

## Appendix 3: Wey Valley Farnham

Please refer to Figure 13b

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

### Overview

Question C1: Does the Wey Valley, Farnham Extension Area have Sufficient Natural Beauty to be designated as AONB?

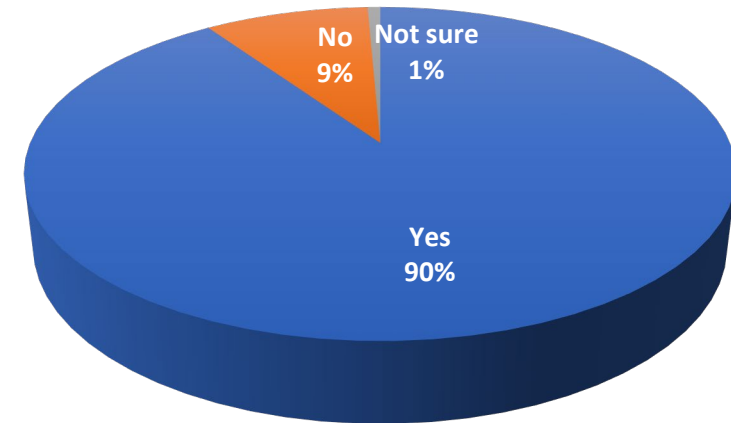
Natural Beauty	Responses
Yes	132
No	13
Not sure	1

Of the 146 respondents who answered question C1, 132 respondents (90%) felt that the Wey Valley, Farnham Extension Area has sufficient natural beauty to be designated as AONB.

In contrast, 13 respondents (9%) felt that the Wey Valley, Farnham Extension Area does not have sufficient Natural Beauty to be designated as AONB.

In terms of desirability, respondents advance arguments in support, mainly relating to the need for greater planning control over development and opportunities to address biodiversity loss. Other respondents advance arguments against tighter planning restriction, increased house prices and that the area is already protected. These issues are addressed in Appendix 2.

Wey Valley, Farnham - Sufficient natural beauty to be designated



**Question C5: Do you agree with the proposed boundary for the Wey Valley, Farnham Extension Area?**

Boundary	Responses
Yes	121
Yes, but I wish to suggest an alternative	9
No	7
Not sure	2

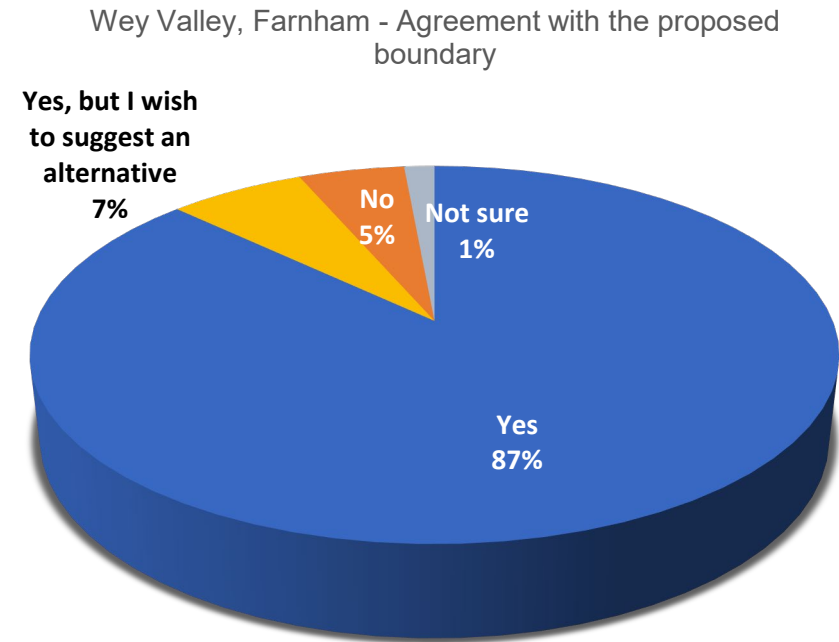
Of the 139 respondents who answered Question C5, 121 respondents (87%) agreed with the proposed boundary for the Wey Valley, Farnham, and 9 respondents (5%) did not. 9 respondents (7%) agreed but wished to suggest an alternative boundary and many provided supporting evidence.

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

- Runfold Ridge Suitable Alternative Natural Greenspace (SANG)
- Land south of A31
- Valley floor north of railway
- Stoneyfields
- Tice's Meadow
- Farnham Old Park

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

- Compton and Moor Park
- Flatter developed areas
- Private garden at Brocks Dene



During the second (2024) statutory consultation, responses were received regarding **Deletion 1: Land off Waverley Lane** and **Deletion 2: Land at Rock House**. Natural England has reviewed these areas and provided further commentary in blue below.

Further responses were also received relating to **Tongham SANG, land between Wey Valley and Runfold Ridge, and land north of the railway line**. Natural England has reviewed these areas and provided further commentary in blue below.

Natural Beauty		
Theme	Representations	Natural England Commentary
Area meets the Natural Beauty Criterion	<p>A significant number of respondents set out their support for the proposed Extension Area providing confirmation of the area's outstanding natural beauty. Examples include:</p> <p><b>ANON-VUXE-WS1W-T (Waverley Borough Council)</b>  <i>'Waverley also broadly supports the specific areas within Waverley proposed for inclusion in the AONB. The Council agrees with the accompanying assessment that the quality of the proposed areas is of sufficient natural beauty to be included in the AONB.'</i></p> <p><b>ANON-VUXE-W5RY-Y</b>  <i>'The Wey Valley combines open floodplain with wooded slopes, running into rare wet woodland/carr. It provides an attractive link up around south-east Farnham, helping to maintain the rural character of the town, and providing some really attractive views of wildlife. It also encompasses part of the North Downs Way, with open views northward [northward].'</i></p> <p><b>ANON-VUXE-W5AQ-6</b>  <i>'The land around the valley of the river [River] Wey and its tributary the Bourne Stream form a cohesive designation, with wooded slopes framing the area. These wooded slopes and fields contain and are bordered by mature trees and Ancient Woodland, including some Veteran Trees, with ancient hedgerow on each side of Waverley Lane. Historically, the land from the edge of the built-up area is linked to Waverley Abbey – with Waverley Lane marking the ancient route for the monks from the town to the abbey. The maturity of the green cover, together with such features as the gully of Waverley Lane as it descends to the stream, are both characteristic of other areas within the Surrey Hills AONB.'</i></p>	<p><b>Commentary</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 Report.</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><b>ANON-VUXE-WE2Q-7</b>  <i>'As a long-term resident of Waverley Lane, Farnham from 1961 to 2016, I can strongly testify to the unexpected and extraordinary tranquillity, intactness and beauty of the meadows and woodlands of this small part of the Wey Valley, despite the closeness of major roads and development. The area is incomparable as a refuge and resource for local people.'</i></p> <p><i>'The bat habitat of Mother Ludlam's Cave is a compelling argument for preservation.'</i></p> <p><i>'The important cultural heritage of Moor Park, the GHQ line [GHQ Line Pillboxes] and Waverley Abbey are compelling reasons to preserve the area.'</i></p> <p><b>ANON-VUXE-W54U-W</b>  <i>'This area provides a haven for wildlife. The trees contribute to the carbon offset from all the cars that travel to south Farnham school and down to the level crossing which negatively impacts air quality. And it is beautiful.'</i></p> <p><b>ANON-VUXE-W544-V</b>  <i>'It is a very intact beautiful rural environment with incredible wildlife. This area should be given extra protection from development due to its unique features including wildlife, traditional meadows, rare wetland habitats, historic buildings and features such as Moor Park House, High Mill, Mother Ludlam's cave and WW2 pill boxes etc.'</i></p> <p><b>ANON-VUXE-W5PY-W</b>  <i>'It is a beautiful area with lots of wildlife and walking trails.'</i></p> <p><b>ANON-VUXE-W5PZ-X</b></p>	

Natural Beauty		
Theme	Representations	Natural England Commentary
	<p><i>'The area has scenic landscape quality with historic landmarks and ancient woodlands with relative wildness away from local housing and busy roads. It provides peace and tranquillity for both humans and natural habitats.'</i></p> <p><b>ANON-VUXE-W587-3</b>  <i>'This valley is magical. It is like it should be in a painting by a great master as quintessentially English countryside. Spring is so beautiful with the blossom on the trees.'</i></p> <p><b>ANON-VUXE-W5E2-B</b>  <i>'I believe that this area is an area of great beauty and should be considered for categorisation as an area of outstanding natural beauty. '</i></p> <p><b>ANON-VUXE-W5KY-R</b>  <i>'I am in complete agreement with the assessment that the proposed extension area is closely related to the existing Surrey Hill AONB, that is forms largely contiguous land which shares the same geology as the wider AONB, comprising of the greensand hills and rolling valleys. This extension area absolutely reflects the qualities found elsewhere within the AONB and thus is truly representative of the existing designated landscape.'</i></p> <p><b>ANON-VUXE-W5V1-U</b>  <i>'It is beautiful and tranquil, taking into account the river, the river valley and surrounding hills/fields. It also incorporates Waverley Abbey. The area is a seamless continuation of the areas that are already designated AONB, and it is artificial not to include it.'</i></p> <p><b>ANON-VUXE-W5MT-N</b></p>	

Natural Beauty		
Theme	Representations	Natural England Commentary
	<p><i>'The valley and it's wooded sides, with natural seasonal flooding creating lush meadows, rich in wildlife and relative tranquillity in this busy part of the country have always been very special to me, and I consider it very beautiful. The landscape feels very characteristic of the area, with little change in recent years, small fields, thick hedges and sparsely scattered old buildings create a pastoral feeling and it is rich in nature. Not just the alder carr and it's heronry, but the mayfly and midge swarms above the river and the damselflies and bats feeding on them. The views across the valley are tranquil and the greenery uplifting. This is the place I always want to visit when I return to my home town.</i></p> <p><i>High landscape quality, with little change over many decades.</i></p> <p><i>The natural functioning of the river floodplain.</i></p> <p><i>The distinctive pattern created by the meandering river and pastures, with limited development.'</i></p> <p><i>The appeal and psychological benefits of the lush greenery and rich wildlife.</i></p> <p><i>Bats, birds, and insects are abundant.</i></p> <p><i>A sense of relative wildness and tranquillity.'</i></p> <p><b>ANON-VUXE-WEUM-6</b></p> <p><i>'It is a unique, peaceful setting in the river corridor and floodplain, wooded footpaths, a SSSI, bordering the Waverley Abbey Conservation Area with [a] Scheduled Monument to the south and the newly designated Shepherd and Flock Conservation Area to the north.</i></p> <p><i>The area feels rural and has a picturesque and peaceful ambiance.</i></p>	

Natural Beauty		
Theme	Representations	Natural England Commentary
	<p><i>Land use is dominated by sinuous medium-sized fields in pasture or meadows. Fields are bound by hedgerows and riparian vegetation, which provides a semi-enclosed landscape. There are small blocks of woodland and wooded foot paths [footpaths] as you climb northwest.</i></p> <p><i>The areas has man-made qualities with wooded footpaths lined with Sweet Chestnuts and a sense of history in each direction. Settlement is limited to isolated dwellings, which are frequently Listed Buildings, with associated formal gardens or parkland, leading on to a Site of Special Scientific Interest and on to the Monastery of Waverley Abbey.</i></p> <p><i>It is impossible to over-emphasise the importance of Waverley Abbey in the history of Farnham. Local road names remind us on a daily basis.</i></p> <p><i>Sir William Temple at Moor Park House and his choice of secretary, Jonathan Swift, who was inspired to write by his surroundings.</i></p> <p><i>When the family gave up the house in the 19th century, it was leased to Dr Edward Lane and became a hydrotherapy spa. Charles Darwin visited and wrote in his diary, "The country is very pleasant for walking. It is really quite astonishing and utterly unaccountable the good this week has been".</i></p> <p><i>The landscape changes with the water levels on the floodplain and the alder carr, waterlogged wooded terrain with water-plantain, marsh violets, golden-saxifrage and hemlock water-dropwort. Tree lined footpaths and open views of grazing land.'</i></p> <p><b>ANON-VUXE-W5D5-D</b>  <i>'It is a green and peaceful area.'</i></p>	

Natural Beauty		
Theme	Representations	Natural England Commentary
	<p><b>ANON-VUXE-WEC3-T</b>  <i>'The North Downs Way starts less than half a mile from the proposed extension, and enters the proposed extension under the railway viaduct. It this [thus] immediately leaves behind the urban surroundings and enters a peaceful oasis comprising meadow flanked by wooded hills. The North Downs Way is a major and popular national long-distance footpath, and designation of this area so close to the start will help ensure that the quietly dramatic and memorable impact of this scene continues to welcome long distance walkers as they start their journey.'</i></p> <p><b>BHLF-VUXE-WSQ1-M</b>  <i>'The flora is quite rich if one walks from above to the Abbey. Sadly the maintenance of the meadows and woodland adjoining is very poorly managed. Barbed wire and horses - very bad mixture.'</i></p> <p><b>ANON-VUXE-W555-X</b>  <i>'Beautiful natural landscape, winding lanes, many trees, abundance of wildlife, rolling meadows abutting the existing border with the AONB, a chalk stream.'</i></p> <p><b>ANON-VUXE-WEKZ-9</b>  <i>'A visually utterly delightful area. Not only for its inherent natural beauty stretching from Waverley Lane down to the valley of the [River] Wey, but also for the views across towards the other side of the [River] Wey.'</i></p> <p><b>ANON-VUXE-W54T-V</b>  <i>'It contains a mix of ancient woodland, river meadows and fields bounded by ancient hedgerows which between them provide a green corridor into the edge of Farnham and provide a haven for many</i></p>	



Natural Beauty		
Theme	Representations	Natural England Commentary
	<p><i>species of insects, birds, trees and wild-flowers include Red Kite, Kingfishers and Damselflies.'</i></p> <p><b>ANON-VUXE-W5YD-H</b>  <i>'It's historic significance as the area around England's first Cistercian Abbey at Waverley. This was the route the monks used when visiting the bishop in Farnham Castle.'</i></p> <p><b>ANON-VUXE-W513-R</b>  <i>'There is a sense of time-depth; in many respects the landscape looks just as it has for centuries. The cultural heritage is significant. Historically it is the land between the monks at Waverley Abbey and the Castle in Farnham itself. There is Ancient Woodland (Monks Walk) and Ancient Hedgerow along the B3001. The fields to the South of the B3001 may have been assarted (cut out of the medieval woodland). Going even further back, there was a large Neolithic settlement that clustered around the point where the Bourne Stream debouches into the Wey flood plain.'</i></p> <p><b>ANON-VUXE-W5Z2-Z</b>  <i>'References to Sturt, the Battle of Moor Park, the registered landscape, the significant remaining defences from the Second World War, many disguised. All tell the rich history of this area.'</i></p>	
<b>Area does not meet Natural Beauty Criterion</b>	<p><b>ANON-VUXE-WE2Z-G</b>  <i>'This area is a mix of flood plain and residential areas. Much of it will be located within the Farnham Settlement Zone where the principle of development is acceptable. Areas are also well wooded and therefore there are limited long views across the landscape. Whilst attractive, the landscape is not worthy of further protection. This is primarily a residential area.'</i></p> <p><b>ANON-VUXE-WEBP-P</b></p>	<p><b>Commentary</b></p> <p>Within the Adopted Farnham Neighbourhood Plan (2020) Compton lies inside the Built-Up Area Boundary but also within an area of High Landscape Sensitivity and Historic Value Areas (Policy FNP10). Moor House [Moor Park House] also lies inside of the Built-Up Area Boundary but within the South Farnham Arcadian Areas. Para 5.67 of the Neighbourhood Plan describes these areas as <i>'expressing strong Arcadian characteristic where the landscape is the dominant</i></p>

Natural Beauty		
Theme	Representations	Natural England Commentary
	<p><i>'It is semi urban and blighted by road noise, it is outside AGLV and greenbelt. Proposed aonb boundary in moor park [Moor Park] and old compton lane is arbitrary covering areas in the settlement zone and outside, the quality of moor park [Moor Park] is uniform therefore it should all be outside rather than inside. Areas included in AONB in this zone have not been assessed or visited even. This discredits this review.'</i></p> <p><b>ANON-VUXE-W5WY-4</b>  <i>'Your site and the immediate surrounding area are located within the identified Farnham Settlement Zone and therefore it would be inappropriate to be included in the AONB.'</i></p> <p><b>ANON-VUXE-WEVP-A</b>  <i>'the settled, more gently sloping upper slopes, do not [meet the Natural Beauty Criterion].'</i></p> <p><b>ANON-VUXE-WMMC-V</b>  <i>'farm hardstanding and equestrian area would not qualify'</i></p> <p><b>ANON-VUXE-W57F-H</b>  <i>'very little of my plot is open for outsiders to view, it has next to no amenity value.'</i></p>	<p><i>visual element. The well-wooded parts of The Bourne and Moor Park areas provide an important part of the setting of the AONB and a densely landscape transition into the town.'</i> This distinction between these areas and the more developed parts of Farnham settlement is also reflected in the extent of the AGLV designation which includes both Moor Park and Compton.</p> <p>The principle of development is not limited to within settlement zones but is also accepted within AONB designations although National Planning Policy Framework (Dec 2023) para 183 states that major development should be refused other than in exceptional circumstances.</p> <p>AONB designation can include areas of development, for example similar areas of development can be found within the AONB at Stone Hill to the east. When defining the extent of qualifying land for designation, settlement is considered on its merits and in relation to its landscape context. The area of Wey Valley, Farnham has been assessed through desk study and extensive field assessment. In this case, the settled areas form part of 'Acadian Areas' and landscape is considered to remain strong and dominant throughout. The areas of settlement are also located on the valley slopes which are heavily wooded and make a significant contribution to the perceptions of natural beauty within the valley as a whole. For these reasons, the boundary has been drawn to include these areas.</p> <p><b>Conclusion</b>  Natural England remains of the view that development at Compton and Moor Park is appropriate to include in this proposed Extension Area.</p> <p>Where respondents have gone on to request a change to the proposed Extension Area boundary these are considered below.</p>

Boundary		
Theme	Representation	Natural England Commentary
General agreement with proposed boundary	<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-W5XQ-W</b>  <i>'I agree with the proposed boundary designations for Wey Valley Farnham.</i></p> <p><i>The proposed boundaries are defined by recognisable landscape features - wooded slopes leading down to the River Wey and its tributary the Bourne Stream; a feeling of enclosure and definition by dint of the mature trees, ancient hedgerows and ancient woodland framing the area. All these elements provide consistent characteristics of natural beauty.'</i></p>	<p><b>Commentary</b></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>
Include Bourne Valley and Monk's Walk	<p><b>A number of respondents incorrectly interpreted the maps in the consultation documents as excluding the Bourne Valley and Monks Walk. Their representations therefore provided evidence as to why this area merits inclusion;</b></p> <p><b>ANON-VUXE-W5KB-1</b>  <i>'The map Figure11.1 has not been outlined correctly. The farmland to the west of Waverley Lane has been hatched but the outline designating sub area EA 1a does not cover it.'</i></p>	<p><b>Commentary</b></p> <p>The process of defining an area for designation requires the definition of an Evaluation Area. Natural England Guidance (para 4.4) is clear that these Evaluation Areas are to make the practical work of detailed evaluation more manageable and are not intended to lead to the designation or exclusion from designation of any land merely because of the way in which they have been defined. Natural</p>

Boundary		
Theme	Representation	Natural England Commentary
	<p><b>ANON-VUXE-WEUM-6</b>  <i>[Anon] notes that the proposed boundary to the southwest does not extend to Monks Walk [Monk's Walk], the area adjoining the Surrey Hills AONB, late medieval to 17th/18th century farmland with ancient woodlands and hedgerows and the Bourne Stream. This area has irregular rough grass and grazing fields, gently [gentle] slope to the Bourne Stream with wooded boundaries and enclosed views, the same qualities as the existing area within the Surrey Hills AONB on the other side of the road.</i></p> <p><i>The area is shaded area on the map of EA1a but outside of the proposed boundary.'</i></p> <p><b>ANON-VUXE-W5V3-W</b>  <i>'The area contains ancient woodland which extends up from Waverley Abbey and frames the central and southern fields to the south of Waverley Lane. Ancient Woodland is an irreplaceable habitat which supports all manner of flora and fauna. A stroll along the Public Right of Way between these two fields will also reveal the ancient bank dividing them, with very old trees (some designated as "veteran", and so protected in the same way as Ancient Woodland is) and also native bluebells, an ancient woodland indicator. Looking downwards into the Bourne Valley from the path – it is hard to understand why the land beyond Monks Walk [Monk's Walk] is designated as AONB and the fields currently are not. These are all part of the wooded sides of the Wey Valley River and its tributaries.</i></p> <p><i>Evidence shows that the Ancient Hedgerows have existed on Waverley lane since the era of tithes. They form the green corridor which is so important to the character of the southern approach to Farnham.</i></p>	<p>England acknowledges that on Figure 11.1 the Candidate Area extended beyond EA1a to include the Bourne Valley.</p> <p>Natural England is aware from consultation responses that there has been a misunderstanding regarding the extent of EA1a, the hatched Candidate Area (as shown on Figure 11.1) and the final proposed boundary (as shown on Figure 13). The concerns that the Bourne Valley and Monk's Walk are not within the proposed boundary are incorrect. The Bourne Valley falls within the proposed boundary extension (Figure 13).</p> <p>Natural England agrees that this tributary valley has special qualities that merit its inclusion within this Extension Area. The Bourne Stream is a tributary to the River Wey and the valley shares many of the qualities noted in the Natural Beauty Assessment Report.</p> <p><b><u>Conclusion</u></b></p> <p>No change to recommended inclusion of Bourne Valley with the exception of the deletion of land subject to the recently allowed planning appeal for residential development. See requests for the exclusion of land below.</p>

Boundary		
Theme	Representation	Natural England Commentary
	<p><i>Waverley Borough Council also believe we have special areas of woodland in the fields – in 2016 they designated a very extensive area of woodland to be protected - see TPO4/16 with the green shaded areas W1, W2 and W3 enclosed by a darker green border. It is unusual to have an area of woodland protected by a TPO (rather than individual trees), but Waverley tree experts obviously thought this needed doing.</i></p> <p><i>The deep wooded gully between these protected woods and Compton Copse, through which Waverley Lane passes as it descends to the stream, is a classic feature of the Surrey Hills Area of Outstanding Natural Beauty and should also be recognised as such.'</i></p>	
<p><b>Include Runfold Ridge Suitable Alternative Natural Greenspace</b></p>	<p><b>ANON-VUXE-W5HS-F</b>  <i>'It is an extension of the existing area and takes the boundary to the end of the Hog's Back as a natural cut off point. As a recently developed area for use by the general public this area should be included in AONB to secure the whole of the northern slopes of the Hog's Back as included in this special area.'</i></p> <p><b>ANON-VUXE-W588-4</b>  <i>'This area [Runfold SANG] forms part of the Hogs Back, formerly arable fields it has the potential to become a very diverse chalk grassland habitat. It is a new SANG which would benefit from the volunteers and funding a AONB could bring and is currently being restored to chalk grassland. Farnham Biodiversity Group and Butterfly Conservation are involved in the enhancement of habitat.</i></p> <p><i>The area has superb views of the surrounding area. Important recreational space.'</i></p>	<p><b>Commentary</b></p> <p>The Natural Beauty Assessment Report considered this area as part of EA1b. It noted at page 35 that the area around Runfold Ridge supports a mixture of land uses including woodlands and pastures – many of which have an equestrian use. It also describes the landscape as <i>'relatively fragmented landscape, which is in a variable condition, with an urban fringe character.'</i> On page 36, in relation to scenic quality, it describes views from the Hog's Back as <i>'open slopes...with wider views northwards across Tice's Meadow, but these views are within the wider vista of built development associated with Farnham.'</i></p> <p>Natural England is aware of the restoration of Runfold Ridge as Suitable Alternative Natural Greenspace (SANG), providing chalk grassland habitat and open access from former arable farmland.</p>

Boundary		
Theme	Representation	Natural England Commentary
		<p>Nevertheless, the aspect of this landscape is northwards with elevated views across the A31 corridor, Tice's Meadow and the settlement of Farnham extending up the opposite ridge. This land has an open aspect and noise of traffic on the A31/A331 has a significant effect on the experience of the area. The area is also separated from the wider AONB by suburban style development along the Hog's Back and West Ridge. Collectively, these influences result in this area being of lower quality, such that is not considered to meet the Natural Beauty Criterion.</p> <p>The site is undoubtedly important for local communities as an area of natural green space, with access and parking provided in the northwest corner of the site from Tongham Road. Furthermore, Natural England acknowledges that this area includes the end of the Hog's Back, a recognisable topographic feature. However, this is not a justification in itself for including land within an AONB. For land to be included in the AONB, the Natural Beauty Criterion must be met.</p> <p>The positive management of the Runfold SANG would be able to continue without AONB designation.</p> <p>Furthermore, the definition of a boundary further to the south does not prevent the AONB from working beyond its boundaries, where it can be shown to contribute to the purposes of the wider AONB designation.</p> <p><b><u>Conclusion</u></b></p> <p>No change.</p>

Boundary		
Theme	Representation	Natural England Commentary
	<p><b>ANON-PQ5Q-KR3Z-H</b>  SANG at Tongham – this area is a visual lead to the AONB as is the proposed addition to the north at Tongham (A1).</p>	<p><u>Commentary</u></p> <p>Natural England has previously set out (page 13-14 above) why the SANG at Tongham does not qualify for designation as part of the Surrey Hills AONB. Whilst the land may function as a visual lead to the AONB, it is separated by areas of development and infrastructure. Exclusion of this land does not prevent it from acting as a gateway to the AONB.</p> <p><u>Conclusion</u>  No change.</p>
<p><b>Include area between Wey Valley and Runfold Ridge south of the A31</b></p>	<p><b>ANON-VUXE-W5RY-Y</b>  <i>'You should consider the wildlife connectivity and the connectivity of landscape between this area and the Hogs [Hog's] Back. Currently, a 'notch' in the map northwards omits an area that includes Runfold Quarry and the surrounding countryside of Runfold. Whilst historically this area has included sand and mineral workings, the majority of these have been sensitively restored, and are being further worked on to enhance their landscape and biodiversity value. These areas should be included.</i></p> <p><i>The boundary assessment is out of date, filling of Runfold Quarry is now complete and forms an important agricultural landscape looking northwards from the North Downs Way. The assumption in the Farnham Neighbourhood Plan for recreational use only refers to one small part which is currently used by Barfield School. The planning permission for the remainder of the site is for agricultural restoration, including an emphasis on increasing biodiversity. These planning permissions reflect the latest situation. Also, the area eastwards includes Farnham Community Farm, and Runfold Ridge SANG, which is being restored to chalk</i></p>	<p><u>Commentary</u></p> <p>The Natural Beauty Assessment Report records the issues affecting this area as part of EA1b on pages 35-37. It notes that <i>'the slopes on the northwest side of the Hog's Back retain an open character comprising large irregular arable fields. Their aspect is northwest across the A31 corridor and towards the town of Farnham.'</i> It also notes a mixture of land uses including small woods and pastures, many of which have an equestrian use as well as development. It concludes <i>'overall, these influences give rise to a relatively fragmented landscape which is in a variable condition, with an urban fringe character. It also notes that the proximity to major transport routes has a marked influence on tranquillity.'</i></p> <p>Natural England notes that restoration of Hanson Quarry near Runfold Ridge is now complete and that only part of the site will be used for recreation with the rest used for agriculture. Natural England has reviewed the boundary in this area and the qualities of this landscape adjacent to, but beyond, the Wey Valley. Overall, Natural England remains of the view that this area does not qualify for</p>

Boundary		
Theme	Representation	Natural England Commentary
	<p><i>grassland. Again, these areas south of the A31 should be protected, and the A31 should form the northern boundary.'</i></p> <p><b>ANON-VUXE-W51N-K</b>  <i>'Much of this area is flood plain, it also contains ancient woodlands and hedgerows. It provides a green lung on the southern approach to the historic market town of Farnham. It is an area in which there is currently, and hopefully into the future, varied bird and wildlife. An extension of the AONB would help promote such biodiversity the value and extent of which is fast being lost - we humans are not the only inhabitants of this planet.</i></p> <p><i>This area includes previously excavated sandpits which were then used as landfill sites and that are currently undergoing reinstatement. For the reasons of its previous use plus some of the area being relatively steeply sloping (southerly side of Hogs [Hog's] Back) it is not ideal development land so please use this opportunity to protect it. The area is also crossed by the North Downs Way.'</i></p> <p><b>ANON-VUXE-W5Z2-Z</b>  <i>'I believe there is a strong case to include these areas in the AONB. They will complete a logical and readable extent enhancing the natural beauty of the Hills and protecting key areas for open air recreation, enjoyment and rich cultural association.'</i></p> <p><b>ANON-PQ5Q-KR3Z-H</b>  <i>'Land associated with Moor Park Farm (restored agricultural land following extraction) is excluded but is a vital part of the visual beauty of the area and is visually and physically connected to woodland along Moor Park Lane. If it is excluded because it does not meet the criteria then there is a conflict of interest with the SCC mineral planning conditions. Substantial tree planting</i></p>	<p>designation as a nationally important landscape and that the extent of the proposed boundary extension is appropriate.</p> <p><b><u>Conclusion</u></b></p> <p>No change.</p> <p><b><u>Commentary</u></b></p> <p>Natural England reviewed the boundary in this area following the first (2023) statutory consultation. Although the Hanson Quarry site is largely restored, the landscape is still recovering and re-establishing. Natural Beauty is assessed in terms of its current state and not in relation to its future potential. Although the scenic and landscape</p>



Boundary		
Theme	Representation	Natural England Commentary
	<p><i>has been carried out as part of the restoration.</i></p> <p><i>Position of North Downs Way should be considered as part of the National Landscape, not excluded.'</i></p>	<p>quality is likely to improve, it is unlikely to result in a landscape which would be considered nationally outstanding. This judgement is not regarded as conflicting with the SCC mineral planning conditions, in that these conditions do not seek to restore the landscape to a nationally outstanding landscape but, rather, to its previous character and condition.</p> <p>Whilst long distance routes offer opportunities to appreciate the special qualities of the landscape, the designation criteria for AONB's does not require the consideration of recreational opportunities. This is different to National Park designation, where recreational opportunities are a consideration.</p> <p><b>Conclusion</b> No change.</p>
Include valley floor north of railway line	<p><b>ANON-VUXE-WEV7-H</b></p> <p><i>'Site forms part of the North Wey floodplain; is a Local Wildlife Site (SNCI) for its nature conservation/biodiversity/ecological importance in a strategic/county context.'</i></p>	<p><b>Commentary</b></p> <p>The nature conservation interest of this site was noted within the Natural Beauty Assessment Report (page 34). However, the assessment also identified that this area forms a small linear area between the busy A31 and the railway which is on embankment. The land is therefore physically and visually fragmented from the wider Wey Valley and is adversely affected by its proximity to major transport routes (page 35). Furthermore, the area is heavily vegetated and lacks the combination of scenic qualities found within the wider Wey Valley. On balance, the railway line was considered to be a suitable boundary defining the Wey Valley landscape (Boundary Considerations Report pages 10/11).</p> <p>Features of interest on the margins of a qualifying area may be included where they form part of a tract of qualifying land (Appendix 4 Natural England Guidance). In this instance, the SNCI is not</p>

Boundary		
Theme	Representation	Natural England Commentary
	<p><b>ANON-PQ5Q-KR3Z-H</b></p> <p><i>'valley floor north of the A31 should be included as historically part of the same valley floor, visual links between Farnham and Waverley Abbey estate lands and superb views up the river from bridleway 123 Moor Park Lane.'</i></p>	<p>considered to form part of a tract of qualifying land, given its location and the influence of the intervening railway line.</p> <p><b>Conclusion</b></p> <p>No change.</p> <p><b>Commentary</b></p> <p>Natural England has interpreted this response as referring to the land south of the A31 and extending into the land within the A31/A325 interchange, as this land lies adjacent to Bridleway 123. The reasons for excluding this section of the valley and land within the junction are outlined above. While the evidence submitted by respondent <b>ANON-PQ5Q-KR3Z-H</b> has been noted, it does not sufficiently outweigh the negative impact of the physical and visual fragmentation caused by the A31 and the railway.</p> <p><b>Conclusion</b></p> <p>No change.</p>
Include all of Stoneyfields	<p><b>ANON-VUXE-W5DT-C</b></p> <p><i>'All of it is the only country lane in the area with each plot of covenanted size that past [passed] planners as necessary to protect.</i></p> <p><i>TPOs all along the area and already most of it is designated of similar but lesser status.'</i></p>	<p><b>Commentary</b></p> <p>Stoneyfields road is a relatively densely developed street which forms part of the wider settlement. None of the Stoneyfields road is proposed for inclusion.</p> <p><b>Conclusion</b></p> <p>No change.</p>

Boundary		
Theme	Representation	Natural England Commentary
Include Tice's Meadow	<p><b>ANON-VUXE-WEMD-N</b></p> <p><b>Scenic value:</b></p> <p><i>'This may have once been a quarry, but it is now a nature reserve. It is here to stay, and with its open water, woodland and reedbeds, it is now contributing greatly to the conservation and enhancement of natural beauty in the area. We are led to understand that the main issue for non-inclusion in the AONB concerns perceived coherence of Tice's Meadow with the rest of the Surrey Hills, as it is marginally divorced from the rest by the A31. If this is the case, we challenge this view strongly given that much of the AONB is segmented by roads or urban areas. There would be no logic to such an approach.'</i></p> <p><b>Natural Heritage Features:</b></p> <p><i>'As one of the best inland sites to watch birds in southeast England, Tice's Meadow now holds an important place in our natural heritage. It is astounding that it has gained that reputation so quickly. It could be a critical link in the restoration of nature in the UK. The National Biodiversity Network's website says: NBN Group Award 2022 Tice's Meadow Bird Group, (from Surrey), is the winner of the NBN Group Award 2022. Tice's Meadow Bird Group (TMBG) was formally established in 2014 and is involved with a local nature reserve. They carry out both regular formal ecological surveys and casual records – with the visiting public regularly encouraged to record and report their sightings. TMBG's bird database contains over 100,000 records, with over 21,000 sightings logged in 2021. These records are shared with the Surrey Bird Club and British Trust for Ornithology. Its pan-species list stands at over 1,500 species recorded at the nature reserve. The Group's annual BioBlitz includes walks for small mammals, dragonflies, butterflies, moths, bats and birds, as well as children's activities and stalls from local conservation groups. Their streaming web cameras inside Kestrel and Barn Owl boxes</i></p>	<p><b>Commentary</b></p> <p>The Natural Beauty Assessment Report records the natural heritage interest of Tice's Meadow and Natural England notes that the site continues to flourish as a nature reserve, of importance for bird populations, and SNCI, and is highly valued by visitors. Nevertheless, the Natural Beauty Assessment Report also highlights the urban context of the reserve and that it is fragmented from the wider AONB by the A31 and non-qualifying land to the south (although it is noted that this is changing with the establishment and management of Runfold Ridge SANG). Tice's Meadow therefore lies beyond the area of qualifying land. In order for Tice's Meadow to be included in the AONB, other areas to the south (including the A31) would also need to be designated. Whilst it is acknowledged that the conservation work at Runfold Ridge is enhancing the landscape to the south of the A31, issues relating to fragmentation, as noted in the Natural Beauty Assessment Report, remain. Overall, Natural England is of the view that natural beauty at Tice's Meadow and Runfold SANG is not outstanding and that the area does not comprise landscape of national significance. Natural England accepts that elsewhere in the AONB there are major roads which form part of the designation, however, it also notes that in accordance with Natural England Guidance (paragraph 5.3, 6<sup>TH</sup> bullet) there is greater scope for the inclusion of sizeable areas of land which do not themselves meet the technical criteria within the main body of a National Park or AONB, but that particular care is required at the margins of a designation. Para 6.12 states <i>'The effects of incongruous features are assessed for the extent to which they detract from the natural beauty of an area under consideration...the cumulative impact of such features and the degree to which qualifying parts of the potential designation are fragmented by incongruous features may be relevant to the assessment.'</i> In this instance, Natural England considers that Runfold Ridge and Tice's Meadow lie at the margins and that the</p>

Boundary		
Theme	Representation	Natural England Commentary
	<p><i>are particularly popular with the general public, and are used as teaching aids in local schools. [Anon], representing Tice's Meadow Bird Group – winner of the NBN Group Award 2022 – says: "Recording the wildlife found at Tice's Meadow Nature Reserve is a passion for our volunteers – a vital task that combines the joy of being outdoors and amongst nature, with important scientific effort. "Our volunteers conduct regular scientific surveys of the birds, moths, butterflies, dragonflies and bats on site, with all records uploaded to national schemes for analysis. "Findings from our biodiversity surveys are reported to the Site Aftercare Management Committee, and taken into account when planning future habitat management and improvement works. The records have also been used in the campaign for the site's very future, and formed a key piece of evidence that led to the six local councils combining to buy the site and save it for the local community. "Finding new species for [at] site is a cause for excitement, as is discovering new breeding species, and identifying positive recoveries in threatened species that have been targeted with habitat management to increase their chances." Tice's Meadow Nature Reserve is a designated Site of Nature Conservation Importance (SNCI). It connects with the Blackwater River which is a Surrey River Biodiversity Opportunity Area (BOA) R03: Blackwater River. The Priority Habitats listed are: Rivers, Floodplain grazing marsh, Meadows, Wet woodland, Standing open water, Reedbeds. The Priority Species listed (although some may be extinct in the BOA) are: Plants: Marsh stitchwort, Pillwort, Tubular water-dropwort; Rusty fork-moss Invertebrates: Small heath, White-letter hairstreak, Stag beetle Vertebrates: Bullfinch, Cuckoo, Dunnock, Lapwing, Lesser spotted woodpecker, Linnet, Reed bunting, Skylark, Song thrush, Spotted flycatcher, Willow tit, Yellowhammer; Common lizard, Grass snake, Slow-worm, Common toad, Great crested newt; Brown long-eared bat, Harvest mouse, Hedgehog, Noctule</i></p>	<p>combination, of the A31 and the urban context of these sites, means that neither Tice's Meadow nor Runfold Ridge meet the Natural Beauty Criterion and do not form part of a tract of wider qualifying land.</p> <p>The positive management of the Tice's Meadow would be able to continue without AONB designation and the definition of a boundary further to the south does not prevent the AONB from working beyond its boundaries, supporting conservation work, where it can be shown to contribute to the purposes of the wider AONB designation.</p> <p>On balance, therefore, Natural England considers the existing AONB boundary should not be extended to include Tice's Meadow.</p> <p><b><u>Conclusion</u></b></p> <p>No change.</p>

Boundary		
Theme	Representation	Natural England Commentary
	<p><i>bat, Otter, Soprano pipistrelle bat, Water vole; Brown trout, European eel. Further important species interest: Elongated sedge, Great burnet, Lesser pondweed, Marsh speedwell, Needle spike-rush, Six-stamened waterwort, Small pondweed; Brilliant emerald, Downy emerald, Scarce chaser (all dragonflies), Variable damselfly; Barn owl, Grey wagtail, Little ringed plover, Kingfisher, Water rail.'</i></p> <p><b>Relative Wildness and Tranquillity:</b>  <i>'The site forms an escape for people from nearly urban areas to exercise, relax, take families. It is also an important site where people carry out voluntary work. It is also a site where people can go to spend time or go birdwatching in what now appears to be one of the finest nature reserves in the country.'</i></p> <p><b>Boundary:</b>  <i>'The site has a clear boundary of the old quarry site, and is bordered by, but distinct from, urban areas and the A31. Although the A31 splits the AONB to the south, [Extension] Area EA2 Hog's Back also falls north of the A31, is recommended for inclusion, and connects with Area EA1b. Both these areas are on the north side of the Hog's Back. Tice's Meadow is also important for connecting nature. The Blackwater Valley, which runs through parts of Surrey, and connects with the site, is being rewilded according to the website. Public access along the connecting wildlife areas of the Blackwater Valley, for walking in nature, looks to be an important and increasing amenity. We strongly recommend that Tice's Meadow is included in the AONB extension. We feel it is a glaring omission from the current Conclusion. We think that, given the time the AONB extension process has taken, consideration for inclusion in the AONB has not kept up with the changes taking place at the site. The reasoning even omits to mention the birds at the site. Yet it has</i></p>	

Boundary		
Theme	Representation	Natural England Commentary
	<i>become a nationally important nature reserve in the last few years.'</i>	
<b>Include Farnham Old Park</b>	<b>ANON-VUXE-W51R-Q</b> <i>'It is a shame that we cannot extend the boundary further to take in the Ancient Deer Park of Farnham [Farnham Old Park] and the areas around the peripheral edge of the park, to protect this area of Farnham also for future generations to come.'</i>	<p><b><u>Commentary</u></b></p> <p>The evaluation of Farnham Old Park is set out in the Natural Beauty Assessment Report pages 38-40. Only land which qualifies in terms of its natural beauty can be considered for designation as AONB. No additional evidence has been provided in relation to natural beauty and Natural England therefore maintains its view that this area should not be included within the proposed AONB boundary extension. Issues relating to protecting land from development are considered in detail in relation to Desirability (Appendix 2).</p> <p><b><u>Conclusion</u></b></p> <p>No change.</p>
Requests for Exclusion of Areas		
<b>Exclude garden of Brocks Dene</b>	<b>ANON-VUXE-W57F-H</b> <i>'You have included my garden in the extension. Very little of my plot is open for outsiders to view, it has next to no amenity value. There are some steep slopes along the footpath from Tilford Road to Waverley Lane, these are already subject to TPOs but the rest of the plot is either garden curtilage or domesticated parkland that I regularly mow. how can you include my children's tree house and the tennis court in AONB? This is nonsense.</i>	<p><b><u>Commentary</u></b></p> <p>Natural England acknowledges that the property of Brocks Dene is included within the proposed extension. This property sits within the undulating landscape which defines the Bourne Valley – a heavily wooded landscape including areas of ancient woodland. Natural England has sought to define a boundary which follows clear features on the ground and which is not overly convoluted. Where visual and/or physical access to the boundary line is not possible, Natural England relies on Google Earth and Mastermap to assist with</p>

Boundary		
Theme	Representation	Natural England Commentary
	<p><i>Since Victorian times, my land has been used as the local dump. It's hardly pristine wilderness. We are on the fringe of town, less than 10 minutes walk to the station and under an hour from Waterloo. This is suburbia not the lake district [Lake District].'</i></p>	<p>defining a boundary (para 2.2.4 Boundary Considerations Report). The boundary in this area was defined on this basis and sought to include the valley landscape but minimise the creation of a convoluted boundary. It is not unusual for land which is designated as AONB to contain settlement and individual properties and their domestic curtilage where they form part of an area of qualifying land.</p> <p><b><u>Conclusion</u></b></p> <p>No change.</p>
Land off Waverley Lane	<p><b>ANON-VUXE-WEVP-A</b>  <b>A detailed submission was made in relation to proposed housing development off Waverley Lane. The respondent considered that:</b></p> <p><i>'the floodplain of the Wey Valley, and the steep slopes immediately adjacent to the floodplain, meet the criteria for designation as an AONB, [but] the wider candidate AONB, in particular the settled, more gently sloping upper slopes, do not.'</i></p> <p>Reasons given include:</p> <ul style="list-style-type: none"> <li>one third of the candidate area comprises low density residential areas, and that these areas are also classified as settlement within both the Surrey Landscape Character Assessment and the Farnham Landscape Character Assessment.</li> <li>the AGLV did not extend over the whole of the candidate AONB area, and that a previous assessment by HDA concluded that only the valley floor of the River Wey should become part of the AONB.</li> <li>no consensus that all of the Wey Valley candidate AONB is of sufficient quality to justify designation as an AONB.</li> </ul>	<p><b><u>Commentary</u></b></p> <p>The comments raised by this respondent are made in the context of a planning application for 146 houses off Waverley Lane. This site lies between Compton and Bourne Valley and was allowed in July 2023 following a public inquiry. Given this planning decision, the proposed density of development on the site and its contiguous nature with the existing urban edge of Farnham, Natural England has concluded that the housing site should be excluded from the proposed boundary and a minor boundary change is therefore proposed.</p> <p>Broader issues raised by the respondent, relating to the extent to which flatter developed areas of land such as at Compton should be excluded, were also reviewed especially in the context to which they relate to the Wey Valley proposed boundary extension as a whole.</p> <p>The Natural Beauty Assessment Report highlighted that the natural beauty of the Wey Valley is derived from the combination of valley floor and valley sides. To designate only the valley floor would not reflect the natural beauty of the valley as a whole. Nevertheless, the Natural Beauty Assessment Report also highlighted that, to include the valley sides, particular care would be required where there is development (Compton and Moor Park), whilst also noting that in</p>

Boundary		
Theme	Representation	Natural England Commentary
	<ul style="list-style-type: none"> <li>the Natural Beauty Assessment Report does not differentiate between the distinctive, steep, wooded, greensand slopes that define the valley and the more gently grading, settled slopes that occur above these; instead, all slopes around the Wey Valley are included in the candidate AONB, regardless of their landscape and visual contribution to the Wey Valley.</li> <li>...the residential areas of Compton and Moor Park, which are located on...more gently sloping areas, are ..... included in the candidate AONB .</li> <li>the extent of residential development and private gardens within the candidate AONB: of a total area of approximately 202ha, around 70.8ha, or 35% of the total area of the candidate AONB is occupied by houses and private gardens.</li> <li>significant tree cover.... notable proportion of those trees are non-native, and that the estate roads (such as Monks Well, Temple's' Close and Compton Way), are typically defined by closely trimmed, non-native hedgerows and trees. Houses in these areas are large, in well managed gardens, typically of 20<sup>th</sup> century origin and lack distinctive or vernacular features. The roads in these areas are typically edged by mown grass verges with laurel, conifer or rhododendron hedgerows and non-native trees....</li> <li>there is very little evidence in the Natural Beauty Assessment Report that all of the Wey Valley candidate AONB meets the six Natural Beauty Criteria: a strong case is made for the Wey Valley, but the case for the valley sides to the north and south is very weak.</li> <li>Inspector at the Waverley Lane Appeal (see appeal reference APP/R3650/W/15/3139911, 24<sup>th</sup> January 2017), which is a site wholly within the candidate AONB,</li> </ul>	<p>both cases the arcadian qualities were highlighted in the Farnham Neighbourhood Plan and that the density of development was low, and properties loosely arranged such that the landscape flowed through the areas and remained dominant. The low density of development is reflected in the AGLV designation which includes these settled areas.</p> <p>The existence of housing per se is not an impediment to designation as AONB. Natural England Guidance is clear that settlements are considered on their merits. Both Compton and Moor Park are low density, and comprise properties set within extensive grounds or nestled within the folds of the landscape and shrouded in woodland. Neither area of development adversely impacts on the qualities of the area as a whole and, whilst more urban in character, they do not detract from the qualities of the wider valley landscape. Both are noted in the Farnham Neighbourhood Plan as expressing arcadian qualities.</p> <p>Natural England Guidance is clear that not all natural beauty factors need to be met for an area to qualify for designation but that there needs to be a weight of evidence of natural beauty. Natural England considers that within the proposed Wey Valley extension, the Natural Beauty Criterion is met.</p> <p><b>Conclusion</b></p> <p>Minor deletion to exclude permitted housing development off Waverley Lane.</p> <p>(Deletion 1 – Refer to Figure 13b)</p>



Boundary		
Theme	Representation	Natural England Commentary
	<p>concluded that this site was influenced by suburban elements to the west of Old Compton Lane, (see paragraph 6.44). He also concluded that the site “lacked significant attributes which would elevate it to something more than open countryside”, and consequently that it would not be considered to be a valued landscape in the sense of paragraph 109 (now 174(a)) of the National Planning Policy Framework (see paragraph 6.54) There is therefore consensus that the floodplain of the River Wey should form part of the AONB, but no consensus that the wider area of the candidate AONB should be designated.</p>	
<p><b>Support for proposed Deletion 1</b></p>	<p><b>26 respondents agreed with Deletion 1, some providing reasons for their view as follows:</b></p> <p><b>ANON-PQ5Q-KR3Y-G (Waverley Borough Council)</b>  <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 .....  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><b>Commentary</b></u></p> <p>Natural England acknowledges the support for this deletion but also notes that some respondents wish to comment on the boundary and this is set out below.</p>

Boundary		
Theme	Representation	Natural England Commentary
	<p><b>ANON-PQ5Q-KR4R-A</b>  <i>'This site has planning permission for 146 new homes and associated infrastructure....The approach of the planning inspector has been endorsed by a High Court Judge.....land at Waverley Lane should never been suggested for designation as AONB and it deletion is supported.'</i></p> <p><b>ANON-PQ5Q-KRRS-9</b>  <i>'..Whilst I would have felt that this area was originally suitable for inclusion, I reluctantly accept that the specific area for which a planning application has recently been approved is no longer likely to be suitable for ANOB [AONB] designation.'</i></p>	
Support Deletion 1 but wish to comment on the boundary	<p><b>2 respondents wished to comment on the boundary and submitted almost identical responses:</b></p> <p><b>ANON-PQ5Q-KR8W-K and ANON-PQ5Q-KR3V-D</b>  Agreed with the proposed deletion and requested further land be removed at Culver Farm and development along Old Compton Lane. The reasons given include:</p> <p><i>'1. My site and the immediate surrounding area are located within the identified Farnham Settlement Zone and therefore it would be inappropriate to be included in the AONB.</i></p> <p><i>2. There are substantial areas of AONB within the immediate vicinity of my site which are already protected by Local Plan policy, are designated as Area of Special Environmental Quality (ASEQ) and Area of Great Landscape Value (AGLV).</i></p> <p><i>3. Local Plan policies already stipulate that AGLV should be offered the same protection as the AONB and therefore, no further protections are required.</i></p>	<p><u>Commentary</u></p> <p>The Natural Beauty Assessment sets out the reasons why the land at Culver Farm and Old Compton Lane was suitable for inclusion with the Wey Valley extension (pages 32-35) noting strong Arcadian characteristics, dominance of landscape despite some development and domestication, and importance of the wooded valley slopes in providing the context to the valley floor pastures. The Boundary Considerations Report set out the reasons for including development within the proposed boundary (page 11).</p> <p>Issues relating to the boundary and settlement were also raised during the first (2023) statutory consultation. Natural England provided a response on pages 9-10 above. This addressed concerns regarding the Farnham Settlement Zone and AGLV.</p> <p>Natural England acknowledges the resource pressures on the existing AONB. Concerns associated with this are addressed in Appendix 2, pages 31-32.</p>

Boundary		
Theme	Representation	Natural England Commentary
	<p><i>4. The Surrey Hills AONB planning department is already over-stretched, inefficient and ineffective. There is a good argument for areas of AONB to be reduced in this area to enable the department to manage those areas under its jurisdiction more effectively.</i></p> <p><i>5. This additional area of AONB would butt immediately up to the Farnham Settlement zone rather than the normal grading of land around them, for example Countryside beyond the Green Belt or AGLV, and then reduce to the point when it becomes a formal settlement zone. It is inappropriate for there to be a sharp distinction between the AONB and settlement zones.</i></p> <p><i>6. We have not seen a proper landscape assessment carried out by a suitably qualified body in person which rigorously identifies the quality of the landscape in question and confirms that it is of an appropriate level of quality to be included in the AONB.'</i></p>	<p>Natural England does not agree that there is a need for National Landscapes to not abut settlement, or for there to be a 'grading of land'. This is not the case with existing designations, nor is it a requirement in the Natural England Guidance for assessing landscape for designation. Nevertheless, Natural England notes that in some instances there is a transition in landscape quality towards an urban edge. In this instance, Natural England is of the view that overall, the area warrants inclusion within the designation as part of the Wey Valley, despite some development, and that the character and qualities of the landscape remain dominant.</p> <p>All evaluation work has been carried out by suitably qualified professionals in accordance with Natural England Guidance. The detailed documentation of the assessment aims to provide robustness and transparency in judgments which are made.</p> <p><b>Conclusion</b> No change.</p>
Object to Deletion 1	<p><b>12 Respondents objected to the proposed Deletion 1, and some provided reasons for their views as follows:</b></p> <p><b>ANON-PQ5Q-KRP6-A</b> <i>'As a regular local user to the D1 area three things are clear...</i></p> <p><i>a) The D1 area in question is of exactly the same beauty, form and nature as the area chosen for AONB: there is no natural reason to exclude it from the proposal.</i></p> <p><i>b) Choosing to delete the area can only be an egregious retrograde action to accommodate a powerful developer</i></p>	<p><b>Commentary</b></p> <p>As noted by respondent <b>ANON-PQ5Q-KR4R-A</b> the case which was taken to the High Court has now been concluded and the planning permission associated with Deletion 1 is upheld.</p> <p>Natural England is therefore content that this land remains outside the proposed boundary extension. Appendix 4 of the Natural England Guidance is clear that land on the margins of an AONB, with planning permission for major built development, should normally be</p>

Boundary		
Theme	Representation	Natural England Commentary
	<p><i>continuing to pursue their efforts with seemingly bottomless legal resources (and bottomless morals...see local link below), yet...</i></p> <p><i>c) The case is not yet concluded. Farnham Town Council lodged a Statutory challenge in the High Court against the 2023 approval of the scheme to develop 146 homes on green fields that were a candidate to become part of the Surrey Hills Area of Outstanding Natural Beauty. The Council believe the Planning Inspector has not considered sufficiently the Farnham Neighbourhood Plan policies (remember this is the Council objecting, not residents, so something really is amiss) and the harm that this decision would bring in removing the proposed site and the surrounding area from protected status in perpetuity. The Council state that this rural site is characterised as being of high landscape value and sensitivity and worthy of inclusion in an Area of Outstanding Natural Beauty (AONB).</i></p> <p><i>See <a href="https://www.farnham.gov.uk/2024/07/farnham-town-council-rejects-unorthodox-request-to-drop-high-court-challenge">https://www.farnham.gov.uk/2024/07/farnham-town-council-rejects-unorthodox-request-to-drop-high-court-challenge</a>. Absent a conclusion of the High Court case, such an obviously weird carve-out opens the authors of your plans out to subsequent legal challenge and a complaint of misdirection of duty. Whilst one appreciates the need to get the AONB extension sorted, taking such action is prejudicial to the remaining case if D1 is upheld as a carve out. Doing so at the wishes of the developer is putting a government organisation as organisers of such wishes.</i></p> <p><i>In business, such a large risk with obviously possible negative consequences should only be made consciously by an organisation with the blessing of the CEO and an independent legal opinion on file (to avoid in-house legal prejudices and insure the company against inflated damages). The authors and executors of the AONB plans would do well to follow that process. Even if Farnham Town Council lose their High Court</i></p>	<p>excluded. On this basis Natural England does not agree with respondents who wish to see this land included within the proposed boundary extension.</p> <p><b><u>Conclusion</u></b> No change.</p>

Boundary		
Theme	Representation	Natural England Commentary
	<p><i>judgement, carving out an initially proposed area so obviously for the developer has risks of future legal challenge.'</i></p> <p><b>ANON-PQ5Q-KRR3-9</b>  <i>'I would line [like] all proposed deletion to remain as AONB/National Landscape and not removed from the AONB'</i></p> <p><b>ANON-PQ5Q-KRZF-4</b>  <i>'This land is very important for its scenic value and is precisely the sort of land that should be protected. Building on this land will cause urban sprawl and destruction of our countryside. It will also mean the destruction of the rural area that I have grown up with and love. The country walk between South Farnham's Waverley Lane and The Spotted Cow will become a walk through a town. Also the country walk from Waverley Lane into Moor Park will become a walk thorough [through] a town. The feel of the whole area will be changed from delightful countryside to suburbia.'</i></p>	
<p><b>Exclude land south of Moor Park Lane and north of Moor Park Way i.e. water meadows only should be designated</b></p>	<p><b>ANON-VUXE-WMMC-V</b>  <i>'Farm hardstanding and equestrian areas would not qualify on a visual assessment...</i></p> <p><i>You have excluded the sand pit development on the NE [northeast] boundary so why include the residential development at Moor Park and Kilinside farm.</i></p> <p><i>The issue of solar panels is divisive and discriminatory.</i></p> <p><i>There is already enough protections for the han gers with blanket TPOs with the residential area that is Rock house. Rock house is also out of site of anyone using the North Downs Way . The exclusions show an inconsistency in the proposed designations</i></p>	<p><b><u>Commentary</u></b></p> <p>The Natural Beauty Assessment Report noted that the qualities of the Wey Valley landscape derive from both the valley floor meadows and woodlands and the steep wooded valley sides which define the valley. It also noted that the valley sides contain some development.</p> <p>In seeking a boundary which defined the whole of the valley (including the valley sides) and ensuring that a clear boundary line was adopted, it was necessary to include properties on the south side of Compton Way and properties at Rock House Lane including Kilinside Farm which forms part of the valley side landscape.</p>

Boundary		
Theme	Representation	Natural England Commentary
	<p><i>and seem to be more to do with proposed brown field sites rather than the area's natural beauty. There is no basis for proposing one side of Compton Way and not the other side.'</i></p>	<p>Natural England reviewed the boundary in the vicinity of Rock House and agree that this property, and the flatter land associated with it, lie beyond the valley.</p> <p><b><u>Conclusion</u></b></p> <p>Minor deletion to refine the boundary, excluding flatter land to the north of the valley around Rock House. The proposed boundary follows the outer edge of woodland on the steep valley sides.</p> <p>(Deletion 2 – Refer to Figure 13b)</p>
<p><b>Support for the proposed Deletion 2</b></p>	<p><b>22 respondents agreed with Deletion 2 although they did not provided reasons for their view. Statutory consultee support included:</b></p> <p><b>ANON-PQ5Q-KR3Y-G (Waverley Borough Council)</b>  <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 ..... 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><u>Commentary</u></b></p> <p>Natural England acknowledges the support for this deletion.</p> <p>9 respondents did not agree with the proposed deletion and only one provide a reason for their view which is set out below.</p>

Boundary		
Theme	Representation	Natural England Commentary
Object to Deletion 2	<p>1 respondent provided a reason for their view:</p> <p><b>ANON-PQ5Q-KR3Z-H</b></p> <p><i>'...for some un bekown reason the Listed G2 rock house grounds have been cut in three by the deletion. Again consistency seems to be missing from the mapping.</i></p> <p><i>Area 1 [steep wooded bank south of Rock House] and 2 [garden curtilage and driveway to Rock House] as marked on the attached map should be either included or removed. Area 3 [former gravel extraction site east of Moor Park Farm] in the attached plan as with area 2 seems to be excluded for no reason. They are either a vital part of the visual beauty of the area as they are connected both visually and physically to the woodland along Moor Park Lane. You cannot have one without the other. The area 2 is part of the listed garden curtilage of D2 [Rock House] and area 3 is the restored agricultural land giving the distant views over the Moor Park Valley from the public rights of way. If it is considered that the restored agricultural land does not meet the criteria then there is a conflict of interest with the SCC mineral planning conditions and other vested interests. Substantial tree planting has been carried out on Moor Park Farm as part of the restoration to link it with retained designated land along Moor Park Lane.'</i></p>	<p><u>Commentary</u></p> <p>When defining a boundary, Natural England does not take account of land ownership but considers whether the land meets the Natural Beauty Criterion and applies the boundary setting considerations as set out in Appendix 4 of the Natural England Guidance. In this instance, the land to the north of Rock House was excluded as it forms flatter and less distinctive land beyond the Wey Valley. Land south of Rock House was included because it forms the steep banks demarcating and defining the extent of the valley landscape. Natural England does not consider that the proposed boundary shows inconsistency.</p> <p>The land to the east of Moor Park Farm is partially restored but is not considered to meet the Natural Beauty Criterion as set out on pages 15-16 above. The wooded slopes along Moor Park Lane are proposed for inclusion within the boundary extension.</p> <p><u>Conclusion</u> No change.</p>