Hills, topographic variation and features of interest including the Ockley smock mill (Elmers Mill), Vann Lake SSSI, areas of ancient woodland and incised ghylls. Overall, Natural England is of the view that land included within the proposed boundary expresses sufficient natural beauty to justify inclusion within the proposed AONB extension.
		<b>Desirability:</b> The various issues relating to desirability including long term regulatory implications, meeting housing need and the request for a public inquiry are set out in Appendix 2
		Conclusion No change.

Boundary		
Theme	Representations	Natural England Commentary
Exclusion of land west of Ewhurst	<ul> <li>BHLF-VUXE-WS17-T</li> <li>Reasons given include:</li> <li>Natural Beauty: <ul> <li>Not characteristics of wider qualities of the AONB.</li> <li>Immediately adjoins and forms part of curtilage to adjacent homes at Thornhurst Brook Farm.</li> <li>Includes associated access, buildings and structures – domestic in nature and a residential cluster.</li> <li>Closer affinity with edge of Ewhurst</li> <li>Attractive countryside not outstanding.</li> </ul> </li> <li>Boundary: <ul> <li>Proposed boundary is weak.</li> <li>Follows degraded hedgerow across open field.</li> <li>Boundary should follow woodland west of Thronhurst Brook.</li> <li>More consistent boundary.</li> </ul> </li> </ul>	Natural England has reviewed this area. The proposed boundary describes that it follows hedgerows and the northern side of Thornhurst Lane (page 50 of the Boundary Considerations Report) and also excludes buildings at Sayers Croft Outdoor Learning Centre. The intent of the proposed boundary is to exclude the access road and buildings and structures associated with Thornhurst Brook Farm. Natural England note that some change has occurred since the original boundary assessment and has identified an alternative boundary slightly to the north which excludes parts of the curtilage associated with homes at Thornhurst Brook Farm and avoids confusion.  Conclusion  Minor deletion to exclude land associated with curtilage associated with Thornhurst Brook Farm.  (Deletion 11 – Refer to Figure 26b)
Support for the proposed Deletion 11	Of the 32 responses received for this area, 23 were in support, with only one providing a reason for their view as follows:	Commentary  Natural England acknowledges the support for this deletion but notes that some respondents object to Deletion 11 and this is considered below.
	ANON-PQ5Q-KR3Y-G (Waverley Borough Council)	

Boundary			
Theme	Representations	Natural England Commentary	
	'Waverley also broadly supports the deletion of those specific areas that were originally proposed for inclusion in the AONB in that first consultation. The Council agrees with the accompanying assessment		
	Waverley also agrees that the proposed boundaries for extending the AONB are logical and adhere to the principles for setting an AONB boundary. However, this view is based on a high-level assessment of the proposals and therefore it is appreciated that our local communities will have more detailed knowledge of their areas. As such, where our local communities have some concerns about the details of the boundaries on the ground or that in some cases, feel that additional land should be proposed for inclusion in the AONB, we would urge Natural England to carefully consider their representations.'		
Object to proposed Deletion 11 and	Of the 32 responses received for this area, 1 respondent provided a reason for their view, objecting to the deletion.	Commentary  Decree 20, 22 shows considered the submissions by respondents and set suit the	
wish to comment on	ANON-PQ5Q-KRTN-6	Pages 20 - 22 above considered the submissions by respondents and set out the reasons why Natural England does not agree that the boundary should be extended	
the boundary to include more land	[Anon] OBJECTS to the deletion of area D11 in the Ockley Low Weald Extension.	further south to include woodland in this area.  Natural England has reviewed this evidence and maintains that the previous rationals for the proposed boundary is sound.	
	[Anon] wishes to reiterate its response to the 2023 consultation (copy attached) that [Anon] considers that the proposed Ockley Low Weald boundary has		
	been drawn too conservatively in this area of	Conclusion	

Boundary		
<u>Theme</u>	Representations	Natural England Commentary
	transition and that an area immediately to the south of the proposed Ockley Low Weald Extension merits further consideration for designation as part of this extension to the Surrey Hills AONB.'	No change.