

Appendix 21: Minor Boundary Refinements

Please refer to Figures 25b and 28b

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

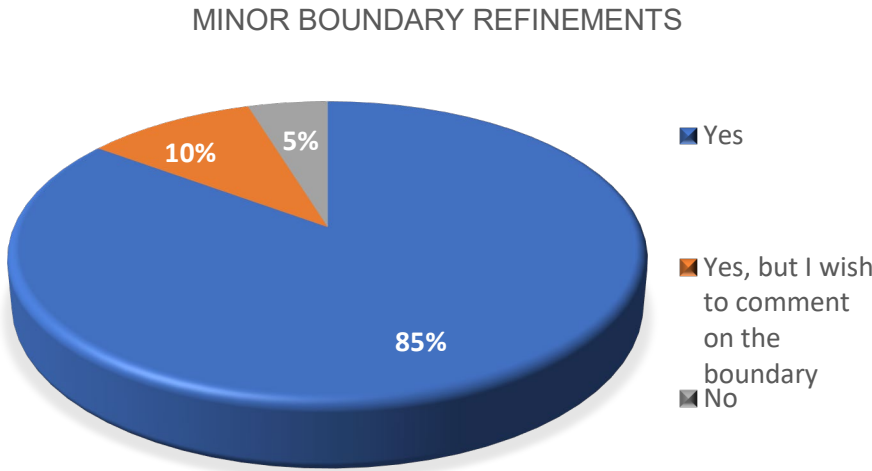
Question B1: Should the Minor Boundary Refinements be designated as part of the Surrey Hills AONB?

Yes	411
Yes, but I wish to comment on the boundary	49
No	23

Of the 483 respondents who answered question B1, 411 (85%) felt that the Minor Boundary Refinements should be designated as part of the Surrey Hills AONB and 23 respondents (5%) did not. 49 respondents (10%) agreed but wished to comment on the boundary.

The table below considers each minor boundary refinement referred to by the respondents in its relevant geographical area, and are considered in the following order:

- Guildford
- Busbridge and Catteshall
- Bookham
- Oxted
- Dorking
- Haslemere
- Beacon Hill and Hindhead (formerly referred to as Grayshott)



Where minor boundary refinements were requested by respondents, but do not fall into the areas listed above, they have been considered in relation to the most relevant proposed Extension Area. For example, respondents who requested more land be included in the Godstone Area (**ANON-VUXE-WEXX-M** and **ANON-VUXE-WEU5-E**) have been considered in the Godstone Extension Area Analysis Table (Appendix 16).

A further Minor Boundary Anomaly was raised during the Statutory Consultation namely Redhill Common, and this is addressed at the end of the table.

During the second (2024) statutory consultation, an additional response was received relating to **Addition 25: Land west of Dorking, Addition 26: Land at Red Court and Addition 27: Land west of Bunch Road** as well as **Deletion 13: Land at Weydown Road Carpark**. Natural England has reviewed these areas and provided further commentary in blue below.

Further responses were also received, all relating to **land at Bocketts Farm Park and Hawk's Hill, as well as Chichele Road**. Natural England has reviewed these areas and provided further commentary below in blue.

Guildford		
<u>Area</u>	<u>Representations</u>	<u>Natural England Commentary</u>
General Support	<p>ANON-VUXE-WSK1-E and ANON-VUXE-WMEQ-2 support the inclusion of The Mount.</p> <p>ANON-VUXE-W53-Z, ANON-VUXE-WMAW-4, ANON-VUXE-WMG8-B, ANON-VUXE-W5GT-F and ANON-VUXE-WMZP-P support the inclusion of The Mount and Land South of Woodcote.</p>	<p><u>Commentary</u></p> <p>Natural England notes the support for the proposed boundary and has provided a detailed commentary to issues raised by respondents which can be found below.</p>
Land South of Warren Road	<p>ANON-VUXE-WSQA-4, ANON-VUXE-WSK1-E and ANON-VUXE-W5H4-G requested inclusion of Land South of Warren Road.</p> <p>Reasons include:</p> <ul style="list-style-type: none"> • Existing AONB runs along property boundaries • Entry point into the AONB • Cowslips in the pastures • Public rights of way across the area. 	<p><u>Commentary</u></p> <p>This area was assessed as part of the Boundary Assessment Report (page 60) which concluded that <i>‘This land has an urban fringe character comprising horse paddocks and is influenced by adjoining back gardens and curtilage fencing which affect its overall condition. This landscape relates more closely to the urban edge than wider countryside, and slopes towards the built edge. Although the current AONB does not follow a clear line on the ground, this land is not considered suitable for designation within the AONB.’</i></p> <p>As a result of this analysis no change was proposed to the boundary.</p> <p>Natural England has reviewed this in light of the evidence put forward by respondents. Natural England notes that the majority of the public right of way falls within the existing AONB designation. It also acknowledges that in some cases the AONB does extend up to the urban edge. In this instance, the land in question comprises small scale paddocks used for horse grazing. This land use, the separation of the land from the wider sweep of the AONB, and the sloping nature of the site towards the urban edge, has led Natural England to the same conclusion as previously given.</p> <p><u>Conclusion</u></p>

Guildford		
<u>Area</u>	<u>Representations</u>	<u>Natural England Commentary</u>
		No change.
The Mount	<p>ANON-VUXE-W53-Z, ANON-VUXE-WMAW-4, ANON-VUXE-WMG8-B, ANON-VUXE-W5GT-F and ANON-VUXE-WMZP-P ANON-VUXE-WSK1-E and ANON-VUXE-WMEQ-2 support the inclusion of The Mount.</p> <p>ANON-VUXE-W5US-V (St Catherine's Village Association) requested inclusion of the road which leads to the bridleway to the west of The Mount. Reasons include:</p> <ul style="list-style-type: none"> • Would assist in protecting the edge and verge and bridleway character • Safeguarding the view north. 	<p><u>Commentary</u></p> <p>As noted on page 60 of the Boundary Report, the proposed boundary follows the southern edge of the lane known as the Mount. However, the proposed boundary does not include the southern grass verge and hedgerows which define the properties to the south. This is because this verge is affected by access driveways to properties and has a more manicured character. Furthermore, the southern edge of the road is a clearer boundary feature.</p> <p><u>Conclusion</u> No change.</p>
Land South of Woodcote	<p>ANON-VUXE-W53-Z, ANON-VUXE-WMAW-4, ANON-VUXE-WMG8-B, ANON-VUXE-W5GT-F and ANON-VUXE-WMZP-P support the inclusion of Land South of Woodcote.</p> <p>ANON-VUXE-W5US-V requested the inclusion of the remaining small parcel of land. Reasons include:</p> <ul style="list-style-type: none"> • Poor agricultural land • Adjoins the Pilgrims Way 	<p><u>Commentary</u></p> <p>Natural England has reviewed this area. It notes that the Pilgrim's Way footpath is already included within the AONB and considers the field relates more strongly to the urban area and is transitional in terms of quality and character. When assessing the suitability of including additional land within the AONB, Natural England considers the current condition of the landscape, not its future potential. Natural England is not aware of plans to rewild this land.</p> <p><u>Conclusion</u> No change.</p>

Guildford		
<u>Area</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<ul style="list-style-type: none"> Could be rewilded. 	

Busbridge and Catteshall		
<u>Area</u>	<u>Representations</u>	<u>Natural England Commentary</u>
Scizdons and Squirrel Hill	ANON-VUXE-WE5J-3 supports the boundary change at Scizdons and Squirrel Hill.	<u>Commentary</u> Natural England notes the support for the proposed boundary.

Bookham		
<u>Area</u>	<u>Representations</u>	<u>Natural England Commentary</u>
Land at Bocketts Farm Park and Hawk's Hill	ANON-VUXE-WEMM-X, ANON-VUXE-WECEB-9 and ANON-VUXE-WEMS-4 requested two areas: Firstly, the inclusion of the River Mole Nature Reserve, west of the River Mole and field east of the railway. Reasons include:	<u>Commentary</u> This area was assessed as part of the Boundary Considerations Report (Page 66) which concluded that <i>'the area had a fragmented character which is diminished by transport infrastructure and commercial activity. Although the AONB boundary does not follow clear features on the ground (except in the east), this land is not considered suitable for inclusion within the AONB.'</i> As a result, no change was proposed to the boundary.

Bookham		
Area	Representations	Natural England Commentary
	<ul style="list-style-type: none"> Local nature reserve. Important corridor leading into Leatherhead along river. Landscape on both sides deserves protection. Green Belt. <p>Secondly, Bocketts Farm Park either side of the A246. Reasons include:</p> <ul style="list-style-type: none"> Elderflower fields – important corridor free from development. AGLV. Green Belt. Attractive views. <p>ANON-PQ5Q-KR4B-T</p> <p><i>'We are strongly of the view that proposals for an extension at "Bocketts Farm Park and Hawk's Hill" (Bookham), that were made in June 2023 but not accepted, should be re-visited.'</i></p> <p>The respondent provided reasons why the landscape is not fragmented including:</p>	<p>Natural England has reviewed this in light of the evidence put forward by respondents. It acknowledges that this area includes two Sites of Nature Conservation Importance (SNCI) – Hawk's Hill, Cherry Orchard Farm and Bocketts Lane SNCI and River Mole Leatherhead SNCI. Natural England also acknowledges that the river forms an important corridor which stretches into the built-up area of Fairfield and Leatherhead. Nevertheless, the factors do not alter the fact that this landscape is fragmented and affected by transport infrastructure, commercial activity and urban fringe land uses and the river corridor has a more urban character as it extends northwards. Although the steep slopes offer some elevated views, the landscape itself is affected by its immediate context and by traffic noise.</p> <p>Natural England remains of the view that this area does not warrant designation as part of the AONB.</p> <p><u>Conclusion</u> No change.</p> <p><u>Commentary</u></p> <p>Natural England acknowledges the number of additional responses related to this area which have been received during the second (2024) statutory consultation.</p> <p>In light of these detailed responses, this area has been reviewed and a more in-depth response provided to address the specific issues raised by respondents.</p> <p>Perceived Fragmentation</p> <p>Fragmentation can be perceived both visually and physically. Natural England agrees that the elevated nature of this landscape affords views from Hawks Hill to</p>

Bookham		
Area	Representations	Natural England Commentary
	<ul style="list-style-type: none"> Due to topography and the fact that the road and railway are in a cutting, infrastructure is not visible and effectively inaudible. In views back to Hawk's Hill, Fetcham is barely visible from the area called the Junipers, whilst Leatherhead (and beyond) are visible - and of interest from a distance. <p>The respondent set out the qualities of the area including:</p> <ul style="list-style-type: none"> Hawk's Hill has landscape quality, scenic quality and surprising tranquillity. It has natural heritage features (cultivated elderflower bushes) and a meadow full of cowslips immediately to the NW of these. Immediately to the north is SES Water's Elmer Treatment Works (for drinking water supplied by Fetcham Springs). Their land includes flower-rich chalk grassland that has been surveyed and recognised by Surrey Wildlife Trust as a "Biodiversity Benchmark Site" - an accreditation given by the Wildlife Trusts. Therefore, though this neighbouring land use is a water treatment works, it is ecologically important. A major stretch of the River Mole between Dorking and Leatherhead is within the AONB - on the eastern bank extending as far as Thorncroft Bridge. On the western side, the AONB stops before the Young Street Car Park - which serves the AONB. The A246 passes north of the Car 	<p>the south and also southeast into areas of existing AONB and the proposed extension at Cherkley Court. In these views, the A246 and A24 are not visible as they are set down in the landscape or screened by existing vegetation. These elevated views give the impression that the landscape forms part of a continuous sweep of land with the existing AONB. Nevertheless, the A246 does physically fragment this area from the wider AONB along within the recreational development at Bocketts Farm. Natural England agrees that there is a need to improve the pedestrian crossing of this major road to connect into the AONB.</p> <p>Similarly, the railway line limits physical connectivity from Hawks Hill to the River Mole valley floor to just one pedestrian bridge crossing adjacent to the Leisure centre. Further physical fragmentation of the landscape is caused by the expansion of development at Bocketts Farm along the A246, as well as the travellers' site off Salvation Place, north of the A246.</p> <p>Qualities of the Water Works</p> <p>The Elmer's Treatment Works is noted as including flower rich chalk grassland which is ecologically important. The site itself is enclosed by fencing and signage and contains sizable buildings and infrastructure and the grassland areas it contains, whilst species rich, do not make a significant contribution to the natural beauty of the area. It lies immediately adjacent to the built edge of Fetcham and relates more strongly to this urban context.</p> <p>Land Use</p> <p>It is noted that land use on the slopes of Hawks Hill and to the east of the railway comprise elderflower orchards consisting of rows of bushes set within areas of rough grassland or land grazed by horses. This gives rise to an unkempt character which does not positively contribute to the natural beauty of the area. The fact that the Mole Gap Trail passes through this area does not provide a sufficient justification for including it within a boundary extension. The land along</p>

Bookham		
Area	Representations	Natural England Commentary
	<p>Park and the Leatherhead - Dorking railway to the west. But the Mole Gap Trail passes under the A246 Road Bridge and provides pedestrian connectivity to the proposed AONB extension, between a field with Elderflower shrubs (and sometimes grazing horses) and the tree-lined / wooded bank of the River Mole. The railway is far more visible in the existing AONB than it is in the proposed extension. The topography, land use and ecology are probably more interesting than on the AONB to the east of the river. There is a small Traveller Site (Salvation Place) just to the east of the railway, but it is very well hidden.</p> <ul style="list-style-type: none"> Rivers (such as the River Mole) are physiographic features, and the Boundary Variation Project presentation made it clear that open fields, wetlands and water courses are features of natural heritage interest. Furthermore, the River Mole between Norbury Park is of exceptional "natural" interest because in dry periods surface flows cease in this section (photos available on request) and only re-appear towards Thorncroft Manor. The River Mole is also an important wildlife corridor, parts on both east and west banks being a Local Nature Reserve. AONB designation of the catchment / fields on the west bank would complement the designation on the east bank - that the western side is not designated is a significant anomaly that should be rectified. 	<p>the valley floor which does have natural beauty is already within the proposed designation.</p> <p>To the south, the landscape within the existing AONB retains a more intact pattern of pasture and arable fields ,with patches of woodland and hedgerows. Similarly, the SNCI at Bocketts Lane, Leatherhead (valued for its calcareous grassland, including cowslips) retains its pastoral qualities and field enclosure pattern, however, it is isolated from the existing AONB by lesser quality land.</p> <p>River Mole Wildlife Corridor</p> <p>Natural England acknowledges the ecological interest of the River Mole but notes that it is already included within the existing Surrey Hills AONB, although it is recognised that the land to the west of the watercourse is not included within the designation. Consideration has been given to the definition of a new boundary along the Mole Gap Trail, to include the footpath and scrubby vegetation immediately adjacent to the watercourse. However, this was regarded as a less clear feature on the ground than the western bank of the river. The existing AONB regularly works beyond its boundaries in terms of conservation activity and there would be little benefit of extending the boundary to include this small sliver of land.</p> <p>Existing AONB Boundary Does not Follow Clear Features</p> <p>Natural England agrees that the existing AONB boundary in this area does not follow clear features on the ground. These boundary anomalies are only addressed where the inclusion of additional qualifying land can be justified. Where adjacent land is not considered to meet the Natural Beauty Criterion, then boundary anomalies are not addressed. In this instance, land adjacent to the boundary anomaly is not considered to meet the Natural Beauty Criterion for the reasons given above.</p>

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Area	Representations	Natural England Commentary
	<p>The respondent highlighted issues with the current AONB boundary including:</p> <p>The current boundary goes straight through the middle of the various buildings at Bocketts Farm. There is no clear rationale for the current boundary - it does not even follow the A246 road alignment which the boundary to the east does, adjacent to the A24. Bocketts Farm offers a wonderful opportunity for active open-air recreation for families and connects to the wider AONB (to the south) by a range of footpaths for more peaceful recreation. Towards the north, there is a footpath connecting directly to the proposed Hawk's Hill extension, with onward connections to the River Mole.</p> <p>Proposed boundary</p> <p><i>'It is time for this very erratic northern boundary of the AONB at Bocketts Farm to be rationalised and to encompass the important landscape and "natural beauty" of Hawk's Hill all the way down to the River Mole to join up with the AONB northern "spur" on the east bank of the river. It meets criteria of Landscape Quality, Scenic Quality, Relative Wildness and Relative Tranquillity and possesses Natural Heritage Features - including parts of a river focused Local Nature Reserve. River Mole Watch is actively monitoring the river to maintain and improve its quality and Trustees (e.g.[Anon]) are very supportive of this proposed extension and the organisation is surprised</i></p>	<p><u>Conclusion</u></p> <p>No change.</p>

Bookham		
Area	Representations	Natural England Commentary
	<p><i>that it was not adopted for further consideration in response to the first consultation.</i></p> <p><i>The boundary to be adopted should be the one in the Final Boundary Report section 5.4 Bookham P.65 or a slightly reduced area e.g. as shown in the first attachment.'</i></p> <p>ANON-PQ5Q-KRB7-W</p> <p>Land at Bocketts Farm Park and Hawk's Hill either includes or lies adjacent to areas designated as Area of High Archaeological Potential where significant finds have been made in the past.</p> <p><i>'These include a Saxon Cemetery and Iron Age Farmstead on Hawks Hill and evidence of Roman occupation close to the West Bank of the Mole north of Young Street. So the extensions proposed are close to or enclose areas of cultural heritage significance. One is also important for the [River] Mole as a natural corridor - linking the AONB to the Mole Local Nature Reserve in Leatherhead.'</i></p> <p>ANON-PQ5Q-KRB8-X</p> <p><i>'I do believe that the original "no change" in 2023 and the Consultation Analysis Report 2024 conclusion do not reflect the "Natural Beauty" of the area - it is of higher quality than the existing AONB land to the east of the</i></p>	

Bookham		
Area	Representations	Natural England Commentary
	<p><i>River Mole and the influence of commercial activity and urban fringe land is (surprisingly) negligible because of the topography. Even though the area is less than 15 minutes walk from my home in Fetcham, I had not appreciated fully its existence until the COVID lock-down. Shouldn't there be a mechanism for reconsidering this?'</i></p> <p>Evidence provided includes:</p> <ul style="list-style-type: none"> • information on Surrey Wildlife Trust Biodiversity Benchmark Award to SES Water's Elmer Treatment Works with for its conservation management • Areas of calcareous grassland • Hawk's Hill Saxon Cemetery • Bocketts Iron Age Farmstead • In the Natural England Commentary it is NOT correct to state that "the river corridor has a more urban character as it extends Northwards" • The River Mole is a significant and unusual Natural Heritage feature and its boundary needs to be clarified / rationalised in this area. • the significance of the area has been overlooked, perhaps through over-dependence on maps (aerial view of transport infrastructure and built development), lack of local familiarity and there being a number of factors involved - with information not readily accessible. • It is not correct for Natural England to state that "The landscape itself is affected by its immediate context and by traffic noise". It is probably much 	

Bookham		
Area	Representations	Natural England Commentary
	<p>less affected by such "impacts" than parts of the existing AONB to the south of the A246 - where the A24 to Guildford, and the Leatherhead - Dorking Railway, are much more prominent.</p> <p>ANON-PQ5Q-KRBD-A</p> <p><i>'The River Mole is a crucial part of this landscape through the Mole Gap. It is a very important natural wildlife corridor. It is an extremely popular walk along the river at Leatherhead, this is part of the designated Local Nature Reserve which stretches from Fetcham to Thorncroft bridge. From here the land rises up the hill with a footpath running all the way to the A246 and across to Bocketts Farm. There are fabulous views looking towards Leatherhead and the Surrey Hills. These fields, and the area, is historic, well loved and much used by walkers, dog walkers and horse riders as the main route from Leatherhead and Fetcham to reach Bocketts Farm and Norbury Park by crossing the A246.</i></p> <p><i>Local councillors, and local people are keen to see the crossing point improved because it is so well used, reinforcing the connection to Nobury [Norbury] Park and the existing ANOB [AONB].</i></p> <p><i>We would like to see the River Mole and the adjacent land to the south up to Hawkshill included in the ANOB [AONB] for all the detailed reasons given by ANON-PQ5Q-KRB8-X.</i></p>	

Bookham		
Area	Representations	Natural England Commentary
Land East of Dorking Road	<p>ANON-VUXE-WECEB-9, ANON-VUXE-WEZ7-N, ANON-VUXE-WS1C-6 and ANON-VUXE-W5U7-Z requested the inclusion of the Great Bookham Equestrian Centre. Reasons include:</p> <ul style="list-style-type: none"> • Green Belt and Area of Great Landscape Value. • Similar characteristics to the wider AONB • Share the same indigenous flora characteristic of chalk down-land and the same fauna. • Integral with that of the contiguous AONB • Logical extension of Norbury Park. • Together they form a single, continuous landscape. • Together they are part and parcel of one landscape. • Sits within a sweep of qualifying land. • Continuous area of open land. • Striking, spacious landscape. • Rolling landform within extensive views. • Essential contribution to the views over the AONB • Far-reaching views from it are best seen from the top of Crabtree Lane and the short track leading to the 'Admiral's Road'. • Views of the Surrey Hills. 	<p>Commentary</p> <p>This area was assessed during the Boundary Assessment as a minor boundary anomaly (page 65 of the Boundary Considerations Report). This site was described as follows:</p> <p><i>'This area of land has an urban fringe character and is predominately used for equestrian purposes, with associated fencing and stabling and a show ground. This has affected the condition and character of this landscape. This land is not considered suitable for inclusion in the AONB. Furthermore, the current AONB boundary is well defined following a public bridleway.'</i> No change to the existing boundary was recommended.</p> <p>The Boundary Report is clear that minor boundary anomalies have been reviewed where <i>'the existing AONB does not follow a clear feature on the ground, where the land in question relates strongly to the wider AONB forming part of a sweep of qualifying land, and where a suitable alternative boundary can be defined'</i> (page 45). In this instance, the issue revolves around the second of these.</p> <p>The existing AONB follows clear features on the ground, including the southern edge of the bridleway and the western edge of Dorking Road. However, Natural England notes that it excludes the bridleway which is an important landscape historic feature. Land east of Dorking Road falls within the Area of Great Landscape Value but outside of the built-up area as defined in the Mole Valley Local Plan.</p>

Bookham		
Area	Representations	Natural England Commentary
	<ul style="list-style-type: none"> While the AONB land to the South of the boundary differs in some ways from the excluded land to the North, both are essential to the visual integrity of the scene and in key respects they are identical. Delightful pastoral setting. 80 acres of well-kept pasture. Equestrian centre and lower landscape condition is accepted. In terms of land use, and in common with other parts of the AONB, both include fencing and other structures and are used for grazing horses. Features selected for mention in the evaluation are unrepresentative of the parcel of land as a whole – occur in northwest corner. None of the features mentioned above intrude visually on the scene. All are insignificant by comparison with the positive contribution of the extensive, open pastureland to the wider landscape. Surrounded on three sides by AONB Wash-over could be applied. Numerous working landscapes are ‘washed over’ to be included within the AONB. There are several such sites within a mile or so of the Equestrian Centre: a storage depot, a saw-mill, a mower works and several other equestrian properties. 	<p>East of Dorking Road, the land is gently undulating and slopes down towards the urban edge and Dorking Road. Vegetation on the margins of the site restricts views to the wider landscape from some locations. Nevertheless, Natural England acknowledges that, from the urban edge, the land is perceived as forming part of a wider sweep of landscape, extending up to the urban edge.</p> <p>The land is currently used as an equestrian centre and, although it is laid to pasture, it is subdivided by multiple post and rail fences. The field division along with other equestrian ancillary development and features such as jumps, field shelters and two sand schools, create visual clutter and alter traditional landscape patterns. While the stabling buildings retain a rural vernacular, signage and car parking impart a more commercial character. Overall, the condition of this landscape is materially affected by the current land use.</p> <p>This is most readily perceived when walking along the bridleway. From this recreational route there is a perceived distinction between the land to the south which retains the large-scale field pattern, typical of this landscape, affording open rural views to woodland, compared to the land to the south which is substantially subdivided by post and rail fencing and looks onto housing along the urban edge.</p> <p>Review of historic evidence has indicated that this land formed part of former common fields as late as the 1900s. By 1914, the farm buildings were in existence and the area subdivided into two fields with two small conifer plantations along the boundary division. By 1956, housing development to the north had been constructed. Aerial photographs show that the establishment of the Equestrian Centre was in existence in 1999 and that it has grown to its current extent since 2003. Planning history of the site shows that it was previously the subject of planning applications for residential development, in 1958, which was refused. Given that the Surrey Hills AONB was designated in</p>

Bookham		
Area	Representations	Natural England Commentary
	<ul style="list-style-type: none"> Clearly part of a single landform, working together to give a sense of openness and exposure to the sky, offering far-reaching views, blending in a smooth flow from the top of Crabtree Lane to the tree-line at Norbury Park. More aligned with the Government's commitment to landscape recovery, reducing habitat fragmentation and engaging people with nature. Urban edge is a clear boundary. 	<p>the same year, it is likely that this was the reason the land was excluded from the boundary.</p> <p>The issues associated with this land, which are pertinent to a judgment to include or exclude the land, revolve around the following:</p> <ul style="list-style-type: none"> Planning history and its exclusion from the AONB due to proposals for residential development. The extent to which the site forms part of a sweep of land up to the urban edge. The extent to which the current land use impacts condition and quality. <p>Natural England acknowledges that decisions of this nature are finely balanced. However, the nature of the equestrian land use is considered to have a detrimental effect on the character and qualities of the area, and to impart a more 'urban fringe' character. This, coupled with the slope and vegetation and association with the built-up edge of Bookham, has led to Natural England's decision to continue to exclude the area. Although the site abuts the AONB landscape on two sides it is not surrounded by qualifying land and also occurs at the edge. Its inclusion is not necessary in order to bring in a wider area of qualifying land. Natural England therefore does not consider this is an appropriate use of wash-over.</p> <p><u>Conclusion</u></p> <p>No change.</p>

Oxted		
Area	Representations	Natural England Commentary
Land North of Park Road	<p>ANON-VUXE-WEZX-P, ANON-VUXE-WES4-B and ANON-VUXE-WE78-K (Tandridge District Council) support the proposal for a minor boundary refinement for “Land North of Park Road” in Oxted.</p>	<p>Commentary</p> <p>Natural England notes the support for the proposed boundary.</p>
Land at Chichele Road	<p>ANON-VUXE-WSQF-9 (Tandridge District Council) agrees with the proposed boundary refinement for this area.</p> <p>ANON-VUXE-WEZX-P disagrees that land at Chichele Road should be included in the AONB. Reasons given include:</p> <ul style="list-style-type: none"> • The site is not subject to any landscape quality designations (outside of AGLV and AONB) and has consistently been judged to be outside of these areas. • Site is seen in the context of the settlement of Oxted. • Site does not have sufficient natural beauty to be designated as AONB. • Views of the existing AONB from the site are restricted by woodland. • The existing AONB boundary follows a clear line on the ground and is not a boundary anomaly. 	<p>Commentary</p> <p>Natural England notes the support for the proposed boundary.</p> <p>The land off Chichele Road did not form part of EA10 and was assessed as a minor boundary refinement following evidence submitted as part of the ‘Call for Evidence’ which included information on the positive qualities of the land. It is referred to in The Boundary Considerations Report as part of land north of Park Road. The Boundary Considerations Report states <i>‘To the west, there is a further irregular field which is contained by mature hedges and woodland shaws. Although close to the urban area, this latter area retains a strongly rural character. An alternative boundary can be defined along the vegetated edge at the rear of properties on Park Road and hedgerows/woodland to the southwest.’</i></p> <p>Natural England agrees that this land lies beyond the Area of Great Landscape Value (AGLV) boundary.</p> <p>The ability to see a site in the context of a settlement is not a reason for the site to be excluded from the AONB. There are many examples where the AONB extends up to and abuts the urban edge, e.g. immediately to the north.</p> <p>The Boundary Report is clear that minor boundary anomalies have been reviewed where <i>‘the existing AONB does not follow a clear feature on the ground, where the land in question relates strongly to the wider AONB forming part of a</i></p>

Oxted		
Area	Representations	Natural England Commentary
	<ul style="list-style-type: none"> Suggestion that evidence provided from the 'call for evidence' was submitted to protect the site from specific development proposals. CALA is pursuing a planning application for residential development on this site. Site is one of very few suitable opportunities to deliver new homes in Tandridge District which has less than 2 years' housing land supply. 	<p><i>sweep of qualifying land, and where a suitable alternative boundary can be defined'</i> (page 45). In this instance, the issue revolves around the second of these.</p> <p>Natural England notes that respondent ANON-VUXE-WEZX-P has concerns that the evidence provided during the 'Call for Evidence' was motivated by a desire to protect the site from development. Natural England does not consider the motives of respondents but considers evidence on its merits in relation to the Natural Beauty Criterion.</p> <p>Natural England has undertaken an assessment of the natural beauty of the site. This approach reflects the Natural England Guidance which stresses that the Natural Beauty Criterion should not be applied on a field-by-field basis (para 5.3). The analysis provided by respondent ANON-VUXE-WEZX-P does not consider the land in context of the wider landscape of which it is a part.</p> <p>Natural England agrees that the land currently comprises a pastoral field and has been ploughed in the past. Natural England notes that the topography of the land is gently undulating and has visual connections to the wider AONB landscape forming part of a wider sweep of qualifying land. Historic Landscape Characterisation classifies the land (and the two fields to the north) as large irregular assarts with wavey or mixed boundaries. The ancient woodland, which flanks the northern and western boundaries, is split by the existing AONB and makes an important contribution to the character and qualities of the area. Natural England acknowledges that the metal fencing delineating the playing fields of Oxted School (to the south) has a more urbanising influence, however, it also notes that the presence of the playing fields means built development is set back and at a lower elevation, such that it recedes and does not significantly undermine the condition or integrity of the area.</p>

Oxted		
Area	Representations	Natural England Commentary
	<p>ANON-PQ5Q-KR4B-T</p> <p><i>'The site has long been promoted for much needed residential development and is currently pending a planning application decision. For the reasons contained in the original representations, we assert that the site fails to justify inclusion as a Minor Boundary Refinement and should, therefore, be removed as such.'</i></p>	<p>Natural England Guidance makes it clear that decisions on a boundary need to be made consistently along its length (para 9.3). Given that the AONB boundary extends up to the urban edge to the north and includes similar assarted fields, and that land north of Park Road is also proposed for inclusion, Natural England is of the view that the inclusion of this land, given its similar qualities and characteristics, is justified. Natural England considers this is a consistent approach to the boundary in this context.</p> <p>The land is not currently allocated within the local development plan, nor is there any planning permission associated with the land. Natural England is aware that the land is being promoted for development and that pre-application discussions have taken place.</p> <p>Should the planning circumstance of the site change prior to the Designation Order being submitted to the Secretary of State, the decision to include this land within the AONB should be reviewed.</p> <p><u>Conclusion</u> No change.</p> <p><u>Commentary</u></p> <p>Natural England set out above the reasons why this landscape is considered to meet the Natural Beauty Criterion. Judgements have been based on a range of different documentary evidence as well as site assessment where the site is visible from surrounding areas.</p> <p>Planning application 2023/1345 for residential development was submitted to Tandridge District Council and refused in February 2024. It was then appealed. The inspector dismissed the appeal in December 2024.</p>

Oxted		
<u>Area</u>	<u>Representations</u>	<u>Natural England Commentary</u>
		<p>Natural England therefore considers the proposed boundary to be robust.</p> <p><u>Conclusion</u></p> <p>No change.</p>

Dorking		
<u>Area</u>	<u>Representations</u>	<u>Natural England Commentary</u>
Clay Copse and Milton Heath	<p>ANON-VUXE-WM49-S</p> <p><i>'I write to support the change to the boundaries in north-west Dorking (consultation Fig 25). In particular the inclusion of Milton Heath seems a most natural extension.'</i></p>	<p><u>Commentary</u></p> <p>Natural England notes the support for the proposed boundary.</p>
Land South of A25 at Sondes Place Farm	<p>ANON-VUXE-W5YQ-X and ANON-VUXE-WMF5-7 requested inclusion of this area stating: 'I can find no reference to this area in any of the documents you have published for scrutiny.'</p> <p>Reasons for including this land:</p>	<p><u>Commentary</u></p> <p>This land did not form part of the initial Study Area put forward by Natural England and was therefore not included within an Evaluation Area.</p> <p>Evidence was submitted during the 'Call for Evidence' regarding this land as well as land north of the A25. Land to the north of the A25 was referred to as Land Northwest of Dorking and formed an area contiguous with the existing AONB boundary. Land at Sondes Place Farm was found to comprise two arable fields</p>

Dorking		
<u>Area</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<ul style="list-style-type: none"> • Integral part of the views from a viewpoint to the north of the site (Steers Field). • Agricultural land. • Highly visible in wider views. • Development along A25 does not impinge on wider views. • Clear boundary on the ground • Impact of potential future housing on area. 	<p>sandwiched between the urban edge, school playing fields and the A25 and development to the north. As a result, this latter area was considered to be isolated and not considered further. For this reason, there is no specific reference to this land in the Technical Reports.</p> <p>Land at Sondes Place Farm was subject to a planning application in the summer of 2023, followed by a planning appeal. The appeal was allowed in Nov 2023. This land therefore has planning permission for housing and, in accordance with Natural England Guidance, should be excluded from the Surrey Hills AONB revised boundary.</p> <p><u>Conclusion</u> No change.</p>
Land Northwest of Dorking	<p>ANON-VUXE-WEZ7-N (Mole Valley District Council), ANON-VUXE-WSQK-E and ANON-VUXE-WM9G-C requested inclusion of this area. Reasons include:</p> <ul style="list-style-type: none"> • Highly scenic undulating landscape. • Assessment is not adequately detailed. • Urban edge does have a negative impact but localised e.g. development along Curtis Road. • Land is contiguous with the wider landscape despite the railway. • Woodland contributes to the quality of the area. • Striking views into the AONB and Dorking. • Church landmark contributes to views. 	<p><u>Commentary</u></p> <p>This area was considered as part of the Minor Boundary Refinements and is referred to as Land Northwest of Dorking (page 70) in the Boundary Considerations Report.</p> <p>Natural England has reviewed this area in light of evidence received by respondents. The Boundary Considerations Report set out on page 70 that this area was affected by ancillary development associated with the commercial use of former mansion houses and grounds and the proximity to Curtis Road Industrial Estate.</p> <p>Natural England also reviewed this area in light of other minor alterations to the boundary west of Reigate, in order to ensure consistency of approach.</p>

Dorking		
Area	Representations	Natural England Commentary
	<ul style="list-style-type: none"> Previously included suitable for designation by Hankinson Ducketts Associates (HDA). <p>Desirability:</p> <ul style="list-style-type: none"> Frames the wider countryside and settlement Setting to Dorking. No sure safeguard for land outside of the AONB. Contributes to view into and out of the AONB. <p>Boundary: Two boundary options are put forward:</p> <p>Firstly, a boundary which runs to the north of Milton Court along Pip Brook and then along field boundaries to the south side of Milton Court Lane and then north along a farm track to the railway.</p> <p>Secondly, a boundary which is as above but extends further east to the built edge.</p>	<p>When making decisions about the location of boundaries between existing urban areas and the existing AONB boundary, decisions can often be finely balanced. In locations close to the chalk scarp, the scale and drama of the rising topography can lift scenic qualities and conversely urban fringe influences can fragment and undermine condition.</p> <p>Given that a decision was reached to include land west of Reigate at the footslopes of the chalk scarp, even where there is some isolated development, Natural England has decided to review this landscape east of Dorking to ensure consistency in our approach. Here the landscape, like land west of Reigate, forms a sweep of land from the chalk scarp. In addition, it dips into a shallow basin associated with Pipp Brook before rising again towards Milton Court Lane and Milton Court. Here the former mansion house of Milton Court affords views across the landscape to the dramatic scarp slopes. Although land up to the urban edge, comprises large regular fields with straight boundaries, around Milton Court, the fields comprise regular assarts with wide hedgerows and former parkland landscape. Much of this area has a moderate degree of tranquillity and rurality, despite its proximity to Dorking and traffic associated with employment sites. Within this context, the railway is not a strong visual feature and does not detract from scenic qualities.</p> <p>Although the buildings associated with Milton Court are used for commercial purposes, they are nonetheless Grade II* and their scale and position in the landscape - located on rising land and surrounding by parkland, with the chalk scarp backdrop, means that they have a strong sense of place and contribute to the scenic quality of the area. On balance, the commercialisation and signage is subservient to the drama of the scarp backdrop. Similarly, views across the land to the east towards the church spire of Dorking enhance scenic qualities and compositions, while the narrow-walled lane of Milton Court Lane has a secretive quality at its western end, opening out to offer wider views northwards. However,</p>

Dorking		
Area	Representations	Natural England Commentary
		<p>further east the landscape is increasingly influenced by the proximity of the urban edge where it becomes more visually dominant – especially large-scale industrial units. Natural England has reviewed the extent to which the tree and shrubbery belt, associated with the Curtis Road Industrial Estate, will mitigate these effects in future.</p> <p>Having reviewed all the evidence, Natural England has concluded on balance that part of this area warrants inclusion within the Surrey Hills Area of Outstanding Natural Beauty. In defining an appropriate boundary consideration has been given to declining condition and quality towards the urban edge and the exclusion of development allocation Policy SDS26.</p> <p>Natural England has therefore identified clear features for the boundary to follow which include mature hedgerows and Milton Court Lane. This enables the boundary to be pulled back from the urban edge and drawn within the transitional landscape, preventing an overly complex boundary and/or inclusion of lesser quality land, whilst still including a more extensive area at the foot of the scarp.</p> <p>Conclusion Minor addition to include land northwest of Dorking.</p> <p>(Addition 25 – refer to Fig 25a)</p>
Support for proposed Addition 25: Land west of Dorking	<p>58 respondents agreed with Addition 25, and only some provided a reason for their view as follows:</p> <p>ANON-PQ5Q-KRRC-S (Mole Valley District Council)</p> <p><i>‘Yes, the Council agrees that this should be designated as part of the Surrey Hills National Landscape [AONB].</i></p>	<p>Commentary</p> <p>Natural England acknowledges the reasons given by respondents in support for this addition.</p>

Dorking		
Area	Representations	Natural England Commentary
	<p><i>It notes that the full extent of the Council's suggested amendment submitted at the initial consultation has been accepted, as well as other refinements within the area that have been deemed suitable for inclusion by Natural England. It is considered that the methodology applied has been done correctly and is consistent with the assessment of other areas. The Council welcomes the addition of the Land west of Dorking as shown on Map 25b, reference A25."</i></p> <p>ANON-PQ5Q-KRT6-E</p> <p><i>'Thank you very much for giving us the opportunity to respond to a second [2024] consultation on the boundary review. We attended a useful online briefing session on 18 September and have also reviewed the latest documents. We are pleased to note that the suggestions we made in June 2023 alongside others have been largely reflected in a revised proposed boundary and we therefore have no further comments to make.'</i></p> <p>ANON-PQ5Q-KRT3-B</p> <p><i>'[Anon] welcomed the proposed extensions of the AONB. The further additions now under consultation are also welcomed. In particular it is noted that a number of parks and gardens of interest as non-designated heritage</i></p>	<p>2 respondents disagreed with the designation of Addition 25 but provided no reason for their view.</p> <p><u>Conclusion</u> No change.</p>

Dorking		
Area	Representations	Natural England Commentary
	<i>assets are affected. These include..... Milton Court near Dorking....'</i>	
Support Addition but wish to comment on the boundary	<p>Although 2 respondents wished to comment on the boundary, only one provided a comment as follows:</p> <p>ANON-PQ5Q-KR3D-U</p> <p><i>'I am surprised that the area encompassing the Tumulus on the other side of the A25 is not included. See this image below – the Open Access area I have highlighted in green.</i></p> <p><i>This land is owned by Mole Valley District Council and is effectively part of Milton Heath, it is simply divorced from it by the A25, so I rather assume its omission is more of an oversight than anything else.'</i></p>	<p><u>Commentary</u></p> <p>The tumulus west of the A25 was taken into account during the Natural Beauty Assessment and boundary work.</p> <p>Natural England Guidance on boundary setting notes that features of interest on the margins of an AONB should be included where practicable, providing they are situated within a tract that meets the statutory criterion.</p> <p>Natural England agrees that the Tumulus is divorced from wider qualifying areas as a result of the A25. Natural England also notes that it does not sit within a wider area of qualifying land. On this basis, Natural England maintains the view that the current proposed boundary along the A25 is appropriate.</p> <p><u>Conclusion</u></p> <p>No change.</p>

Haslemere		
Area	Representations	Natural England Commentary
General Support for Changes around Haslemere	<p>ANON-VUXE-WMYB-7 <i>'I support all the proposed extensions within Haslemere which make perfect sense'.</i></p> <p>ANON-VUXE-WEBK-H <i>'We support inclusion of this area in the AONB boundary – Land East of Sturt Road, Land North East of Woolmer Hill, Land West of Farnham Lane, Land South of Grayswood Common, Woodland along railway, Land at Tyndalls Wood'.</i></p>	<p>Commentary</p> <p>Natural England notes the support for the proposed boundary.</p>
General objection to changes around Haslemere	<p>ANON-VUXE-WE5X-H <i>'There is no need for yet more areas to be designated in the proposed way. There is plenty of AONB and the further designation simply strangles the ability to change as needs must. There is no need for yet more heavy and bureaucratic administration of largely private land by an unelected organisation'.</i></p> <p><i>'To counter the decisions of Natural England requires appeal to the Secretary of State which is quite beyond most citizens'.</i></p> <p>Concern expressed especially for proposed inclusion of:</p> <ul style="list-style-type: none"> Land South of Scotland Lane 	<p>Commentary</p> <p>Natural England has considered minor boundary anomalies on the fringes of Haslemere where the current AONB does not follow clear features on the ground and or where the land between the AONB boundary and the urban edge is part of a wider sweep of qualifying land.</p> <p>Natural England disagrees that designation of land as AONB creates more heavy and bureaucratic administration and this is addressed in Appendix 2.</p> <p>The three areas of particular concern are discussed in more detail below.</p>

Haslemere		
Area	Representations	Natural England Commentary
	<ul style="list-style-type: none"> Land at Sturt Farm Land between Bunch Lane and Weydown Road. 	
Land South of Scotland Lane	<p>ANON-VUXE-WSK5-J and ANON-VUXE-WEBK-H requested the inclusion of land south of Scotland Lane which is not the subject of a planning permission. Reasons include:</p> <ul style="list-style-type: none"> Land not subject to a planning permission Prominent position within the surrounding landscape Wildlife corridors along Scotland Lane and Tennyson Lane. <p>ANON-VUXE-WE5X-H considers that land south of Scotland Lane is not required to support the existing AONB and would be detrimental to its use for very badly needed housing.</p>	<p>Commentary</p> <p>This area was considered as part of the Minor Boundary Refinements and is referred to as Land South of Scotland Lane (page 71) in the Boundary Report. This noted that the site was subject to an extant planning permission and no change to the AONB boundary was proposed.</p> <p>Natural England has reviewed this area in light of evidence received by respondents.</p> <p>Natural England acknowledges that the land between Scotland Lane and Red Court is the subject of an approved planning application but land to the east of Red Court is not. Natural England also notes that the current AONB boundary does not follow clear features on the ground and that it splits an area of ancient woodland. Natural England has considered if an alternative boundary exists which enables this area of prominent rising land on the margins of the AONB to be included. Natural England has concluded that a clearer boundary could be defined which follows the northern edge of the ancient woodland, property boundaries and northern edge of woodland adjacent to Scotland Road, as well as the access driveway to Red Court. This would enable the open slopes and continuation of the bridleway, up to the start of built development, to be included.</p> <p>This boundary addresses the fact that the current AONB as defined in the Designation Order Map and Waverley Local Plan does not follow features on the ground through this area.</p>

Haslemere		
Area	Representations	Natural England Commentary
		<p>Conclusion Minor addition to ensure AONB follows clear features on the ground and includes prominent open land, ancient woodland and bridleway.</p> <p>(Addition 26: Refer to Fig 28a)</p>
<p>Support for proposed Addition 26: Land at Red Court</p>	<p>53 respondents agreed with the designation of Addition 26, although only some provided a reason for their view as follows:</p> <p>ANON-PQ5Q-KR3Y-G (Waverley Borough Council)</p> <p><i>‘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.</i></p> <p><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>Commentary</p> <p>Natural England acknowledges the reasons given by respondents in support for this addition.</p> <p>Natural England justification for including land has not been on the basis of planning pressure. Natural England Guidance is clear that land should not be included merely to seek to protect it from specific development proposals.</p> <p>Conclusion No change.</p>

Haslemere		
Area	Representations	Natural England Commentary
	<p>ANON-PQ5Q-KRB9-Y</p> <p><i>'Developers wanting to destroy landscape. Might add more weight to refusal.'</i></p>	
Object to proposed Addition and wish to comment on the boundary	<p>1 respondent indicated they wished to comment on the boundary but provided no comment, while 5 respondents disagreed with this proposed Addition, but only 2 provided a reason and suggested an alternative boundary as follows:</p> <p>ANON-PQ5Q-KR3M-4 and ANON-PQ5Q-KRTS-B</p> <p><i>'...the whole Site has obtained planning permission on 14 February 2024 for allotments (ref: WA/2023/00029). The situation on this Site is therefore, going to change on this Site significantly. Whilst the development of allotments within the AONB is not strictly prohibited, it seems illogical to include this land within the AONB when it will be developed with a Green Infrastructure use, which will include an access road, car parking, tools/equipment sheds, waste and water storage facilities and general allotment paraphernalia. When the Site was first assessed it was an open field without planning permission. It is noteworthy that the nearby Collards Lane, east Haslemere allotments abut the existing AONB boundary but are not proposed for inclusion in the Surrey Hills AONB review</i></p>	<p><u>Commentary</u></p> <p>Natural England was not aware of the planning permission for allotments on land at Red Court which was approved by Waverley Borough Council on 14 February 2024.</p> <p>Natural England has reviewed the planning application (WA/2023/00029) which is for a change of use for community allotments and orchards, with access off Scotland Lane, car and cycle parking spaces and associated landscaping.</p> <p>Natural England Guidance (Appendix 4) states that land on the margins of an AONB having the benefit of planning permission for major built development, should normally be excluded from the AONB. In this case the proposed development does not constitute major development.</p> <p>Allotments are included in National Landscapes (AONB's) where they form part of qualifying land, taking boundary considerations into account e.g. Clammer Hill allotments in Haslemere which forms part of wider qualifying land. In the case of Collards Lane allotments (excluded from the AONB), it is likely the use of the lane as the boundary was a determining factor.</p> <p>In the case of the allotments off Scotland Lane, the land slopes away from the urban edge and forms part of a wider sweep of landscape to the south.</p>

Haslemere		
Area	Representations	Natural England Commentary
	<p><i>[Anon] has advance planted a tree buffer along the southern boundary of their field, which will provide a natural boundary to the landscape below</i></p> <p><i>It is therefore logical for A26 not to be included within the proposed extension of the AONB.'</i></p>	<p>Furthermore, Addition 26 comprises more land than the allotment site, including a small area of woodland pasture fields adjacent to the existing AONB. Thus, even if the allotments were not included, there would remain a need for a minor addition in this location.</p> <p>Given the site will remain open rather than built, Natural England has concluded it is preferable to maintain the boundary along Scotland Road and to include the allotments within the proposed addition.</p> <p>Conclusion No change.</p>
Land at Sturt Farm	<p>ANON-VUXE-WEBK-H requested that this area be reconsidered for inclusion within the AONB. Reasons include:</p> <ul style="list-style-type: none"> • Approved planning application WA/2016/2144 and subject to current planning application WA/2022/00281 relate to other sites close by and not the area identified. • Treelined ridge. • Areas of woodland, grassland and mature hedges. • Ecological network. <p>ANON-VUXE-W5NR-M and ANON-VUXE-WMEA-J raised concerns regarding the existing AONB boundary shown on the Statutory Consultation Boundary Map Fig 28 and the AONB boundary as plotted on the Waverley Borough Adopted Local Plan Policies Map 2018.</p>	<p>Commentary</p> <p>This area was considered as part of the Minor Boundary Refinements and is referred to as Land at Sturt Farm (page 71) in the Boundary Considerations Report.</p> <p>Natural England has reviewed this area in light of evidence received by respondents.</p> <p>Natural England notes that this area is the subject of planning applications and permission (some of which are being built out). In particular, Natural England understands that the current planning position is as follows:</p> <ul style="list-style-type: none"> • Planning application WA/2016/2144 was withdrawn in 2017. • Planning application WA/2022/00281 was refused planning permission. • Planning application WA/2023/00589 was approved in July 2023 for five dwellings on the southwestern edge of consented application WA/2018/0275 (which is being built out).

Haslemere		
Area	Representations	Natural England Commentary
	Furthermore, it includes land allocated for development. An amendment to the Natural England proposed boundary is requested accordingly.	<p>In accordance with Natural England Guidance (Appendix 4) land with planning permission should normally be excluded.</p> <p>Natural England has reviewed the existing AONB boundary as depicted in the Waverley Borough Local Plan and Natural England boundary map Figure 28, alongside the Designation Order Map, which is the legal boundary to the existing AONB. Natural England agrees that there is a discrepancy in how the existing AONB boundary is mapped. The legal boundary of the existing AONB is that depicted in the Designation Order Map. Discrepancies may arise as a result of the interpretation of the 1958 Designation Order Map and the mapping of the existing boundary at differing scales. Natural England will be undertaking a detailed review of the existing AONB digitised boundary at both 1:25,000 scale and 1:2500 scale, prior to the finalisation of maps for the Notice Period, to ensure that any proposed Extension Area boundary departs from, and joins to, the current AONB in the correct location. Further information relating to mapping is set out in Appendix 1.</p> <p>In relation to the housing site, which is currently being built, Natural England acknowledges that, having consulted the Designation Order Map, this housing site lies within the current AONB boundary. The current AONB boundary review does not seek to de-designate land. Further information in response to the specific issue of de-designating land is given in Appendix 1. On this basis Natural England does not agree that the boundary should be amended in this location.</p> <p><u>Conclusion</u> No change.</p>

Haslemere		
Area	Representations	Natural England Commentary
Land between Bunch Lane and Weydown Road	<p>ANON-VUXE-WEBK-H requested the boundary in this area be reconsidered. Reasons include:</p> <ul style="list-style-type: none"> • Difficult to follow property boundaries in this instance as the whole area has various private owners. • We propose using the WSK5-J (Haslemere South Residents Association) boundary. • Area of Strategic Visual Importance (ASVI) boundary (subsequently used to determine settlement boundaries for the Neighbourhood Plan) so all boundaries are congruent and include the Ancient Woodland designators. 	<p><u>Commentary</u></p> <p>This area was considered as part of the Minor Boundary Refinements and is referred to as Land between Bunch Lane and Weydown Road (page 72) in the Boundary Report.</p> <p>Natural England has reviewed this area in light of evidence received by respondents.</p> <p>Natural England has given consideration to the use of the Area of Strategic Visual Importance as defined in the Local Plan and reviewed the Areas of Strategic Visual Importance Topic Paper (Nov 2020). This document sets out the purpose of this designation as: <i>‘to protect areas of land which are important because of the role they play in establishing the character of a locality and preventing coalescence of developed areas.’</i></p> <p>The Land between Bunch Lane and Weydown Road was considered to be an Area of Strategic Visual Importance (ASVI) following review, and various amendments were made to the boundary as set out in the Nov 2020 report (pages 23 and 24). These changes were incorporated into the Waverley Borough Local Plan Part 2 (March 2023) map 28. The ASVI boundary has been checked against the settlement boundary and found to be congruent. Natural England has also checked the proposed AONB boundary and identified a number of minor errors between it and the settlement boundary. In correcting these errors, which occur to the south and west, Natural England confirms that the proposed AONB boundary should follow that of the settlement boundary and ASVI.</p> <p><u>Conclusion</u> Minor deletion at Weydown Road Car Park.</p>

Haslemere		
Area	Representations	Natural England Commentary
		<p>Minor additions along Bunch Road to ensure boundary follows settlement boundary and Area of Strategic Visual Impact, which are the same.</p> <p>(Deletion 13 – Refer to Fig 28a) (Addition 27 – Refer to Fig 28a)</p>
<p>Support for proposed Addition 27: Land west of Bunch Road</p>	<p>52 respondents agreed with the designation of Addition 27, and some provided a reason for their view as follows:</p> <p>ANON-PQ5Q-KR3Y-G (Waverley Borough Council)</p> <p><i>‘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.</i></p> <p><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><u>Commentary</u></p> <p>Natural England acknowledge the reasons given by respondents in support for this addition.</p> <p>2 respondents disagreed with the designation of Addition 27 but provided no reason for their view.</p> <p>No respondents wished to comment on the boundary. Natural England notes therefore, that there are no responses specifying a change to the boundary in this area.</p> <p><u>Conclusion</u> No change.</p>

Haslemere		
Area	Representations	Natural England Commentary
Support for the proposed Deletion 13	<p>Of the 33 responses received for this area, 23 supported the proposed deletion with only one providing a reason for their view as follows:</p> <p>ANON-PQ5Q-KR3Y-G (Waverley Borough Council)</p> <p><i>'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</i></p> <p><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><u>Commentary</u></p> <p>Natural England acknowledges the support for this deletion.</p>
Object to proposed Deletion 13 and wish to comment on the boundary to include	<p>Of the 33 responses received for this area, 1 respondent provided a reason for their view, objecting to the deletion.</p> <p>ANON-PQ5Q-KRH7-3</p>	<p><u>Commentary</u></p> <p>Natural England remains of the view that the proposed boundary should align with the settlement boundary and ASVI in this location, as set out in Appendix 21 page 30-31 above.</p>

Haslemere		
Area	Representations	Natural England Commentary
more land	<i>'Important tree cover visible and accessible too [to] the public in middle of town'</i>	<u>Conclusion</u> No change.
Land at Lower Hanger Wood	<p>ANON-VUXE-WEBK-H requested the boundary in this area be reconsidered. Reasons include:</p> <ul style="list-style-type: none"> Owned and managed by Waverley Borough Council (WBC). Public recreational space. Area of Greater Landscape Value (AGLV). Ancient woodland. Access to woodlands from urban area. Wooded backdrop to the AONB. Boundary does follow feature on the ground but including the WBC woodland would utilise curtilage and property boundaries. 	<p><u>Commentary</u></p> <p>This area was considered as part of the Minor Boundary Refinements and is referred to as Land at Woolmer Hill (page 74) in the Boundary Report.</p> <p>Natural England has reviewed this area in light of evidence received by respondents.</p> <p>Natural England agrees that this area contains ancient woodland which is located on steep slopes and that these areas run into the urban area. Minor boundary variations are made where the existing AONB boundary does not follow a clear feature on the ground or where there is no clear rationale for the boundary. In this instance, and as set out in the Boundary Report, Natural England is of the view that there is no real justification for extending the boundary in this location. Furthermore, the area is already managed by Waverley Borough Council and comprises land uses which relate more closely to the urban area.</p> <p><u>Conclusion</u> No change.</p>

Beacon Hill and Hindhead (formerly referred to as Grayshott)		
Area	Representations	Natural England Commentary
General comment	ANON-VUXE-WEBK-H The areas considered lie adjacent to Beacon Hill and Hindhead, not Grayshott which is in Hampshire	<p><u>Commentary</u></p> <p>Natural England notes that the areas considered are adjacent to Beacon Hill and Hindhead and will make the relevant changes to the naming of these areas in the final technical documents which are submitted as part of the Designation Order to the Secretary of State.</p> <p><u>Conclusion</u> No change.</p>
Land north of Linkside North and Eight Acres	ANON-VUXE-WEBK-H <i>'There is an anomaly where the AONB boundary is difficult to follow on the ground. Redefine boundary along property boundaries'.</i>	<p><u>Commentary</u></p> <p>This area lies to the southwest of the proposed boundary change at and north of Linkside North of Eight Acres (page 76 in the Boundary Considerations Report) and has not previously been considered in the boundary review.</p> <p>Natural England has reviewed this area in light of evidence received by respondents. Natural England acknowledges that the boundary in this location does not follow a clear feature on the ground. The land proposed for inclusion in the AONB forms part of the Hindhead Golf Course and is a small parcel of land surrounded by development on three sides. Here, the AONB follows the settlement boundary and cuts across in a straight line between two areas of development. Just to the south of this area, development associated with Hindhead Golf Club is also excluded.</p> <p>Given the small scale of the parcel of land, the influence of the adjacent urban area and the exclusion of development associated with the golf course to the south, Natural England considers that there is no strong justification for altering the current AONB boundary.</p>

Beacon Hill and Hindhead (formerly referred to as Grayshott)		
<u>Area</u>	<u>Representations</u>	<u>Natural England Commentary</u>
		<u>Conclusion</u> No change.

Other New Areas		
<u>Area</u>	<u>Representations</u>	<u>Natural England Commentary</u>
Redhill Common	<p>ANON-VUXE-WEQW-C requested this area for inclusion in the AONB.</p> <p>No reasons were given.</p>	<u>Commentary</u> <p>Redhill Common was not previously considered as part of the boundary review as it forms an area of isolated land surrounded by the built-up area of Redhill and Reigate.</p> <p>Natural England does not consider this area meets the Natural Beauty Criterion and is separated from the wider AONB by urban development.</p> <u>Conclusion</u> No change.