

## Appendix 19: Dunsfold Low Weald

Please refer to Figure 27b

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

### Overview

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

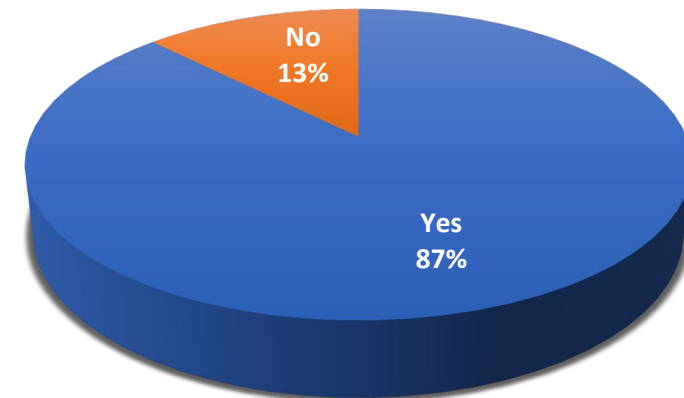
Natural Beauty	Responses
Yes	21
No	3
Not sure	0

Of the 24 respondents who answered Question C1, 21 respondents (87%) felt that the Dunsfold Low Weald extension area has sufficient natural beauty to be designated as AONB.

In contrast, 3 respondents (13%) felt that the Dunsfold Low Weald extension area does not have sufficient natural beauty to be designated as AONB.

Desirability reasons for including and excluding land within the proposed extension tended to focus on development control – some respondents felt that the Areas of Great Landscape Value (AGLV) designation has been insufficient at conserving the special qualities of the area while others felt that the AGLV, Green Belt and Dunsfold Conservation Area provided sufficient protection and that there was no need for AONB designation. These are addressed in Appendix 2.

Dunsfold Low Weald - Sufficient natural beauty to be designated



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

Boundary	Responses
Yes	8
Yes, but I wish to suggest an alternative	10
No	5
Not sure	1

Of the 24 respondents who answered Question C5, 8 respondents (33%) agreed with the proposed boundary for the Dunsfold Low Weald extension area while 5 respondents (21%) did not.

10 respondents (42%) agreed but wished to suggest an alternative boundary for the extension area, many providing supporting evidence.

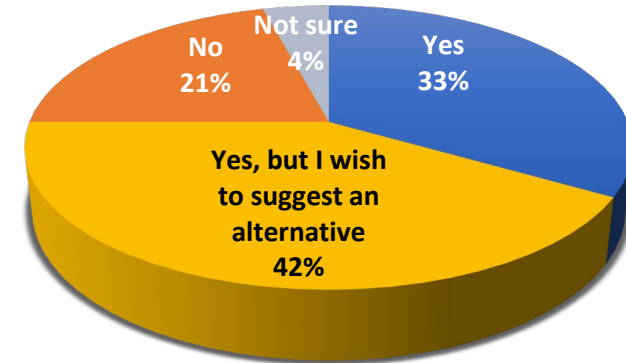
The additional areas of land that respondents wish to see included within the proposed extension are:

- The whole of High Loxley Road
- AGLV land to the northeast
- Land north of Chiddingfold Road and along Plaistow Road
- Land in the southwest to the west of Plaistow Road and including Oaken Wood
- Wider area extending as far as the County Boundary and connection to the South Downs National Park.

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

- The village of Dunsfold and land to the east.

Dunsfold Low Weald - Agreement with the proposed boundary



During the second (2024) statutory consultation, responses were received regarding **Addition 21: Land at Sayers Land, Addition 22: Land at Loxley Bridge and Deletion 12: Land north of Chiddingfold Road**. Natural England has reviewed these responses and provided further commentary in blue below.

Additional responses were also received relating to **land south and southeast of the proposed boundary**. Natural England has reviewed these areas and provided further commentary in blue below.

Natural Beauty		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
<b>The proposed extension meets the Natural Beauty Criterion</b>	<p><b>ANON-VUXE-WS1W-T (Waverley Borough Council)</b>  <i>'Waverley 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.'</i></p> <p><b>ANON-VUXE-WEGW-2</b>  <i>'...[Anon] generally agrees with the conclusions of the Natural Beauty Assessment Final Report (February 2023) (the "NB Report") in respect of Evaluation Area 13.'</i></p> <p><b>ANON-VUXE-WESM-4</b>  <i>'I agree with the conclusions of the natural beauty report re. evaluation area 13. The area is rich in cultural and natural heritage and enjoys varied topography.'</i></p> <p><b>ANON-VUXE-WENP-2</b>  <i>'Clear evidence put forward.'</i></p> <p><b>ANON-VUXE-WEV7-H</b>  <i>'We support your reasons for justification.'</i></p> <p><b>ANON-VUXE-WEKV-5</b>  <i>'I am not a landscape professional but it is apparent on the ground that the characteristics of this landscape form blend with the existing AONB.'</i></p> <p><b>ANON-VUXE-WEX7-K</b></p>	<p><b><u>Commentary</u></b></p> <p>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.</p> <p>Natural England has also taken account of detailed responses requesting changes to the boundary and proposes some amendments. These are set out below.</p>

Natural Beauty		
Theme	Representations	Natural England Commentary
	<p><i>'It fulfils all the required criteria - ancient buildings, old trees, meadowlands/remnants of old orchards and common land and is intrinsically beautiful.'</i></p> <p><b>ANON-VUXE-WMKH-Y</b>  <i>'The reasons for inclusion have been clearly detailed in the proposal document. It's a stunning area at risk of being lost.'</i></p> <p><b>ANON-VUXE-WMJT-A</b>  <i>'A beautiful village [Dunsfold] with lots of common land/greens and ponds throughout. Hugely important to protect for wildlife and the appearance of the village as it stands.'</i></p> <p><b>ANON-VUXE-WMKK-2</b>  <i>'Dunsfold is a charming English village with perfect areas of green space. Rolling pastoral land and a tranquil setting. Yes, this area is peaceful with country views and rolling hills. There is much local wildlife and a tranquil setting.'</i></p> <p><b>ANON-VUXE-WMKX-F</b>  <i>'The Dunsfold Low Weald is a settled and established site of undulating pastoral landscape, surrounded by ancient woodland and with a quiet rural character and dark night skies. This is one of the most beautiful rural areas in the country and should undoubtedly be designated an AONB, in the same way as its immediate surroundings.'</i></p>	

Natural Beauty		
Theme	Representations	Natural England Commentary
	<p><b>ANON-VUXE-WM1T-H</b>  <i>'The area contains a number of natural beauty factors. The landscape quality is high with a mixture of pastures, woodland, some ancient and historic settlements.</i></p> <p><i>The scenic quality is similarly high with the setting low hills and valley and especially in the northwest the Greensand ridge provides an impressive backdrop to the setting.</i></p> <p><i>It provides a relative wilderness for this part of England with ancient woodland providing a suitable environment for plants and wildlife including some relatively rare insects. It also offers relative tranquillity being crossed on by minor roads and lanes mostly edged by attractive hedgerows. It offers natural heritage features in the form of ancient woodland as well as attractive cultural heritage with many buildings of historic interest.'</i></p>	
<b>The proposed extension does not meet the Natural Beauty Criterion</b>	<p><b>ANON-VUXE-W5T8-Z</b> considered the area to not meet the Natural Beauty Criterion, although no justification was given.</p> <p><b>ANON-VUXE-WEW3-E</b> considered that land at Coombebury Cottage, Dunsfold does not share all the same characteristics as the AONB and that more broadly the Extension Area was not considered of 'outstanding beauty' when the first area designation was made in the 1050's.</p> <p><b>ANON-VUXE-WEXK-7</b> considered the land east of the village of Dunsfold does not meet the Natural Beauty Criterion for the following reasons:</p>	<p><b>Commentary</b></p> <p>Natural England disagrees that the land identified for designation does not meet the Natural Beauty Criterion for the reasons set out in the Natural Beauty Assessment.</p> <p>Natural England has assessed the landscape in considerable detail against the factors set out in the Natural England Guidance on Assessing Landscapes for Designation.</p> <p>These specific issues raised by respondents are considered in more detail below in relation to the <b>exclusion of the village of Dunsfold and land to the east.</b></p>

Natural Beauty		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<ul style="list-style-type: none"> <li>• Land for inclusion is actively managed, pleasant countryside but not of quality or condition to warrant statutory landscape designation.</li> <li>• Land east of the village does not exhibit the same characteristics as land to the west of the village which has a stronger relationship to AONB.</li> <li>• Village has dichotomy in terms of urban grain – west comprises loose vernacular housing and east more recent development which is in keeping with the character of the village.</li> <li>• Proposed extension area does not coincide with AGLV, Hankinson Duckett area (2013) and Evaluation Area.</li> <li>• No explanation for why proposed extension extends further east than the Draft Area of Search and includes land noted in Chirs Burnett Associates study as only containing some characteristics which are the same as the existing AONB – evaluation relies on character.</li> <li>• More recent development to east of the village causes increased light spill and affects local character.</li> <li>• Land east and northeast of Dunsfold is not specifically mentioned in the Natural Beauty Assessment.</li> <li>• Inconsistency between past studies of the area, limited evidence base and does not present a convincing argument.</li> </ul>	

Boundary		
Theme	Representations	Natural England Commentary
General agreement with proposed boundary	<p>A significant number of respondents agreed with the proposed boundary simply answering yes on the survey form while some provided reasons for their view. Examples include:</p> <p><b>ANON-VUXE-WS1W-T (Waverley Borough Council)</b> <i>'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.'</i></p> <p><b>ANON-VUXE-WESM-4</b> <i>'I full[y] support the extension and am glad to see it cover the whole of Dunsfold settlement.'</i></p> <p><b>ANON-VUXE-WE2G-W</b> <i>'It is welcomed that no part of the proposed AONB expansion encroaches into land that was approved under the Dunsfold Park outline consent. It is pleasing to see that the Natural England consultation documents recognise the planning permission to come forward at Dunsfold Park. We have no</i></p>	<p><u>Commentary</u></p> <p>Natural England notes the support for the proposed boundary and has provided a detailed commentary to the boundary issues raised by other respondents, which can be found below.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>objection to the proposed boundary extension to Dunsfold Low Weald as currently proposed.'</i></p> <p><b>ANON-VUXE-W5BU-B</b></p> <p><i>'I support the proposal to extend the AONB to include Dunsfold Village, and I appreciate the challenges in identifying a suitable and appropriate new boundary, particularly to the south. To overcome these challenges it can be necessary to select a recognisable natural or artificial feature for the new boundary to follow. To the south of Dunsfold Village, the landscape starts to become fragmented and an area of transition. It is also quite far removed from the greensand hills to the north. But at the same time I can appreciate the need to identify a clear boundary for the proposed extension.'</i></p>	
Requests for Additional Areas		
<p><b>Extend boundary to include more AGLV to the northeast of current proposed boundary</b></p>	<p><b>ANON-VUXE-WEGW-2, ANON-VUXE-WEVF-Z, ANON-VUXE-WENP-2 and ANON-VUXE-WEKV-5</b></p> <p>Reasons included:</p> <ul style="list-style-type: none"> <li>Lack of clarity regarding qualifying land in the Natural Beauty Assessment which is included in the Candidate Area, yet also referred to as 'beyond the qualifying area' and also it is not clear when in the assessment the planning application for hydrocarbon exploration site influenced the decision to exclude the area.</li> </ul>	<p><b>Commentary</b></p> <p>The Natural Beauty Assessment specifically notes at page 185 that '<i>Many of the farmhouses are listed e.g. High Billingham Farm and Thatched House Farm forming a complex of historic buildings nestled in the landscape.</i>'</p> <p>The land to the northeast of High Loxley Road was substantially excluded in the Candidate Area, although it is noted that the Candidate Area has no outward boundary and illustrates the area most likely to qualify for designation. The Natural Beauty Assessment concluded at pages 186 and 187 that '<i>Particular scrutiny will also be required at the boundary setting stage in relation to recent planning permission for 1800 homes and possible further development of 800 homes as part of new Surrey Garden Village on Dunsfold Aerodrome. This site is allocated</i></p>



Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> <li>Open views south from Dunsfold Road and close proximity to Hascombe Hill.</li> <li>Size of field is not inconsistent with fields within the existing AONB and it contains mature trees and woodland.</li> <li>Conifer trees within The Burchetts have been felled.</li> <li>Strong visual association with AONB from bridleway to south.</li> <li>Historic listed farm at High Billingham Farm and Thatched House Farm.</li> <li>Undulating pastoral landscape.</li> <li>Sayers Land woodland is ancient woodland, including traditional coppicing and a ghyll stream.</li> <li>Planning permission for the hydrocarbon site is temporary (3 years) and could be included in accordance with Natural England Guidance.</li> <li>Extent of road widening at High Loxley Road is limited.</li> </ul> <p><b>Boundary:</b> The boundary is drawn too conservatively. An alternative boundary is proposed which uses the field boundaries in the vicinity of Thatched House Farm and then existing field boundaries to incorporate High Billingham Farm and Sayers Land.</p>	<p><i>for development in the Waverley Borough Local Plan (Policy SS7). Access will be off the A281 to the east.</i></p> <p><i>A further development in this area is the hydrocarbon testing site north of Dunsfold Aerodrome and east of High Loxley Road which was awarded planning permission. It will be a temporary facility for a three-year period, and whilst beyond the qualifying area of land in terms of natural beauty, access arrangements will require alteration to the northern part of High Loxley Road. The nature of these developments will therefore need to be taken into account when defining the boundary.'</i></p> <p>This makes it clear that, even though the Candidate Area did not extend into this area, the area was still under consideration and required particular scrutiny at the boundary setting stage.</p> <p>The Boundary Considerations Report revisited the issue of extant planning permissions in this area and adjacent. Page 54 the report states '<i>Consideration was also given to recent planning permission for an exploration into a hydrocarbon exploration site off High Loxley Road and also the proposed Garden Village development at Dunsford Aerodrome, both of which lie close to the qualifying area....</i></p> <p><i>The boundary has been drawn to the west of the Dunsfold Aerodrome which has been awarded planning permission for 1,100 homes, as part of a new Surrey Garden Village. Access to the new development will be from the east and will not affect the area qualifying for designation. Nevertheless, the proposed boundary has been drawn to the west, beyond the perimeter vegetation to the aerodrome, and also excludes land, which is of lesser quality, due to its flatter topography, equestrian land uses, farm development and limited views towards the greensand hills, e.g. land between New Pond Farm and Sayers Land.</i></p> <p><i>The boundary also lies adjacent to a hydrocarbon exploration site east of High Loxley Road. This development will require a widening of High Loxley Road at Pratts Corner, where it joins Dunsfold Road, and the creation of a new access into the site, which will necessitate the removal of 55m of the eastern hedgerow to the lane, and the</i></p>

Boundary		
Theme	Representations	Natural England Commentary
		<p><i>introduction of security fencing. The section of High Loxley Road between Dunsfold Road and the new site access will be used by HGVs for the duration of the site operations. Operations on site will be temporary for a period of three years and the site access restored to hedgerow along the lane on completion. Given the nature of this proposed development, the proposed boundary has been pulled to the west to follow the hedgerow along the western side of High Loxley Road. South of the site access, the proposed boundary crosses High Loxley Road to continue south along the eastern side of the lane, including it within the proposed extension. Although the proposed hydrocarbon exploration is temporary (three years duration), there appears to be no restoration of the narrowness of the lane where it joins Dunsfold Road at Pratts Corner. Furthermore, the restoration of the lane at the access will take time to establish. On balance therefore, the positioning of the boundary along the western side of the lane, excluding land which will be directly affected by the proposed works, is considered to be appropriate.'</i></p> <p>This area has been reviewed following responses during the Statutory Consultation. Natural England acknowledges that the land proposed for inclusion in the AONB boundary extension by respondents, focuses on the land associated with Thatched House Farm, The Burchetts, High Loxley Furze, High Billingham Farm and Sayer's Land. This area comprises undulating farmland which is located at the foot of the Greensand hills and affords scenic views towards the rising hills. The woodland blocks (albeit some 19<sup>th</sup> century plantations) and vernacular farm buildings, which nestle in the landscape, contribute to the scenic qualities. Nevertheless, the condition of this landscape has been affected by some equestrian land uses, although the effects are localised, and also by a new residential property (planning permission WA/2022/03255) which has been erected on a prominent site east of High Loxley Road, and larger scale, more open fields. Within Sayers Land, signage, fencing and river crossing infrastructure detract from the natural quality of the woodland.</p> <p>As noted in the Natural Beauty Assessment, this area of landscape is transitional. As a result, it includes features and qualities which contribute to natural beauty but it also has experienced some change and is likely to experience further change as a result of the hydrocarbon exploration site. However, Natural England notes that Sayers</p>

Boundary		
Theme	Representations	Natural England Commentary
		<p>Land woodland does contribute to the scenic qualities of qualifying land to the north and comprises areas of ancient woodland.</p> <p>On balance, Natural England considers that the woodland of Sayers Land should be included within the proposed extension along with the continuation of High Loxley Road. Natural England is of the view that defining the boundary any further to the east would place it at the lower quality end of the transitional landscape.</p> <p>The new proposed boundary follows High Loxley Road to the east of the woodland at Sayers land and bridleway 282 to the south of the woodland.</p> <p><b>Conclusion</b> Minor addition to include Sayers Land and High Loxley Road.</p> <p>(Addition 21 – Refer to Figure 27b)</p>
<p><b>Support for proposed Addition 21: Land at Sayers Lane</b></p>	<p><b>61 respondents agreed with the designation of Addition 21 and some provided a reason for their view. Where reasons relate to desirability, these are recorded in Appendix 2.</b></p> <p>Examples include:</p> <p><b>ANON-PQ5Q-KR3H-Y</b></p> <p><i>[Anon] is pleased to see Natural England include Sayers Land and High Loxley Road as a result of the first consultation. [Anon] agrees that Sayers Land and High Loxley Road contribute to the scenic qualities of qualifying land to the north and comprises areas of ancient woodland. [Anon] would also note that portions of Sayers Land are managed through traditional coppicing, and it also contains a small ghyll stream. [Anon] is aware of the recreational and amenity value of Sayers Land and High Loxley Road</i></p>	<p><b>Commentary</b></p> <p>Natural England acknowledges the reasons given by respondents in support for this addition.</p> <p>Whilst designation can bring additional protection from inappropriate development, Natural England does not propose land for designation in order to protect land from coalescence.</p> <p>2 respondents disagreed with the designation of Addition 21 but provided no reason for their view.</p> <p><b>Conclusion</b> No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>to local residents, as it forms a popular walking route taking in woodland, historic properties and views of the greensand Surrey Hills. Whilst [Anon] remains of the view that land further east is of sufficient quality and desirability to be included within a new boundary, it respects Natural England's professional assessment and has limited its comments in this consultation to the proposed additional land at A21. [Anon] strongly supports the inclusion of A21: Land at Sayers Land.</i></p> <p><b>ANON-PQ5Q-KRQ5-A</b></p> <p><i>'This area lies between Dunsfold Park and the village of Dunsfold and it is important that it is protected to avoid the coalescence of the two as Dunsfold Park is developed.'</i></p>	
<p><b>Support Addition 21 but wish to see more land included and an alternative boundary</b></p>	<p><b>3 respondents wished to comment on the boundary, however one provided a justification for including the Addition, one did not provide a comment and only one commented on the boundary as follows:</b></p> <p><b>ANON-PQ5Q-KRKW-6</b></p> <p><i>'The cut out in the natural boundary line at this location doesn't make sense. The land proposed to be excluded, in my opinion, qualifies. This cut into the boundary line is messy.'</i></p>	<p><b><u>Commentary</u></b></p> <p>It is assumed that respondent <b>ANON-PQ5Q-KRKW-6</b> is referring to land southwest of Addition 21. The reasons for excluding this land are set out in the Boundary Considerations Report (page 54) which states that <i>'the boundary was drawn in, west of the Aerodrome, excluding the large barns and development in the vicinity of New Pond Farm, as well as areas of equestrian use. These areas were considered to be of lesser quality as a result of fragmentation and management, but also due to less distinctive typography and fewer wider views.'</i></p> <p>Natural England acknowledges that the proposed boundary is more complex in this area but, nevertheless, follows clear features to exclude lower quality land.</p> <p><b><u>Conclusion</u></b></p>

Boundary		
Theme	Representations	Natural England Commentary
		No change.
Include the whole of High Loxley Road	<p><b>ANON-VUXE-WEVF-Z</b></p> <p>Reasons given include:</p> <ul style="list-style-type: none"> <li>• Treatment of Pratts Corner is short term and misconceived.</li> <li>• Weight given to the temporary consent for hydrocarbon exploration is inappropriate.</li> <li>• Carriageway widening of 60cm is minimal and will not change the character of the lane.</li> <li>• There will be restoration.</li> <li>• Trees on the eastern side of the lane have recently been protected with Tree Preservation Orders (TPOs) (group and individual).</li> </ul> <p><b>Boundary:</b> Follow the eastern side of High Loxley Road and to include the TPOs.</p>	<p><b>Commentary</b></p> <p>Natural England has reviewed this area in light of responses received during the Statutory Consultation.</p> <p>The Natural Beauty Assessment noted that the area east of High Loxley Road was declining in landscape and scenic quality and was at the margins of the Candidate Area. As noted above, the Natural Beauty Assessment made specific reference to the hydrocarbon testing site, noting that it lay beyond the qualifying area and that it was temporary but that the access arrangement would affect High Loxley Road. It was therefore highlighted as requiring particular scrutiny at the boundary setting stage.</p> <p>The Boundary Considerations Report considered the use of High Loxley Road as the proposed boundary. Reference was made to information regarding the proposed development which was in the public domain at that stage. It was noted that the scheme was allowed on appeal and therefore formed a planning permission close to/on a potential boundary.</p> <p>Natural England Boundary Considerations (Appendix 4 of the Natural England Guidance) state that “<i>land on the margins of a National Park/AONB identified in development plans (both adopted and emerging), or having the benefit of planning permission, for major built developments (including the extraction of minerals and other deposits) should normally be excluded from the National Park/AONB, unless the land will be developed or restored to a land use and quality which contributes to National park/AONB purposes. Land should not be included merely to seek to protect it from specific development proposals</i>”. Natural England Guidance also states at</p>

Boundary		
Theme	Representations	Natural England Commentary
		<p>para 6.10 that '<i>Natural beauty is assessed in terms of the current landscape, not some future potential for improvement. A rare exception may however apply where an existing initiative will deliver positive change of a standard which will meet the natural beauty criterion within the short term, and for which there is a high degree of certainty that it will be achieved.</i></p> <p>The Boundary Report concluded that drawing the boundary to the west to avoid including any part of the planning permission/access was appropriate. This decision was based on the fact that the qualities of High Loxley Road, which would otherwise have brought it into the AONB, would be adversely affected by the removal of hedgerow to create the site access, security fencing and HGV traffic. This decision is consistent with decisions made elsewhere on the boundary.</p> <p>Natural England disagrees that the decision to exclude the proposed development is facilitating development, as the development has already been awarded permission. Natural England acknowledges that the development will be temporary (3 years only) but also notes that the removal of the hedgerow along High Loxley Road will take more than three years to reestablish.</p> <p>The Boundary Report concluded that '<i>On balance therefore, the positioning of the boundary along the western side of the lane, excluding land which will be directly affected by the proposed works, is considered to be appropriate.</i>'</p> <p>If the status of the planning permission changes during the designation process, then the proposed boundary will be reviewed. This would have been the case had the Judicial Review been successful, however it was not, and the permission stands.</p> <p>Natural England note the new Tree Preservation Orders (TPOs) at the junction between High Loxley Road and Pratts Corner, and acknowledge that the proposed extent of road widening associated with the planning permission is not significant. Nevertheless, other considerations include the proposed removal of a section of hedgerow to the east of the lane, south of the TPO, and new access gates as well as HGV traffic. On balance, Natural England remains of the view that the boundary</p>

Boundary		
Theme	Representations	Natural England Commentary
		<p>should be drawn to the west of High Loxley Lane where it is affected by the development but then should cross the road south of the proposed access and continue along the eastern side of the lane.</p> <p><b>Conclusion</b> No change.</p>
<p><b>Include land along Chiddingfold Road and Plaistow Road</b></p>	<p><b>ANON-VUXE-WEGW-2 and ANON-VUXE-WEX7-K</b> Reasons included:</p> <ul style="list-style-type: none"> <li>Proposed boundary is particularly complicated.</li> <li>Excludes historic properties of Wintershall and Blacknest Cottage (Grade II) which are vernacular buildings along with other traditional farm cottages including those along Plaistow Road (Loxley Hill Cottage, Pincotes and Hillside Cottage) which demonstrate local vernacular styles.</li> <li>Excludes area of attractive meadow and orchard as well as veteran oaks.</li> <li>Excludes a small section of bridleway 286.</li> <li>Not clear if watercourse is included.</li> <li>No recent linear development in this area.</li> </ul> <p><b>Boundary:</b> Boundary is drawn too conservatively.</p> <p>Boundary should turn south at Blacknest Cottage and to follow Chiddingfold Road, bridleway and Plaistow Road before joining the current proposed boundary.</p>	<p><b>Commentary</b></p> <p>The Natural Beauty Assessment stated at page 187 that '<i>The ad hoc development along Plaistow Road and Chiddingfold Road, has also started to visually fragment the landscape. These influences will need to be reviewed when defining a boundary.</i>'</p> <p>The Boundary Considerations Report at page 54 stated that '<i>Linear development along Plaistow Road and Chiddingfold Road, south and west of Loxley Bridge, was noted as altering the road character in places with the introduction of close board fencing and development of commercial activity. The scale of some buildings was considered to be incongruous and has started to undermine the qualities of the lanes and adjoining landscape. Although these influences are relatively localised, they nonetheless have a cumulative effect. Careful consideration was given to the need to balance a clear boundary (such as the northern side of Chiddingfold Road, which would include some areas of development), with the need to exclude incongruous development on the edge, and thereby adopting a more complex boundary along the edge of woodland and a stream course. On balance, given the transitional nature of the landscape, and the need to exclude incongruous development on the edge, the more complex boundary to the north was considered preferable, ensuring that land to be included in the proposed extension, comprised high quality landscape with gently rolling rural qualities and a strong visual association to the wider greensand hills.</i>'</p> <p>Natural England has reviewed this area and notes that development along Chiddingfold Road does not form part of the settlement boundary of Dunsfold as illustrated in the emerging Neighbourhood Plan. Residential development in this area</p>

Boundary		
Theme	Representations	Natural England Commentary
	Boundary should include three historic houses south of Chiddingfold Road and west of Plaistow Road.	<p>comprises a loose arrangement of dwellings reflecting scatted settlement with paddocks post 1811 and pre 1940.</p> <p>Natural England agrees the boundary in this area is convoluted and difficult to follow on the ground (as highlighted in the Boundary Report). In reviewing the area more widely, Natural England is of the opinion that land north of Chiddingfold Road has suffered from field boundary loss and comprises much larger fields and new development which is visually prominent. This area lacks the more intimate qualities of the landscape associated with the small, incised ghylls to the north and east. On balance, therefore, the boundary has been redrawn in this area to exclude lesser quality land to the north of Chiddingfold Road, and to follow a clearer boundary on the ground. This has resulted in the exclusion of Standing Wood and the inclusion of a small area at Loxley Bridge.</p> <p><b>Boundary</b> The new proposed boundary includes bridleway 286 and follows its western edge.</p> <p><b>Conclusion</b> Minor addition to refine the boundary and minor deletion to exclude lesser quality land north of Chiddingfold Road.</p> <p>(Addition 22 – Refer to Figure 27b) (Deletion 12 – Refer to Figure 27b)</p>
Support for proposed Addition 22: Land at Loxley Bridge	<p>59 respondents agreed with the designation of Addition 22 and some provided a reason for their view as follows:</p> <p><b>ANON-PQ5Q-KR3H-Y</b></p> <p><i>[Anon] is pleased to see Natural England include land at Loxley Bridge, to include the remaining section of bridleway 286 and the Grade II listed property of Wintershall. [Anon] agrees that a clearer</i></p>	<p><b>Commentary</b></p> <p>Natural England acknowledges the reasons given by respondents in support for this addition.</p> <p>2 respondents disagreed with the designation of Addition 22 but provided no reason for their view.</p> <p>1 respondent wished to comment on the boundary but did not provide a comment.</p>



Boundary		
Theme	Representations	Natural England Commentary
	<p><i>boundary at this location is preferable. Whilst [Anon] would prefer to see a more extensively drawn boundary to include the additional areas it highlighted in its response to the first consultation, [Anon] respects Natural England's professional assessment. [Anon] strongly supports the inclusion of A22: Land at Loxley Bridge.'</i></p> <p><b>ANON-PQ5Q-KRKH-Q</b></p> <p><i>'Condistent [consistent] with existing proposals'</i></p> <p><b>ANON-PQ5Q-KRK2-1</b></p> <p><i>'I fully support the inclusion of the Wintershall Farm area west of Loxley Bridge. The combination of the listed vernacular buildings and land alongside the river is particularly attractive and forms a natural extension of the land along the river to the north down to Loxley Bridge.'</i></p>	<p>Natural England notes therefore, that there are no responses specifying a change to the boundary in this area.</p> <p><b>Conclusion</b> No change.</p>
Support for the proposed Deletion 12	<p><b>Of the 43 responses received for this area, 1 respondent provided a reason for their view, supporting the deletion.</b></p> <p><b>ANON-PQ5Q-KR3H-Y</b></p> <p><i>'.... [Anon] is naturally disappointed to see that Natural England is seeking to remove D12: Land north of Chiddingfold Road from the boundary. [Anon] considers that Natural England's observations</i></p>	<p><b>Commentary</b></p> <p>Natural England acknowledges the support for this deletion but also notes that some respondents object to Deletion 12 and this considered below.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>about the new built development (Millhanger Farmhouse) are fair.</i></p> <p><i>However, [Anon] notes that landscaping surrounding the property is not yet completed. [Anon] therefore anticipates that the visual impact of the development will soften over time as the vegetation establishes. [Anon] considers that this ought to be taken into consideration by Natural England.</i></p> <p><i>However, [Anon] respects Natural England's overall assessment of D12, and shares the desire for the boundary to be clear "on the ground". On balance, [Anon] does not object to the deletion of area D12: Land north of Chiddingfold Road, for the reasons given by Natural England.'</i></p>	
Object to proposed Deletion 12 and wish to comment on the boundary to include more land	<p><b>Of the 43 responses received for this area, 5 respondents provided a reason for their view, objecting to the deletion.</b></p> <p><b>ANON-PQ5Q-KRK2-1</b></p> <p><i>'I am disappointed that the area of Millhanger and Standing Wood has been removed from the area of the proposed designation. I understand that the land alongside Chiddingfold Road has been excluded due to development in this area and the boundary needs to move to the north here but the new proposal is a significant change from the original line. The area of D12 is stated as not having the same quality of landscape as the remainder of the designated area, this may arguably be the case but it is still attractive and as it is a significant incursion into the main area and visible from it, particularly from the footpaths bounding it, the setting is important for retaining the</i></p>	<p><b><u>Commentary</u></b></p> <p>Natural England has reviewed this area and maintains that the previous rationale for the proposed boundary is sound.</p> <p>Pages 15 to 16 above outline the key reasons for the proposed changes in this area, including the presence of visually prominent development, the loss of field boundaries, and the lack of the more intimate qualities typically associated with the landscape to the north and east.</p> <p>Natural England acknowledges the point raised by respondent <b>ANON-PQ5Q-KR3H-Y</b>, regarding mitigation of development through planting. However, the reasons for excluding this land also relate to its lower landscape quality.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>value of the surrounding area. It also seems to me that excluding this area is a green light for future development here which would certainly adversely affect the surrounding included area particularly to the east where views across the river valley include D12.'</i></p> <p><b>ANON-PQ5Q-KRK9-8</b>  <i>'This is a heavily wooded area with Badger sets and little recent development. It is also difficult to access. AONB designation will preserve these attributes.'</i></p> <p><b>ANON-PQ5Q-KRKH-Q</b>  <i>'Deletion makes boundary more complex.</i>  <i>The area around Mill house is worthy of including.'</i></p> <p><b>ANON-PQ5Q-KRQ5-A</b>  <i>'This should be designated AONB as there is a lovely view from bridlepath 285 as it goes towards the Chiddingfold Road.'</i></p> <p><b>ANON-PQ5Q-KRZY-Q</b>  <i>'There seems to be no justification provided in the report for this proposed deletion. In making the deletion it makes a significant indent salient in the proposed boundary.'</i></p>	<p>The landscape setting of an AONB/National Landscape designation is addressed in the current NPPF (Dec 2024) paragraph 189. AONB boundaries are not defined based on setting.</p> <p>Natural England also acknowledges concern regarding future development in this area. However, AONB designation does not prevent development and Natural England Guidance (Appendix 4) clearly states that <i>"land should not be included merely to protect it from specific development proposals."</i></p> <p>Natural England disagrees with the assertion that the proposed boundary is more complex. The new boundary is considered to be more clearly defined than the original boundary, which passed through Standing Wood and did not follow a clear boundary on the ground.</p> <p>Natural England agrees that there are views from bridlepath 285. The proposed boundary includes this route.</p> <p><b><u>Conclusion</u></b>  No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
<p><b>Include land in the southwest to the west of Plaistow Road and including Oaken Wood</b></p>	<p><b>ANON-VUXE-WSKM-A and ANON-VUXE-WMBA-F</b> Reasons include:</p> <ul style="list-style-type: none"> <li>• Wood is a reserve as part of Forestry Commission's Chiddingfold Forest.</li> <li>• One of the only locations in the South of England where you can find the rare Wood White Butterfly.</li> <li>• Outstanding biodiversity and nature.</li> <li>• Inclusion of significant areas of ancient woodland.</li> <li>• Natural England approach is too conservative.</li> </ul> <p><b>Boundary:</b> <b>ANON-VUXE-WMBA-F</b> wished to see Oaken Wood included in the proposed extension.</p>	<p><b>Commentary</b></p> <p>The Natural Beauty Assessment stated at page 185 that '<i>The natural and cultural interest of this landscape continues to the south including extensive areas of ancient woodland, important and highly valued habitats for rare species, and various listed buildings. However, moving south, the landscape becomes flatter and topographically less varied, woodland views become progressively more contained and the composition of landscape features less distinct. This, coupled with the greater distance from the greensand hills to the north, means that the area's scenic qualities are in transition, and whilst comprising areas of attractive countryside, the landscape is overall considered to lack the outstanding compositions found in the north.</i></p> <p><i>The transitional nature of the landscape means that there is no sharp barrier between areas of differing quality. As stated in Natural England Guidance 'Care will be required at the boundary setting stage to draw the boundary 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, i.e. it should be drawn conservatively. Visual associations may also be used to help define the extent of land for inclusion in these circumstances.'</i></p> <p>It went on to state on page 186 that '<i>As noted above, the transitional nature of landscape moving away from the distinct topography and backdrop of Hascombe Hill within the AONB requires scrutiny. It is acknowledged that land to the south has many natural and cultural features of interest and is an intact and tranquil landscape. However, it is also acknowledged that these qualities are characteristic of much of the Low Weald, and that the presence of these qualities does not necessarily make a landscape of national significance.</i></p> <p>The Boundary Report at page 54 stated that '<i>The proposed boundary includes significant areas of ancient woodland and an additional area of the Chiddingfold Forest SSSI. However, given the significant woodland cover in this landscape, and extent of the Chiddingfold Forest SSSI, it has not been possible to include all of these areas within the proposed boundary. This is not unusual where natural heritage designations cover significant areas. The natural beauty of the landscape for inclusion</i></p>

Boundary		
Theme	Representations	Natural England Commentary
		<p><i>in the AONB designation is the primary consideration. As noted in the natural beauty assessment this area of low weald landscape is in transition - the proposed boundary is drawn to include those areas of highest quality, taking account of landscape condition, scenic quality (including visual association with the greensand hills) and features of interest.'</i></p> <p>Natural England has reviewed these judgements. However, given the conclusion to pull the boundary back north of Chiddingfold Road (see above), Oaken Wood lies even more remotely from the wider area of qualifying land.</p> <p>For these reasons, Natural England is of the view that the boundary should not be drawn further south to include Oaken Wood, although it is acknowledged that it has particular natural heritage value.</p> <p><b>Conclusion</b> No change.</p>
Inclusion of whole of the Parish of Dunsfold	<p><b>ANON-VUXE-WEGW-2</b> <i>'[Anon] wishes to note that it would be generally supportive to the proposed boundary being extended even further to include the whole of Dunsfold Parish, in the event that Natural England is minded to revisit its conclusions more widely on the basis of other consultation responses.'</i></p> <p><b>ANON-VUXE-WESM-4</b> <i>'I am disappointed that the boundary does not include the whole of the parish and provide a link with the South Downs National Park.'</i></p>	<p><b>Commentary</b></p> <p>Natural England Guidance states that <i>'A settlement does not equate to a parish and the division of parishes is acceptable in drawing a boundary.'</i> Natural England is therefore of the view that the proposed boundary, which does not include all of Dunsfold Parish, is not contrary to Natural England guidance.</p> <p>Natural England does not consider that the land in the south of the Parish meets the Natural Beauty Criterion. The reasons for this relate primarily to the transitional nature of the landscape as set out above.</p> <p>Even if the whole of the Parish was included, this would not result in a physical connection to the South Downs National Park which lies further to the south west.</p> <p><b>Conclusion</b> No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
Inclusion of wider area which extends east as far as Park Copse and south to the County Boundary	<p><b>ANON-VUXE-WEWN-9 and ANON-VUXE-WEV7-H</b> wished to see a much wider area, included within the proposed extension.</p> <p>Reasons given include:</p> <p><b>Natural Beauty:</b></p> <ul style="list-style-type: none"> <li>• Areas of transition are in the east, not in the south west.</li> <li>• Scenic quality is declining to the south but not to the degree to outweigh positive aspects of visual interest and patterns.</li> <li>• Views of Sidney Wood and Chiddingfold Forest seen from Hascombe Hill.</li> <li>• South-west is heavily wooded and remote demonstrating tranquillity.</li> <li>• Swathes of ancient woodland associated with Chiddingfold Forest – more than in proposed extension including Sidney Wood and Durfold Wood.</li> <li>• Ancient woodland of fields and woods – little change over 130 years.</li> <li>• Former Wey and Arun Canal (subject to a restoration project) and glassmaking industry centred on Sidney Wood.</li> <li>• Burningfold Furnace and Forge important unique heritage feature.</li> <li>• Centre for historic glassmaking known to have been in Sidney Wood.</li> <li>• Historic settlement pattern...remains intact applies across EA13.</li> <li>• Development along Plaistow Road is limited and localised.</li> </ul>	<p><b>Commentary</b></p> <p>The Natural Beauty Assessment noted many of the qualities noted by respondents including the vernacular buildings in Alford, the Wey and Arun Canal which passes through Sidney Wood as well as the glassmaking heritage with which this area is associated (pages 184 and 185).</p> <p>In relation to Alford, it stated (page187) <i>'Alford, which is also a conservation area, with a high concentration of vernacular 17<sup>th</sup> century buildings and strong sense of place, has not been included within the Candidate Area. Its immediate landscape context is transitional and whilst having many attractive qualities, it is separated from the wider tract of qualifying land and is less influenced by the greensand hills to the northwest. On this basis it has been excluded from the Candidate Area.'</i></p> <p>The transitional aspects of the landscape which influenced the definition of the Candidate Area and subsequent boundary are detailed above. Natural England acknowledges that the Low Weald, despite being transitional, also contains areas of ancient woodland and significant woodland which is valued for its habitat and species. However, Natural England is of the view that this landscape is transitional and does not agree that the settlement pattern remains intact across the area and notes some linear development along lanes and also the B2133 in the east.</p> <p>Ancient woodland, which forms part of Chiddingfold Forest, has been significantly replanted and contains an extensive area of conifer plantation. Furthermore, the presence of ancient woodland is not a determinant in itself for land qualifying for designation.</p> <p>In addition, views from the existing AONB across this area are not sufficient to justify the inclusion of land which, of itself, is not regarded as meeting the Natural Beauty Criterion.</p> <p>The desirability arguments which have been put forward are addressed in Appendix 2.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> <li>Incongruities are not present to any great extent and judgements on scenic quality are subjective.</li> <li>Chiddingfold Forest is under active management, as is Sidney Wood.</li> <li>Representative of the unique Wealden landscape and settlement pattern and worthy of protection.</li> </ul> <p><b>Desirability:</b></p> <ul style="list-style-type: none"> <li>Concerns that Area of Great Landscape Value designation will lapse in the key areas to the south/west after the AONB review is concluded. In that case, existing protection of these areas of EA13 will not automatically continue, and risks being lost altogether. These areas of beauty, tranquillity, unique landscape quality and heritage would be placed at greater risk of suffering degradation.</li> <li>Ensure that the extension of the AONB is fully consistent with our Neighbourhood Plan, aiding the landscape and environment protections being sought by the local community and not removing existing protections.</li> <li>Issues detailed in Desirability Report apply to wider EA13.</li> <li>Designation would assist current conservation activity in the area including woodland management and heritage restoration/access (canal and glassmaking sites).</li> </ul>	<p>Natural England agrees that land south of the proposed boundary also contains heritage features of value but does not agree that these have been underplayed compared with similar features in the proposed extension to the north. This is because, when making judgements in relation to natural beauty, it is the weight of overall evidence which is important, having assessed each of the natural beauty factors, not the presence or absence of features of interest. Furthermore, Natural England Guidance (Appendix 4) states that, when defining a boundary in a transitional landscape, it should be drawn conservatively and that <i>'Visual associations may also be used to help define the extent of lands for inclusion in these circumstances.'</i></p> <p>Natural England agrees the area is representative of the Low Weald landscape and contains areas of attractive countryside which extend all the way to the South Downs. Natural England has sought to include land which is closely associated with the Surrey Hills and where scenic quality is lifted above attractive countryside, given its proximity to the Greensand hills and Hascombe Hill.</p> <p>This approach is consistent with that which was applied during the definition of the extent of the South Downs National Park. At the South Downs National Park Inquiry consideration was given to the inclusion of the Plaistow and Kirdford area, which lie within the Low Weald, just beyond the Surrey County boundary. The Inspector concluded, in relation to this area, at para 7.179 that <i>'I consider that the objection area is by and large an attractive tract of generally unspoilt and tranquil countryside with no landscape detractors.'</i> He went on to state (para 7.180) <i>'I have far less difficulty accepting that the objection area is of considerable nature conservation value.'</i></p> <p>At paras 7.182 and 7.183 he states <i>'The Agency argues that as one travels eastwards through the objection area the landscape becomes more open, less undulating and lower in quality. Having visited the area on many occasions, I accept that there is a gradation in character and quality though the changes are subtle rather than significant.....There is, however, one matter where change occurs progressively and more obviously across the objection area, namely the extent to which the</i></p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><b>Boundary:</b></p> <ul style="list-style-type: none"> <li>Proposed boundary does not follow clear features on the ground.</li> </ul> <p>Boundary options include:</p> <ol style="list-style-type: none"> <li>Extending east as far as Park Copse and south to the County Boundary.</li> <li>A larger area extending from the South Downs National Park at White's Hill in the southwest, along the County boundary to the B2133 at Alfold, northward along the B2133 to Alfold Crossways, and then along Dunsfold Road-Alfold Road to the currently proposed boundary extension at Dunsfold Common.</li> </ol> <p><b>ANON-PQ5Q-KRBQ-Q</b>  <i>'I am disappointed to note that [Anon's] comments on the previous consultation have been ignored. Whilst I understand that the first consultation is obsolete, our comments with regards to extending the boundary towards Alfold village's western boundary still remain very valid. We firmly believe that the boundary of Map 27B should be extended out towards the western boundary of Alfold which would</i></p>	<p><i>landscape 'borrows character' from the core areas. This concept essentially refers to the availability or otherwise of visual links.'</i></p> <p>At para 7.187 the Inspector concludes <i>'While I understand why the designation boundary within this transitional area could be described as conservative, I do not accept that it is necessarily inappropriate.....Beyond the designation boundary there are other areas of land of high landscape quality and especial nature conservation value.....but the visual links to the Greensand ridges to the west and to a lesser extent the overall quality of the landscape, tends to decline as one travels eastwards.'</i></p> <p>The judgements made by Natural England, in relation to the boundary in the Dunsfold area, are consistent with judgements made in the South Downs.</p> <p>Desirability reasons put forward by respondents in relation to the future of the AGLV and conservation activity are addressed in Appendix 2.</p> <p>Natural England does not agree that the suggested boundaries proposed by respondents, reflect a line which is drawn conservatively within an area of transition. For these reasons, Natural England is of the view that the boundary should not be extended further to the south or east.</p> <p><b>Conclusion</b> No change.</p> <p><b>Commentary</b></p> <p>Land to the east towards Alford was not included in the initial area of search and provisional Evaluation Area EA13. Following the Call for Evidence and receipt of detailed submissions, EA13 was extended to include the settlement of Alford to the east (refer to Figure 8 of the First Statutory Consultation drawings).</p>



Boundary		
Theme	Representations	Natural England Commentary
	<p><i>take into consideration the special nature and vistas in the area. Alfold has a wealden historic centre, is a diverse settlement and rich in local history which is added to by the tapestry of fields and open spaces in the area between Dunsfold and Alfold. Our report details this further.'</i></p> <p><b>ANON-PQ5Q-KRTZ-J</b>  <i>'I have already downloaded [Anon's] response to the previous consultation and it would appear that none of our comments were referred to in the new consultation. We firmly believe that the boundary of Map 27B should be extended out towards the western boundary of Alfold which would take into consideration the special nature and vistas in the area. Alfold has a wealden historic centre, is a diverse settlement and rich in local history which is added to by the tapestry of fields and open spaces in the area between Dunsfold and Alfold. Our report details this further.'</i></p> <p><i>'[Anon] are very concerned that our previous consultation response (which was comprehensive) seems to have been completely ignored in the second consultation of the AONB boundary review. I have attached our previous report which is of the same view as in this consultation and I would urge you to consider our comments as part of the current consultation.'</i></p> <p><b>The conclusions of the previous report are summarised below for completeness:</b></p>	<p>The Natural Beauty Assessment considered land within EA13 on pages 184 to 185. This is detailed in the commentary above and not repeated here.</p> <p>Natural England does not accept that the evidence previously submitted during the Call for Evidence has been ignored, not least because it influenced the extent of EA13, but also due to the specific references made in the Natural Beauty Assessment Report.</p> <p>Natural England agrees that much of the Low Weald comprises an intact, deeply rural and tranquil landscape, frequently heavily wooded. These qualities are expressed over a wide area between the Surrey Hills AONB and the South Downs National Park. Nevertheless, it is noted that, despite its qualities, the Surrey Hills nor the South Downs includes significant tracts of this landscape. As noted above, the decision by the South Downs Inspector not to include the area of Plaistow and Kirdford within the South Downs National Park clearly indicates why this is the case.</p> <p>However, Natural England has reviewed again the response provided by <b>ANON-VUXE-WEWN-9</b> and <b>ANON-PQ5Q-KRTZ-J</b> which requested the inclusion of land further to the south, and west as far as the Surrey County Boundary.</p> <p>Natural England has taken each of the points raised in turn to address concerns that points have been ignored:</p> <ol style="list-style-type: none"> <li>1. Natural England agrees that in the area south and west of the proposed boundary extension there is landscape which is in good condition, intact and strongly expresses Low Weald character. This was recorded in the Natural Beauty Assessment, albeit there is some conifer plantation within areas of ancient woodland and areas of small-scale development along lanes.</li> <li>2. The Natural Beauty Assessment highlights that, in this area, scenic qualities relate to undulating topography, wooded ghyll-streams, narrow ravines, pasture fields and woodland enhanced by rural buildings, and views to the greensand hills which lift scenic qualities and compositions. Natural England considers the variation in scenic quality across EA13 is critical in defining an area which is regarded as nationally outstanding. This is consistent with decisions made by the South Downs Inspector. Where there are views from the Low Weald to the Greensand Hills they need to be of sufficient close proximity, and the presence</li> </ol>

Boundary		
Theme	Representations	Natural England Commentary
	<ol style="list-style-type: none"> <li>1. The landscape quality noted within the proposed extension area also applies to land to the south and west and the incongruous features noted in the natural beauty assessment do not apply.</li> <li>2. Agree scenic quality is declining to the south but disagree this is so strong as to outweigh the positive aspects of scenic beauty, which relate to glimpses to the greensand ridge. Land in the south and west also fall within the zone of visual influence of the existing National Landscape.</li> <li>3. We agree with Natural England's conclusions on relative wildness and note they apply equally to the south and east.</li> <li>4. We agree with Natural England's conclusions on relative tranquillity but note that they apply equally to the area to the south and east. Alford Neighbourhood Plan establishes a policy to protect dark skies.</li> <li>5. The extent of ancient woodland, woodland under management and SSSI woodland are more prevalent in the south and west than in the proposed extension area and this weighs heavily in favour of designation.</li> <li>6. Unique features of heritage interest include the Wey &amp; Arun Canal, Burningfold Furnace and Forge and Sidney Wood Glassworks, and this weighs heavily in favour of designation.</li> <li>7. The proposed boundary follows better clearer features than the Natural England proposed boundary.</li> </ol>	<p>of surrounding hills sufficiently influential on composition and sense of place to justify inclusion. Conversely, the visibility of land from a National Landscape i.e. views from the Greensand Hills to the Low Weald does not justify inclusion of large swathes of Low Weald.</p> <ol style="list-style-type: none"> <li>3. No further comment.</li> <li>4. Policy within Alford Neighbourhood Plan relies on CPRE 'nightblight' mapping which indicates that the areas of darkest night sky correspond with Sidney Wood area and land further west. This same evidence informed the Natural Beauty Assessment for relative tranquillity.</li> </ol> <p>5 &amp; 6. Natural England Guidance is clear that when considering natural and cultural features of interest, it is not simply their presence or absence which is of relevance but rather their contribution to the natural beauty of the area overall. The Natural Beauty Assessment highlights the presence of woodland, including ancient woodland across EA13 as well as heritage features. Natural England was aware of the features of interest in its assessment of natural beauty. It also specifically mentions the Burningfold Furnace, Wey and Arun Canal and also the importance of glassworking (although Sidney Wood was not specifically named).</p> <p>In the Natural Beauty Assessment conclusions (page 185 - 186), it states that <i>'The natural and cultural interest of this landscape continues to the south including extensive areas of ancient woodland, important and highly valued habitats for rare species and various listed buildings. However, moving south the landscape becomes flatter and topographically less varied, woodland views become progressively more contained and the composition of landscape features less distinct. This coupled with the greater distance from the greensand hills to the north, means that the area's scenic qualities are in transition, and whilst comprising areas of attractive countryside, the landscape is overall considered to lack the outstanding compositions found in the north.'</i></p> <ol style="list-style-type: none"> <li>7. It is not unusual for a range of different boundary options to exist each following clear features on the ground. Natural England notes that the respondent's</li> </ol>

Boundary		
Theme	Representations	Natural England Commentary
	<p>8. The proposed area for inclusion remains intact and representative of a unique Wealden landscape.</p> <p>9. Should designation not take place, these features will be at greater risk of inappropriate development.</p>	<p>proposed boundary includes features of interest they wish to have included. The Boundary Considerations Report sets out the justification for defining the boundary further to the north. Natural England remains of the view that the proposed boundary (including the proposed deletion at D12) remains robust.</p> <p>8. Natural England agrees that this area does reflect a good example of Low Weald landscape but, as noted above and by the South Downs Inspector, this does not make the area nationally outstanding.</p> <p>9. Natural England acknowledges concern regarding areas outside of the proposed extension being vulnerable to inappropriate development – this point is addressed in Appendix 2 page 10.</p> <p>Having reviewed all information, Natural England remains of the views that previous judgements are sound.</p> <p><b>Conclusion</b> No change.</p>
Requests for Exclusion of Areas		
Exclude the village of Dunsfold and land to the east	<p><b>ANON-VUXE-WEW3-E</b></p> <p>Reasons include:</p> <p><b>Natural Beauty:</b></p> <ul style="list-style-type: none"> <li>Area of Great Landscape Value (AGLV) does not necessarily mean land is worthy of AONB status</li> <li>The proposed extension areas were not considered of 'outstanding beauty' when the first area designation was made in the late 1950's and much urbanisation of the area, including the M25, has happened since.</li> </ul>	<p><b>Commentary</b></p> <p><b>Response to ANON-VUXE-WEW3-E:</b></p> <p>Natural England agrees that AGLV status does not necessarily mean land is worthy of designation as AONB. For land to be designated as AONB, it must meet the statutory test of natural beauty. This is why land within each of the Evaluation Areas has been assessed against the natural beauty factors as set out in Natural England Guidance.</p> <p>The Surrey Hills AONB boundary, as defined in the late 1950's, reflected current circumstance at the time and took account of the fact that the M25 would be constructed. The boundary also reflected planning applications and administrative boundaries and preferences at the time. The boundary review undertaken by Natural England has involved rigorous assessment and has identified land which is worthy of</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><b>Issues in Dunsfold</b></p> <ul style="list-style-type: none"> <li>Planning application WA/2022/03032 (land at Coombebury Cottage) as a site case study.</li> <li>Site lies adjacent to allocated site for 12 dwellings in Dunsfold Neighbourhood Plan.</li> <li>The proposed boundary extension would 'wash over' the settlement and would be bounded by Dunsfold Aerodrome to the east.</li> <li>The 2007 Chris Burnett Associates study distinguished land to the west of the village from land to the east, the former having <u>identical</u> characteristics, and the latter <u>some</u> of the characteristics of the wooded Weald Fringes.</li> <li>Boundary was too tightly drawn around the settlement and does not take anticipated growth into account.</li> </ul> <p><b>Desirability:</b></p> <ul style="list-style-type: none"> <li>Impact on housing delivery – proposals place a constraint on meeting future housing need.</li> <li>Reduced land availability for development – land is already affected by other statutory constraints such as Green Belt.</li> <li>Increased planning restrictions - more complex and expensive design and construction processes.</li> <li>Higher construction costs and therefore higher house prices.</li> </ul> <p><b>ANON-VUXE-WEXK-7</b></p>	<p>AONB designation as part of the Surrey Hills AONB and has set out the evidence to support this in detailed technical reports.</p> <p>Natural England is aware of the site allocations in the Neighbourhood Plan and planning application (WA/2022/03032) on land northwest of Dunsfold. This latter site was refused by Waverley Borough Council and is currently at appeal and is undecided at the time of writing. As a result, it is not a current planning permission nor allocation in the Local Plan or Neighbourhood Plan.</p> <p>Natural England accepts that no specific reference was made in the Natural Beauty Assessment and Boundary Report to current planning application WA/2022/03032 (which came forward in late 2022) and allocations made in the draft Regulation 15 Dunsfold Neighbourhood Plan (which has been withdrawn and is currently being amended). In light of the current status of the planning application and withdrawn Neighbourhood Plan, none of the identified sites carry weight at this stage. Nevertheless, should circumstances change before a Designation Order is submitted to the Secretary of State, this would need to be reviewed.</p> <p>Natural England does not agree that the proposed boundary extension 'washes over' the village of Dunsfold. The qualities of the village were described in the Natural Beauty Assessment. The condition of the village was noted on page 182 which took account of more recent development at Griggs Meadow and Nugent Close to the east of the village (page 182). In the conclusions on page 187 it states that <i>'the settlement of Dunsfold is considered to meet the natural beauty criterion as a result of its largely intact historic character, strong vernacular and sense of place and outstanding landscape setting which flows into the village, in part due to its central open common and loose arrangement of buildings.'</i> The settlement was therefore included on its merits.</p> <p>Natural England agrees that the Chris Burnett Associates study (2007) did distinguish between the east and west of the village. However, the Natural Beauty Assessment sets out at paragraph 3.4.5 that the Chris Burnett Associates review of the Area of Great Landscape Value did not follow Natural England Guidance. The review was based on character and not the evaluation of factors and indicators which contribute</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p>Requested the exclusion of land east of Dunsfold and the village itself.</p> <p>Reasons given include:</p> <ul style="list-style-type: none"> <li>Inclusion of site proposed for allocation within the Dunsfold Neighbourhood Plan – inconsistent with exclusion of the allocated development at the aerodrome.</li> <li>Proposed extension area does not coincide with Hankinson Duckett area (2013) and draft possible Area of Search (2021), the justification for considering a larger area and proposing a larger area for designation has not been evidenced.</li> <li>Assessment of natural beauty heavily relies on landscape character assessment.</li> </ul> <p><b>Natural Beauty:</b></p> <ul style="list-style-type: none"> <li>Land east of Dunsfold is actively managed and pleasant countryside but not such quality and condition to warrant a statutory designation.</li> <li>Village has dichotomy in terms of urban grain – west comprises loose vernacular housing, and east more recent development which is in keeping with the character of the village.</li> <li>More recent development to east of the village causes increased light spill and affect local character.</li> <li>Land east and northeast of Dunsfold is not specifically mentioned in Natural Beauty Assessment.</li> </ul>	<p>to natural beauty. It therefore cannot be relied upon in making judgements regarding natural beauty.</p> <p>In any event, Natural England does not agree that land to the east of the village does not exhibit the same qualities as land to the west and that the latter has a stronger relationship with the AONB. Natural England considers that land on both sides of the village has a strong connection to the wider Greensand hills and express scenic qualities derived from undulating topography, woodland, pasture fields, small ghylls and vernacular buildings.</p> <p><b>Response to ANON-VUXE-WEXK-7:</b> The status of the planning allocation at Dunsfold Aerodrome is not the same as the status of proposed allocations in the Neighbourhood Plan which has now been withdrawn. Natural England Guidance is clear that, at the boundary definition stage, land allocated for development on the margins of qualifying land or having the benefit of planning permission, should normally be excluded (Appendix 4). Prior to the Designation Order being submitted to the Secretary of State, any changes to the planning status of land should be kept under review.</p> <p>There is no reason for the proposed extension area to coincide with the Hankinson Duckett Associates assessment or with the draft Area of Search. The latter was set out by the Management Advisory Group for the Surrey Hills Boundary Review at the start of the project and subsequently revised and extended when defining the Evaluation Area for the Natural Beauty Assessment. Detailed evaluation of Evaluation Area 13 has been set out in the Natural Beauty Assessment. Natural England Guidance makes it clear (para 4.4) that <i>'The use of Evaluation Areas is intended merely to make the practical work of detailed evaluation of landscapes more manageable. It is not intended to lead to the designation, or exclusion from designation, of any land merely because of the way in which Evaluation Areas have been defined.'</i> The Hankinson Duckett Associates study has not been relied upon in the Assessment but does provide useful background information.</p> <p>Natural England agrees that the assessment of natural beauty does require an understanding of character and that this informs the definition of Evaluation Areas and</p>

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	<p><b>Desirability:</b></p> <ul style="list-style-type: none"> <li>AONB designation is an unnecessary high benchmark to guide development.</li> <li>The current character of the settlement of Dunsfold and surrounding open countryside has been successfully protected through policy and the landscape character assessment.</li> <li>Proposed extension of AONB at Dunsfold is unnecessary given existing Area of Great Landscape Values (AGLV) and Conservation Area planning constraints.</li> <li>Designation would cause an unnecessary constraint on development and other allocated sites in the village.</li> </ul> <p><b>Boundary:</b> No alternative boundary is put forward by <b>ANON-VUXE-WEW3-E</b></p> <p><b>ANON-VUXE-WEXK-7</b> suggested the AONB extension boundary should stop at the eastern edge of Dunsfold's settlement boundary or exclude the settlement altogether.</p> <p>An indicative boundary is proposed along Dunsfold Common Road and then west of the settlement and then along Wrotham Hill.</p>	<p>also the gathering of evidence in relation to the Natural Beauty Assessment. Landscape characterisation (the description of a landscape) is not, however, the same as landscape evaluation which requires judgments to be made relating to the value of the landscape (para 3.7 of Natural England Guidance).</p> <p>Natural England agrees that the land surrounding Dunsfold is actively managed but disagrees that it is not worthy of designation as AONB for the reasons set out in the Natural Beauty Assessment. Land east of Dunsfold is mentioned in the Assessment – the description of the area under scenic quality which states <i>'Between the streams are small pasture fields defined by thick hedges and sinuous belts of woodland, creating a small-scale intimate landscape with a delightful mix of interest and visual variety. This is enhanced by rural buildings built of traditional materials including Bargate stone, red brick, timber and clay tiles, for example at High Loxley....'</i> is relevant to land east of Dunsfold. In addition, the conclusions of the Assessment state that the <i>'combination of topography, cultural and natural heritage and land uses combines to create scenic compositions and a landscape which meets the natural beauty criterion.'</i></p> <p>The Boundary Report noted that <i>'the boundary was drawn in, west of the Aerodrome, excluding the large barns and development in the vicinity of New Pond Farm, as well as areas of equestrian use. These areas were considered to be of lesser quality as a result of fragmentation and management, but also due to less distinctive typography and fewer wider views.'</i> It is clear therefore that the assessments sought to exclude lesser quality land east of the village where it exists.</p> <p>Natural England has reviewed this in light of responses to the Statutory Consultation. Natural England consider that land to the east of Dunsfold expresses natural beauty due to visual association with the Greensand hills to the north, its enclosure pattern comprising medium irregular assarts and copses with wavy boundaries, as well as regular assarts with straight boundaries.</p> <p>In terms of the grain of the settlement, Natural England notes that there are some areas of more recent housing development on the eastern side of the village but also notes that these are not of sufficient scale or prominence to adversely affect the</p>

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		<p>qualities of the village or surrounding landscape. Natural England also does not accept that any increase in night lighting adversely affects the ability of land east of the village to qualify for designation.</p> <p><b>Desirability:</b> Desirability issues are considered in detail in Appendix 2.</p> <p><b>Boundary:</b> Natural England has reviewed the alternative boundary put forward but remains of the view that the proposed boundary is appropriate for the reasons given above.</p> <p><b><u>Conclusion</u></b> No change.</p> <p><b><u>Commentary</u></b></p> <p>Planning application WA/2022/03032 (Land at Coombebury Cottage, The Green) which was not approved at the time of the Surrey Hills Boundary Review Consultation in 2023, has subsequently been granted on appeal (in May 2024). The approved application is for 52 dwellings in a parcel of land within the proposed extension area, to the east of Dunsfold Green and directly north of development at Gratton Chase (also within the proposed extension area). Natural England has reviewed this and notes the adverse effects of the scheme acknowledged by the Inspector and the urbanising effects of the associated Common Land Application raised by Waveney Brough Council. On balance, Natural England considers that the settlement of Dunsfold still expresses exceptional qualities and that it sits within a wider area of qualifying land. Natural England also notes the potential for further litigation associated with this site. Given this, Natural England remains of the view that there should be no change to the proposed extension area. Nevertheless, this should be kept under review prior to the submission of the Designation Order to the Secretary of State.</p> <p><b><u>Conclusion</u></b> No change.</p>

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