

Appendix 4: Hogs Back

Please refer to Figures 14b and 14c (update following second (2024) statutory consultation).

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

Overview

Question C1: Does the Hog's Back Extension Area have sufficient Natural Beauty to be designated as AONB?

Natural Beauty	Responses
Yes	216
No	3
Not sure	3

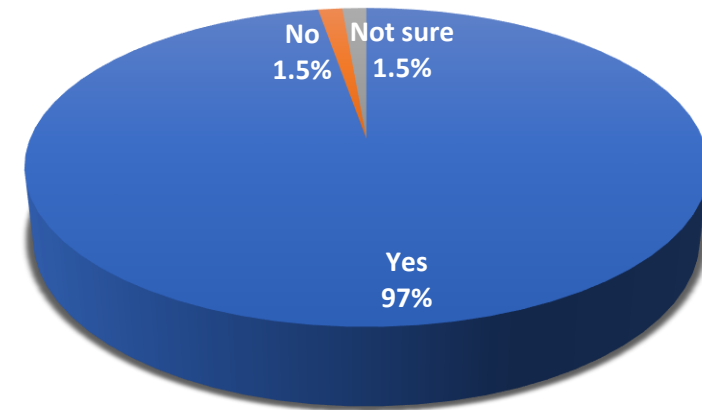
Of the 222 respondents, 216 (97%) felt that the Hog's Back Extension Area had sufficient natural beauty to be designated as AONB.

In contrast, 3 of the respondents (1.5%) felt that the Hog's Back Extension Area does not have sufficient natural beauty to be designated as AONB.

Desirability reasons for including and excluding land within the proposed extension tended to focus on planning issues. Those in support saw the designation as appropriate to address development pressure, nature

conservation, access and inappropriate development, those against designation raised issues to do with house prices and housing delivery. These issues are addressed in Appendix 2.

Hogs Back - Sufficient natural beauty to be designated



Question C5: Do you agree with the proposed boundary for the Hog's Back Extension Area?

Boundary	Responses
Yes	116
Yes, but I wish to suggest an alternative	59
No	21
Not sure	22

Of the 218 respondents who answered question C5, 116 (53%) agreed with the proposed boundary for the Hog's Back Extension Area and a further 21 respondents (10%) did not. 59 respondents (27%) wished to suggest an alternative boundary for the Extension Area. Many of these provided supporting evidence.

Although this area attracted a large number of responses, a substantial number were identical submissions and some respondents made multiple submissions.

A significant number of respondents requested additional land to the west of White Lane in the Tongham area, although a number of different boundary options were put forward. Another area which attracted a significant number of responses was land close to Blackwell Farm.

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

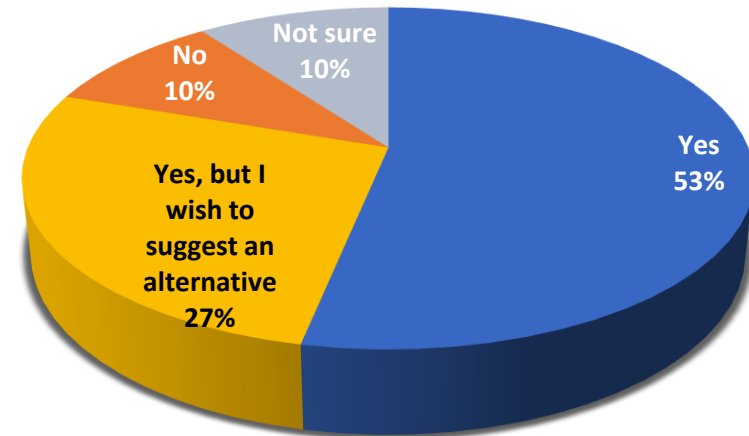
- Land west of White Lane to The Street and north of Poyle Road
- Land east of Ash Green
- Settlement of Tongham and Ash Green
- Land north of the railway
- Land east of Flexford Road
- Land at Backside Common south of the railway
- Manor Copse and Strawberry Grove
- Blackwell Farm and proposed access

- Sutton Place Park, Sutton Green and Wey Floodplain.

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

- Northern fringes in vicinity of Wildfield Copse

Hogs Back - Agreement with the proposed boundary



During the second (2024) statutory consultation, responses were received regarding **Addition 1: Land at Tongham and Deletion 3: Land north of West Flexford Farm**. Natural England has reviewed these areas and provided further commentary in blue below.

Since the second (2024) statutory consultation, planning permission has been granted for a solar farm at Blackwell Farm. Natural England has therefore reviewed the boundary in this area also and provides commentary in blue below.

Natural Beauty		
Theme	Representations	Natural England Commentary
The proposed extension meets the Natural Beauty Criterion	<p><u>Agreement</u></p> <p>ANON-VUXE-W5UR-U (Surrey County Council) <i>'Surrey County Council Supports all the proposed extension/refinement areas being designated as part of the Surrey Hills AONB/National Landscape.'</i></p> <p>ANON-VUXE-WSK2-F (Guildford Borough Council) <i>'GBC agrees with the accompanying assessment that the quality of the proposed areas is of sufficient natural beauty to be included in the AONB. For clarity, within Guildford borough these comprise the following areas:</i></p> <ul style="list-style-type: none"> • <i>Hog's Back – Fig 14</i> • <i>Binscombe Hills and Wey Valley, Farley Hill – Fig 15</i> • <i>Cranleigh Waters – Fig 17</i> • <i>Hatchlands and East Clandon – Fig 18'</i> <p>ANON-VUXE-WEEH-H <i>'Landscape and scenic aspects are beautiful.'</i></p> <p>ANON-VUXE-WEZR-G <i>'It is beautiful'</i></p> <p>ANON-VUXE-WECY-Z <i>'The area has great beauty'</i></p> <p>ANON-VUXE-WEHY-5 <i>'I have enjoyed walking through this area many times - it IS beautiful in all seasons.'</i></p> <p>ANON-VUXE-WEY6-K <i>'The Hogs back is distinctive landscape that is unique to the area.'</i></p>	<p><u>Commentary</u></p> <p>Natural England agrees that land within the proposed Extension Area meets the natural beauty criterion for designation as AONB and that additional evidence provided by respondents supports the findings of the Natural Beauty Assessment.</p> <p>Natural England has also taken account of detailed responses requesting changes to the boundary and proposes some amendments. These are set out below.</p>

Natural Beauty		
Theme	Representations	Natural England Commentary
	<p>ANON-VUXE-WET1-9 <i>'Views alone are outstanding'</i></p> <p>ANON-VUXE-WEY6-K <i>'The Hogs back is distinctive landscape that is unique to the area.'</i></p> <p>ANON-VUXE-WMXR-P <i>'unique landscape'</i></p> <p>ANON-VUXE-WE9A-X <i>'The Hogs Back is unique.'</i></p> <p>ANON-VUXE-WEZ6-M <i>'The Hogs Back forms part of the continuity of the beautiful tranquil landscape around Guildford - it is a haven and I can't believe it's not part of the AONB already! It would be crazy to have only one side of the Hogs back protected. It is stunning - the views are spectacular'</i></p> <p>ANON-VUXE-WE9B-Y <i>'Wonderfully natural, sweeping picturesque landscape which must be preserved at all cost for future generations to appreciate and feel at ease in.'</i></p> <p>ANON-VUXE-WMNQ-B <i>'It's one of the highest ridges in the south of England with incredible views north and South.'</i></p> <p>ANON-VUXE-WESY-G <i>'Amazing views north from the slopes of the Hogs Back to cover the northwest Surrey area. Home to historic hop growing and farming.'</i></p> <p>ANON-VUXE-WEQS-8 <i>'Stunning rolling hills, views for miles, from the top of the Hogs Back.'</i></p>	

Natural Beauty		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<p>ANON-VUXE-WEZR-G <i>'Rolling hills with lush green land and some forestry'</i></p> <p>ANON-VUXE-WM6Y-U <i>'From a vantage point of the Hogs Back, the current designation and proposed extension incorporates the entire sweep of open land down to the London Plain and the start of significant habitation, with the hamlet of Wanborough nestled in it. This remains one of the largely unspoilt "big views" in this part of Surrey. A rare thing given the development going on all around this area (Tongham, Ash, Normandy, Blackwell Farm).'</i></p> <p>ANON-VUXE-WENZ-C <i>'It is a wide, expansive landscape, which provides unspoiled views for many miles. The views are panoramic in many directions. The natural beauty covers a range of different habitats, which adds to its many charms. Not only is it beautiful to look at, the area provides serenity and peace, where bird song can be enjoyed.'</i></p> <p>ANON-VUXE-WEWY-M <i>'It contains a number of extensive areas of ancient woodland, natural springs, settlements and farmland which provide high landscape and scenic qualities. Especially when seen from the top of the Hog's Back.'</i></p> <p>ANON-VUXE-WEEK-M <i>'Hogs Back is an awe-inspiring tapestry of untouched landscapes that captivates the soul. Every corner of Hogs Back offers a picturesque spectacle. The juxtaposition of vibrant colours, the harmony of diverse ecosystems, and the tranquillity of untouched vistas create an aesthetic and sensory experience that is unparalleled. Designating Hogs Back as an Area of Natural Beauty ensures that future generations can revel in its magnificence.'</i></p>	

Natural Beauty		
Theme	Representations	Natural England Commentary
	<p>ANON-VUXE-WMNQ-B <i>'For years the Hogs back has been farmland with a diversity of wildlife.'</i></p> <p>ANON-VUXE-WEF9-3 <i>'This area is rich in natural history and should be protected'</i></p> <p>ANON-VUXE-WM6Y-U <i>'The varied landscape supports a wide variety of wild plants and animals.</i></p> <p><i>The Great Barn [Wanborough] and the adjacent Granary are roosts for Brown Long Eared bats and Pipistrelle bats, the former as a breeding colony (we work with the Bat Conservation Trust to protect and enhance these colonies).</i></p> <p><i>This is a very ancient landscape. The area is on the spring line and as a result people have lived here for as long as there have been people in this part of Surrey. Ancient Britons, Romans, Anglo Saxons, Normans, Cistercians and more recent inhabitants have all left their mark on this landscape.</i></p> <p><i>The village of Wanborough contains a number of old and listed buildings associated with the agricultural development of the area. Most notable is The Great Barn of Wanborough, built in 1388 by Cistercians from Waverley Abbey. The building is owned by Guildford Borough Council and operated by local volunteers through the Wanborough Barn Management Committee, (WBMC).'</i></p> <p>ANON-VUXE-WENZ-C <i>'The natural and varied fauna and flora provide a rich changing landscape through the seasons. Each season brings its own charm. The landscape provides a natural, safe habitat for local wildlife. The different habitats with trees, ponds, hedgerow attract a rich variety of</i></p>	

Natural Beauty		
Theme	Representations	Natural England Commentary
	<p><i>wildlife, which adds to the natural beauty and enhances the enjoyment of the area.'</i></p> <p>ANON-VUXE-W5S7-X <i>'I regularly walk my dog in this area (particularly Blackwood Farm). It is has a rich diversity of wild flowers and old trees and variety of wild animals including birds of prey such as honey buzzards and rare birds such as wood warblers.'</i></p> <p>ANON-VUXE-WEZ9-Q <i>'The song of the Skylark rises above other sounds and is really calming. The area retains a feeling of being natural and full of life.'</i></p> <p>ANON-VUXE-WESY-G <i>'Home to historic hop growing and farming.'</i></p> <p>ANON-VUXE-WEC6-W <i>'The farmlands were hops field which provides the history of the area development. I love looking to the hills and breathing the clean fresh air and thinking about the history of the place.'</i></p>	
The proposed extension does not meet the Natural Beauty Criterion	<p>ANON-VUXE-W5T8-Z, ANON-VUXE-WEDX-Z and ANON-VUXE-WMWH-B considered the area to not meet the Natural Beauty Criterion, although no justification was given.</p> <p>ANON-VUXE-WS1T-Q considered the margins of the area do not warrant designation and that the boundary has not been drawn conservatively.</p>	<p>Commentary</p> <p>Natural England does not agree that the proposed Extension Area lacks natural beauty.</p> <p>Natural England acknowledges that there is a difference in the extent of the Candidate Area following the Natural Beauty Assessment and the proposed boundary which lies further to the north in the area of Wildfield Copse. Natural England Guidance usually seeks to define a boundary within a Candidate Area. However, at Wildfield Copse during the boundary setting stage, the area was reviewed, and in this instance, it resulted in the boundary being defined further to the north beyond the Candidate Area. Natural England does not regard this as</p>

Natural Beauty		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
		a discrepancy and has sought to provide an explanation for these judgements below in relation to Exclude land at Wildfield Copse.

Boundary		
Theme	Representations	Natural England Commentary
General agreement with proposed boundary	<p>A significant number of respondents agreed with the proposed boundary simply answering yes on the survey form while some provided reasons for their view. Examples include:</p> <p>ANON-VUXE-WSK2-F (Guildford Borough Council) <i>'GBC also agrees that the proposed boundaries for extending the AONB are logical and adhere to the principles for setting an AONB boundary. Whilst GBC provides high level support for the process and findings, it acknowledges that other stakeholders and residents will have more detailed views based on their in-depth local knowledge. It therefore requests that Natural England carefully considers any comments that are made by any of its residents in determining whether any variations to the proposed boundary are justified, including whether further areas meet the criteria for inclusion within the AONB.'</i></p> <p>ANON-VUXE-WSRX-V <i>'[Anon] fully supports Natural England's proposed boundary change, as shown in map ref: Fig 14 (the Hogs Back)'</i></p> <p>ANON-VUXE-W5XB-E <i>'It is clear that a very good assessment has been made in order to arrive at a sensible and achievable designated area.'</i></p> <p>ANON-VUXE-WE9B-Y <i>'It seems a reasonable boundary, considering the studies done to extend the AONB.'</i></p> <p>ANON-VUXE-WE5J-3 <i>'We consider that White Lane forms an appropriate, clearly defined and defensible western boundary for the AONB extension area. We agree that the qualities of the landscape are transitional moving away from the Hogs Back and less reflective of the Special Qualities of the</i></p>	<p>Commentary</p> <p>Natural England notes the support for the proposed boundary and has provided a detailed commentary to the boundary issues raised by other respondents, which can be found below.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p>AONB. Land west of White Lane is more influenced by the adjacent urban areas, is less tranquil, contains no historic tracks/lanes and few features of heritage or cultural importance; overall, it is considered to be of lesser quality than the landscape east of White Lane.'</p> <p>ANON-VUXE-WM6Y-U 'The extension north stops at the edge of urbanised areas and smaller groups of housing, which is entirely logical.'</p> <p>ANON-VUXE-WEP7-B 'Takes account of natural boundaries in the landscape rather than other influences and as such needs the test of AONB by reference to other local AONB and maintains consistency.'</p> <p>ANON-VUXE-WE92-F 'Logical given roads and properties.'</p> <p>ANON-VUXE-WEZS-H 'the area proposed represents a good compromise.'</p>	
Request for Additional Areas		
Inclusion of additional land west of White Lane to The Street and north of Poyle Road	<p>A significant number of respondents requested additional land to the west of White Lane to The Street and north of Poyle Road including:</p> <p>ANON-VUXE-W5UR-U (Surrey County Council), ANON-VUXE-WE2P-6, ANON-VUXE-WSRC-7, ANON-VUXE-WEVJ-4 and ANON-VUXE-WS1U-R, ANON-VUXE-WENZ-C, ANON-VUXE-WEV7-H, ANON-VUXE-W5XV-2, ANON-VUXE-WEC6-W, ANON-VUXE-WEGP-U, ANON-VUXE-WMR7-N, ANON-VUXE-WECY-Z, ANON-VUXE-WECS-T, ANON-VUXE-WE83-F, ANON-VUXE-WEB2-R, ANON-VUXE-WEPQ-5, ANON-VUXE-</p>	<p>Commentary</p> <p>Importance of Past Assessments Natural England is aware of past assessments in this area including the review of Guildford Borough Council Local Plan 2015-2034, a Greenbelt and Countryside Study. Whilst informative, this sensitivity assessment does not equate to evaluating landscape for national designation.</p> <p>Extent to which Natural Beauty Criterion is met</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p>WEEW-Z, ANON-VUXE-WEGK-P, ANON-VUXE-WEC6-W, ANON-VUXE-WEMR-3, ANON-VUXE-W5UA-A</p> <p>Reason given include:</p> <p>Natural Beauty</p> <ul style="list-style-type: none"> • Beautiful part of England's green and pleasant land • Amazing flora and fauna of the area...the wildflower meadows which are such an important source of nectar for the endangered bees ...the families of deer which are visible most days...the Red Kites which soar effortlessly above the meadows...the hares and rabbits. • The quality of the landscape has already been assessed numerous times of being of high value. • AGLV • Open landscape that is scenically equivalent to, if not better than the areas that form part of the current AONB and EA2 candidate areas. • High landscape quality with strong distinctive characteristics • No discernible difference in landscape character and quality between the land west of White Lane (not proposed for inclusion) and the land east of it (proposed for inclusion). • Similarity between this AONB farmland and the farmland further north. • Incredible natural beauty, historic and cultural significance and local accessibility. • Rising land, which commands magnificent views. • The existing low-density housing which backs on to this farmland is low-key, with boundary screening by established vegetation. 	<p>It is acknowledged that the land between the existing AONB and Poyle Road is an Area of Great Landscape Value (AGLV) and that the HDA study found that land south of Poyle Farm qualified for designation. Nevertheless, these areas have been reviewed as part of the larger boundary review assessment process and in line with Natural England Guidance.</p> <p>Natural England acknowledges that there are attractive views from the urban edge of Poyle and that this land acts as an important rural setting to the settlement, supports various fauna including deer and birds of prey which are evident in the wider area also, has heritage interest including the brewery and hops growing as well as WWII heritage features. Nevertheless, the Natural Beauty Assessment Report found that the condition and scenic qualities were transitional and, in some areas, not sufficiently high to warrant designation as a national landscape. The influence of the urban edge is evident closer to Tongham along with commercial activity and recreational land uses. The loss of field boundaries and changing land uses such as hops growing and conversion of parkland to arable has created a more visually fragmented landscape such that scenic quality is lower than further to the east. In addition, the Hogs Back is declining in elevation as it moves west, becoming lower and also narrower as indicated in the Surrey Landscape Character Assessment – as such it is a less distinct feature than in the east.</p> <p>The Natural Beauty Assessment Report identified that this land was an area of transitional landscape where landscape quality and condition were declining to the west. West of White Lane the Natural Beauty Assessment Report acknowledged the contribution of remnant parkland associated with Poyle Park (page 46).</p> <p>North of Poyle Road Natural England acknowledges that there are areas of land which are valued for their nature conservation including Cardinals Meadow Site of Nature Conservation Importance (SNCI)</p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> The majority of existing settlement along the Tongham boundary has limited visual influence on the candidate area as its low density and well-screened. Guildford Borough Council Local Plan 2015-2034, a Greenbelt and Countryside Study defined land west of White Lane as High Sensitivity (K3 and K5) whereas land proposed for designation was classified as Medium Sensitivity (H19). There is no degradation in the visual quality of the rural farmland landscape until the clearly defined settlement of Tongham is reached. Developments in the immediate vicinity of the proposed extended area are largely screened by trees / foliage which maintains the natural beauty of this area. St Pauls Church, Tongham is a Victorian Church at the foot of the hill with a broken chalk stone finish (Clunch) and associated churchyard. Superb landscape and scenic quality views from St Paul's Church graveyard in Tongham. View to the south of the church is very restful and tranquil and highly valued by the residents of Tongham whose relatives are buried here. Western and northern approach to the Hogs Back Ridge are naturally beautiful and provide unspoilt views of the ridge itself. Outstanding views to the adjacent countryside. The view [from Tongham] is now the last wonderful sight in Tongham. Peace and quiet of Tongham, and the view across the fields from the lovely Hogs Back Brewery and taphouse is also outstanding. Beautiful and historic stretch of farmland and green space can be protected along the length of the Hogs Back. 	<p>and a wider area of grasslands which make up the Ash Green Meadows Suitable Alternative Natural Greenspace (SANG). This area includes former parkland with a number of veteran oaks set within grassland. However, the location of these meadows close to the urban edge, noise intrusion from traffic, large-scale barns and equestrian uses at Poyle Farm, collectively affect the quality of the area. These fields form attractive countryside but lack qualities which mark them out as nationally outstanding. For these reasons they are not included within the proposed Extension Area.</p> <p>Immediately south of Tongham the urban edge is more open and abrupt. The open arable fields to the south afford views to the built edge and wider development in the Tongham and Farnham area. Further west hops growing associated with the Hogs Back Brewery is visible. This is acknowledged as a traditional landuse associated with the wider Farnham area which was once much more widespread. The Hogs Back Brewery has a poorly defined edge and is associated with a new reservoir and this visual clutter, along with views to the hotel and service station to the south, add to increased visual fragmentation and urban fringe character. The church at Tongham is not a clear feature, when seen from the surrounding landscape, and makes only a localised contribution to the qualities of the area. The noise of the A321 and A331 is noticeable and undermines perceptions of tranquillity.</p> <p>Natural England also acknowledges the comment made by respondent ANON-VUXE-WE5J-3 which noted that the Hankinson Duckett Associates (HDA) study although identifying land for designation as AONB, excluded land in the west (Tongham area) and far east (close to Guildford). Natural England agrees that page 42 of the Natural Beauty Assessment Report should be amended to clarify that the HDA study did not recommend designation of AGLV land in the far east and west.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> Landscape and habitat is identical to the areas proposed and also existing in the Wanborough area already designated AONB status having the same topography and geology. Relative wildness around Tongham is higher than the area south and southeast of Ash Green. Area is further from A31 and A331 (Blackwater Valley Road) than the existing AONB and therefore more tranquil benefiting from distance and the amount of sound deadening vegetation / advantageous topography. Churchyard at St Pauls, Tongham which is noted for its tranquillity, both in terms of lack of intrusive noise as well as restful pastoral views. The irrigation ponds just east of the Hogs Back Brewery are important for nature. Sightings of birds of prey, including Harriers and Red Kite Elements of Poyle Park remain with some features of the deer park remaining. Remains of two pillboxes in the area next to the Hop Garden ponds and a third pillbox has been incorporated into the Hogs Back Brewery at the proposed alteration boundary edge. Hops that are grown east of the brewery and south of St Pauls Church are Farnham White Bine hops. This type of hop was traditionally grown around Farnham however it was almost "lost" in this area due to disease and competition from imports and other commercial varieties grown elsewhere. Evidence of traditional hops industry is visible in the centre of Tongham and at the Hogs Back Brewery - the hop garden is one of only two gardens left in Surrey. The area contains features of heritage interest, including Poyle Park, Ancient Woodland and numerous mature oaks across the area which supports habitats for a wide variety of wildlife. 	<p>The use of White Lane as a boundary is considered to be an easily identifiable feature within this transitional landscape in accordance with Natural England Guidance which states that in transitional areas <i>'the boundary should not be expected to be a sharp barrier between areas of differing quality'</i>. Because the boundary is drawn within a transition and rarely landscape changes abruptly, it is not unusual for a boundary to appear to cut across land that appears the same either side. However, when considered in relation to the assessment of the wider tract, there is a rationale to the identification of the selected boundary.</p> <p><u>Protection of area from Development</u></p> <p>Natural England acknowledges the strength of local feeling associated with this area and the concerns of local people who feel that the valued qualities of the area may be lost to future development. However, in accordance with Natural England Guidance, land to be designated as AONB must first meet the Natural Beauty Criterion. The pressure of development on a landscape is not a justification for designation if the land itself does not qualify.</p> <p>The proposed extension on the northside of the Hogs Back will enable both sides of this topographic feature, which meet the Natural Beauty Criterion, to be conserved and enhanced. While the land in question does topographically form the lower slopes of the Hogs Back, this is not a justification for including land which does not overall meet the Natural Beauty Criterion. This approach is consistent with decisions made elsewhere including south of the A31 in the Runfold area, as well as in the wider Surrey Hills AONB Boundary Review.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> There are historical paths crossing the area that have been in place since before 1873. There are no areas of leisure plots and ad hoc development in the proposed extended area, hence there is no fragmentation of the landscape patterns which are unchanged (other than changes to field borders) since 1873. Significantly, more than 50% of the current AONB boundary in the proposed extended area has no defined boundary per the criteria clearly laid out in the Consultation Report. Hence, acceptance of the above provides an opportunity to establish clearly defined boundaries across the entirety of the northern edge of the Hog's Back AONB. <p>Desirability</p> <ul style="list-style-type: none"> Designation would assist this objective of conserving and enhancing the Hog's Back ensuring both sides of the Hogs Back ridge are protected and a consistently protected area towards the Farnham end of the A31. There is a strong desirability case for inclusion to align with the objectives of including the land east of White Lane within the extended AONB. Sensitivity of area to development - many of the fields to the west toward Farnham have now been lost. It really needs AONB protection for the village and for Countryside management. If the area is not designated as an AONB it would leave the door open to developments such as housing estates with relevant roads and infrastructure. Last bit of greenery left that sits between the village and the A31 Hogs Back - without protection it will be houses within a matter of time. 	<p>Any land north of the AONB boundary will fall within the setting of the AONB and be subject to policy set out in National Planning Policy Framework (December 2023) para 182.</p> <p><u>Access and wellbeing and nature networks</u></p> <p>The opportunity to provide access on the edge of urban areas and of increasing nature networks, can and often is, a focus of work within an AONB once it is designated. However, these important goals are not a justification for designating land which does not meet the Natural Beauty Criterion. This reflects the sequential approach set out in Natural England Guidance that land must first demonstrate sufficient natural beauty before consideration is given to desirability.</p> <p><u>Boundary</u></p> <p>Natural England accepts that there are boundary anomalies associated with the existing AONB boundary in the Tongham area. These anomalies were noted in the Natural Beauty Assessment Report (page 52) but were inadvertently missed from the Boundary Considerations Report.</p> <p>Natural England has therefore undertaken a review of these areas and proposed minor changes to the boundary within the transitional area, identifying a clear feature on the ground. Natural England does not consider this is a reason for including a much larger area of lesser-qualifying land. In addition, when addressing the boundary anomalies, Natural England has reviewed how the boundary is defined at Tongham compared to the Flexford and Blackwell Farm areas and has concluded there is no inconsistency of approach given the nature of the urban edge and land uses, as noted above.</p> <p>In extending the boundary to follow clear features, Natural England proposes to include the remnant parkland of Poyle Park and ancient woodland to the west. In the east, adjacent to White Lane the boundary is drawn as far south as Poyle Lane due to a lack of</p>

Boundary		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<ul style="list-style-type: none"> This area is used for walking and recreation for residents of Tongham and surrounding areas and is an easily accessible haven of peace in the growing urban sprawl to the north of this area. It would extend the wildlife corridor and increase diversity. Wellbeing of the inhabitants that use the open space for recreational purposes should be taken into consideration. The areas suggested to be included in the extension would link towards the now estimated Tice.s Meadow Nature Reserve. <p>Proposed Boundary A number of boundary options were submitted by respondents. Most followed the settlement edge as defined in the Guildford Local Plan. Some excluded the commercial development associated with the brewery, while others included this development within the proposed boundary. Some used Poyle Lane as the northern boundary while others extended further north as far as the dismantled railway. Many identified the general area without defining a detailed boundary.</p> <p>Some suggested minor boundary refinements to address anomalies where the current AONB does not follow a clear feature on the ground.</p> <p>ANON-VUXE-W5UR-U (Surrey County Council) raised concern that there is an inconsistency in the AONB boundary proposed adjacent to the Blackwell Farm site allocation and the settlement at Flexford, compared to adjacent to the existing settlement boundary of Tongham.</p>	<p>boundary features, excluding properties along the lane. Further west the boundary extends as far north as a hedgerow to the south of properties along Poyle Lane, and then heads southwest along hedgerows and the edge of woodland. It also follows the track leading to the Hogs Back Brewery before heading south in a straight line to join the corner of the reservoir, and then west in a straight line to join the edge of property boundaries along The Street. From here it heads south along property boundaries before turning east along the access road to the A31, and joining the existing AONB.</p> <p>Natural England acknowledge that, in addressing the boundary anomalies in this area where the existing AONB does not follow any clear features, it has been necessary to include a number of fields of lesser quality land. In addition, around the Hogs Back Brewery it has been necessary to take the boundary in a straight line between features, given the edge of the built-up area is not clearly defined.</p> <p>Conclusion Addition of land within the zone of transition at Tongham in order to identify clear features on the ground and address existing AONB boundary anomalies.</p> <p>(Addition 1 – Refer to Figure 14a)</p>
Second (2024) statutory consultation:	68 respondents agreed with the designation of Addition 1, some providing reasons for their views as follows:	<u>Commentary</u>

Boundary		
Theme	Representations	Natural England Commentary
Support for proposed Addition 1	<p>ANON-PQ5Q-KR3G-X (Guildford Borough Council) <i>'GBC is pleased that Natural England has taken another positive step forward in the process of reviewing the Surrey Hills AONB boundary. GBC considers that the work undertaken by Natural England and its highly qualified consultant team has been professional and the consultation processes open and inclusive. For these reasons, it supports the outcome of the proposed amendments to the boundary extensions. GBC agrees with the accompanying assessment that the quality of the three newly proposed areas is of sufficient natural beauty to be included in the AONB....'</i></p> <p><i>...GBC also agrees that the proposed boundaries for extending the AONB are logical and adhere to the principles for setting an AONB boundary. Whilst GBC provides high level support for the process and findings, it acknowledge that other stakeholders and residents will have more detailed views based on their in-depth local knowledge. It therefore requests that Natural England carefully considers any comments that are made by any of its residents on the proposed amendments to the boundary extensions.'</i></p> <p>ANON-PQ5Q-KR87-K <i>'...enhance the lives of the inhabitants of this area. This should be protected as it is home to diverse plants and species including slow worms, many of which are decreasing in numbers due to this local development.'</i></p> <p>ANON-PQ5Q-KRSD-U <i>'There is so much nature and wildlife that needs protecting, not to mention protections the trees afford to the environment.'</i></p>	<p>Natural England acknowledges the reasons given by respondents in support for this proposed addition.</p> <p>Although 3 respondents disagreed with the designation of this Addition, only 1 provided a reason for their view and this is dealt with below.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>Future generations should be able to enjoy the beauty and nature within Tongham. Protect it's history and reduce the impact of over development.'</i></p> <p>ANON-PQ5Q-KRZK-9 <i>'Tongham is a village which is rapidly expanding. People living their [there] in the future need to retain some of the natural beauty of Surrey which could be in danger of being list [lost].'</i></p> <p>ANON-PQ5Q-KRPP-4 <i>'This section of land encompasses part of The Christmas Pie Trail and my view is that this popular walking and cycling trail, that runs from Farnham to Guildford, should be included in the proposals'.</i></p> <p>ANON-PQ5Q-KRT3-B <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 assets are affected. These include Poyle Park at Tongham....</i></p> <p>A number of respondents supported the proposed addition but did not provide any reason for their view including: ANON-PQ5Q-KR43-B, ANON-PQ5Q-KRA6-U, ANON-PQ5Q-KRAD-9, ANON-PQ5Q-KRPR-6, BHLF-PQ5Q-KRT1-9, BHLF-PQ5Q-KRT4-C, BHLF-PQ5Q-KRTC-U, BHLF-PQ5Q-KRTP-8, BHLF-PQ5Q-KRTR-A</p>	

Boundary		
Theme	Representations	Natural England Commentary
Support Addition 1 but wish to comment on the boundary to include more land	<p>3 respondents wished to comment on the boundary and one respondent, who agreed with the designation of Addition 1, also suggested a change to the boundary bringing the total to 4 as follows:</p> <p>ANON-PQ5Q-KR8V-J (Surrey County Council) Reasons given include:</p> <ul style="list-style-type: none"> ‘we do not consider there to be a dramatic difference in landscape condition and scenic qualities between the land immediately south of Tongham and the land further south which is proposed for inclusion in the AONB.’ ‘We do not consider hop growing to be a visual detractor within this varied agricultural landscape.’ ‘The AONB boundary is drawn right up to the settlement of Flexford, but not Tongham, although the actual appearance of both settlement edges i.e. low-rise, low-density housing with well-vegetated boundaries is extremely similar.’ ‘There is also a visual relationship with the northern slopes of the Hog’s Back, all the way from Tongham looking south/south-east.’ ‘Acknowledge tranquillity at Tongham is considered lower due to road noise.’ <p>Proposed alternative boundary</p> <p>‘We suggest that drawing the AONB up to the Tongham settlement boundary would be desirable in order to provide a more defensible boundary than the somewhat complicated hedgerow field boundaries further south currently being proposed. This would still provide uninterrupted views across undeveloped farmland right up to the Hog’s Back ridgeline and would not include any urban development within the revised AONB.’</p>	<p>Commentary</p> <p>Natural England notes that a number of responses, whilst agreeing with the proposed addition, also wanted more land included. A variety of boundaries were proposed, including land up to the urban edge of Tongham, as well as a wider area to include the settlement of Tongham and Flexford.</p> <p>Natural England acknowledges that a key reason respondents have requested the inclusion of land immediately south of Tongham is their perception that it is similar to the land proposed for inclusion further south. This is not unusual in areas of transition (as concluded in the Natural Beauty Assessment, page 51). Appendix 4 of Natural England Guidance makes it clear that <i>‘the boundary should not be expected to be a sharp barrier between areas of different quality...the boundary should be drawn towards the high-quality end of the transition..’</i></p> <p>Pages 10 to 15 above set out the reasons for proposed Addition 1 at Tongham. The reason land to the south of Tongham was proposed for inclusion was to address a boundary anomaly.</p> <p>Natural England does not accept that the effect of the urban edge of Tongham is the same as Flexford. Page 12 above states that <i>‘the open arable fields to the south afford views to the built edge and wider development in the Tongham and Farnham area’</i> and goes on to state that the edge is poorly defined showing signs of visual clutter and other urbanising influences. These issues are not comparable in the Flexford area.</p> <p>Natural England notes the importance of addressing matters to do with rainfall, soil erosion and flooding. Whilst they may be issues which are considered to add to the desirability of designating this land, Natural England Guidance is clear (para 8.12) that land must first meet the Natural Beauty Criterion.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p>ANON-PQ5Q-KRJD-J Reasons given include:</p> <ul style="list-style-type: none"> • Protection of established settlements without destroying the infrastructure already sensitively implemented • Heavy rainfall and change in climate - the current landscape absorbs the excessive rainfall. If this land is not protected with the extended AONB boundary line then the settlement will become destroyed through flooding, soil erosion. <p><i>Proposed alternative boundary</i></p> <p><i>'The AONB boundary line needs to be extended to at a minimum to Poyle Road or to the railway line of Ash.'</i></p> <p>ANON-PQ5Q-KRSN-5 Reasons given include:</p> <ul style="list-style-type: none"> • Area covered by AGLV • Area blends seamlessly into the existing AONB as rolling fields and hillside of the Hogs Back • No physical borders or boundaries between the two designated areas • Area is not fragmented or transitional. <p><i>Proposed alternative boundary</i></p> <p>To include land north of the existing boundary towards the edge of agricultural land bordering Poyle Road i.e. including all land west of White Lane.</p> <p>ANON-PQ5Q-KRSS-A Reasons given include:</p>	<p><u>Conclusion</u> Natural England remains of the view that land south of Tongham does not meet the Natural Beauty Criterion for the reasons given in the Natural Beauty Assessment Report and the Statutory Consultation Analysis Report, Appendix 4. However, Natural England does accept that the amended boundary, which seeks to address the existing AONB anomaly, results in the inclusion of lesser quality land. This is addressed further in the section immediately below.</p>

Boundary		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<ul style="list-style-type: none"> • <i>'boundary seems..totally adverse to your own criteria</i> • <i>incomprehensible that a field should be split in two</i> • <i>all of a similar appearance</i> • <i>process is overwhelming and we are fighting for common sense'</i> <p>Proposed alternative boundary</p> <p><i>'Simple logic to take the boundary of the extension as far as The Street, Tongham in the west, and Poyle Road in the north. This is the natural boundary of the area.'</i></p>	
Object to proposed Addition 1	<p>ANON-PQ5Q-KRRT-A Reasons include:</p> <ul style="list-style-type: none"> • <i>'Four previous studies all acknowledge that the land in the western part of Addition 1 does not meet the natural beauty criterion.</i> • <i>There is an absence of evidence justifying desirability of including the area</i> • <i>The approach to addressing boundary anomalies is inconsistent - there are other areas where the boundary has not been adjusted to address an anomaly.</i> • <i>The proposed boundary is weak because it too does not follow a defined permanent feature and is little different from the existing. (It does not address a further anomaly to the south where it crosses the A31, the proposed new alignment extends in a straight line between two features, and it follows a track which is not necessarily permanent.</i> • <i>The current AONB boundary whilst not following a clear feature nevertheless has a clear spatial relationship with the Hogs Back and includes the higher quality upper slopes</i> • <i>The land in the west of Addition 1 does not meet the natural beauty criterion for the following reasons:</i> 	<p><u>Commentary</u></p> <p>Natural England has reviewed this area in light of response ANON-PQ5Q-KRRT-A but also respondents who requested the inclusion of more land (see above).</p> <p>Natural England accepts that land south of Tongham was identified in the Natural Beauty Assessment as not meeting the Natural Beauty Criterion. It also notes that a review of the boundary following the First (2023) statutory consultation, identified land to the east within the zone of transition which contained features of interest including Poyle Park and ancient woodland which was considered suitable for inclusion, and where the boundary could follow clear features on the ground.</p> <p>However, immediately south of Tongham, the reason for extending the boundary related specifically to addressing an anomaly with the existing AONB boundary. Natural England accepts that in addressing the boundary anomaly in this location, it has included some lesser quality land.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> <i>HDA assessment 2013 did not propose the area for designation due to 'urban influence increase in places'</i> <i>Natural Beauty Assessment by respondent 2022 concluded land was neither 'outstanding or nationally significant'</i> <i>Natural Beauty Assessment Technica [Technical] Report as part of Boundary Review 2023 concluded land west of White Lane is excluded due to 'lack of woodland management, intensive agriculture and development associated with Tongham, Ash Green and Flexford...'</i> <p><i>Consultation Analysis Report 2024 noted decline in natural beauty qualities towards the western end of the area. Detracting features/characteristics identified by Natural England in this area include: the open and abrupt urban edge of Tongham, poorly defined edge and visual clutter [clutter] associated with the Hogs Back Brewery, views to the hotel and service station which add to the visual fragmentation and urban fringe character, noise of the A321 and A331 which undermine perceptions of tranquillity.'</i></p>	<p>To maintain consistency with the approach adopted elsewhere in the boundary review, Natural England agrees that where the existing AONB boundary does not follow a clear feature on the ground, and land beyond does not qualify, then anomalies are left unresolved.</p> <p>On this basis, Natural England proposes to amend the boundary, bringing it back to the existing AONB in this area. The boundary of the proposed addition is also amended and drawn back to the east as far as woodland north of the hotel. It follows clear features on the ground comprising hedgerows and the edge of woodland, before joining the existing AONB boundary.</p> <p>Conclusion Minor deletion to exclude non-qualifying land in the west and ensure consistency and compliance with Natural England Guidance (refer to Figure 14c – Deletion 14).</p>
Include land east of Ash Green, including Week Wood and Highfield Copse	<p>ANON-VUXE-WEGB-D requested the inclusion of the land to the east of Ash Green up to Ash Green Lane East. No specific reasons were given but reference was made to small scale meadows and pastures and historic routes.</p> <p>ANON-VUXE-WEZH-6 requested the inclusion of Week Wood and Highfield Copse to the north of Green Lane East. Reasons include:</p> <ul style="list-style-type: none"> There are animal tracks/wildlife corridors linking Wanborough woods to Week Woods and Highfield Copse Vital for species protection, this in turn is vital for maintaining the beauty of the area. Our outstanding flora and fauna need all the help they can get to keep our countryside thriving and beautiful. 	<p>Commentary</p> <p>The Natural Beauty Assessment Report noted at page 45 the historic routes traversing east-west including Green Lane East and that they have a long-established character. It also noted areas of ancient woodland between Ash Green and Flexford.</p> <p>On page 43 the assessment sets out that there are areas where small scale paddocks and storage areas can create visual clutter. It concludes that the landscape is traditional as it moves away from the Hog's Back and where it is influenced by settlement fringes and on page 51 under fragmentation that '<i>Urban fringes on the margins of settlement within and around woodland areas has caused some</i></p>

Boundary		
Theme	Representations	Natural England Commentary
		<p><i>fragmentation and will require particular scrutiny at the boundary setting stage e.g. along Ash Green Lane East.'</i></p> <p>The Boundary Considerations Report states on page 13 that <i>'Between Ash Green and Flexford, the boundary was drawn around the most intact areas of woodland/farmland that formed part of the sweep of lower slopes adjacent to the Hog's Back, excluding areas which had become fragmented by ad hoc development and urban fringe land uses.'</i></p> <p>This area was reviewed. The land to the north of the proposed boundary continues to fall in a northerly direction and small holdings, paddocks and development associated with Rickwood Farm and Pound Farm, along with overhead transmission lines across open pastures cause fragmentation. Although the area contains positive features such as Green Lane East, the more incised watercourse which passes through Kiln Copse and the distinctive coppice stools of Highfield Copse, overall, the area lacks the qualities of land to the south.</p> <p><u>Conclusion</u> No change.</p>
Inclusion of settlements of Tongham and Ash Green	<p>ANON-VUXE-W5XT-Z and ANON-VUXE-WEGB-D requested the inclusion of the settlements of Tongham and Ash Green.</p> <p>Reason given include:</p> <ul style="list-style-type: none"> • Well used and appreciated areas of beauty. • The dismantled railway line, farms and hills are a wonderful example of the diverse areas of countryside and heritage. • Should be given protection. • Small villages are being squeezed with more and more housing being built every year. 	<p><u>Commentary</u></p> <p>Natural England Guidance is clear that settlements on the margins must be considered on their merits and must lie within qualifying land (Appendix 4 of Natural England Guidance).</p> <p>Both Tongham and Ash Green lie at the margins of the qualifying area and the land between them and the AONB is noted as transitional. The Natural Beauty Assessment Report noted (page 51), that the settlements of Tongham and Ash Green <i>'have been excluded in their entirety due to the character and nature of these</i></p>

Boundary		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<ul style="list-style-type: none"> At risk of losing the countryside and green space that help make our small villages so important to so many lives. Other more exclusive and affluent areas, built up villages are being included in the AONB. 	<p><i>settlements, extent of modern development and because they are not surrounded by qualifying land.'</i></p> <p>Natural England acknowledges the strength of local feeling associated with this area and the concerns of local people who feel that the valued qualities of the area may be lost to future development. However, in accordance with Natural England Guidance, land to be designated as AONB must first meet the Natural Beauty Criterion. The pressure of development on a landscape is not a justification for designation, if the land itself does not qualify.</p> <p>Natural England acknowledges that other areas of settlement have been included within the proposed extension areas. In each instance, these areas have been assessed on their individual merits by considering their particular character and qualities and their relationship to the adjoining landscape (as set out in Natural England Guidance).</p> <p>Natural England maintains the view that the settlements at Tongham and Ash green should be excluded.</p> <p><u>Conclusion</u> No change.</p>
Include land north of the railway	<p>ANON-VUXE-WEZ9-Q requested the inclusion of land north of the railway.</p> <p>Reasons given include:</p> <ul style="list-style-type: none"> It would be "cleaner" to include the land between Flexford and the School House south of the railway line. On the north side of the railway the footpaths south of East Wyke Farm and east of Pound Farm Lane afford lovely views, notably towards Guildford Cathedral. 	<p><u>Commentary</u></p> <p>Natural England acknowledges that in places the land north of the railway is more open and rises slightly such that it affords some views southward towards the Hog's Back. This area was assessed as part of EA2b which noted that variations in topography could afford some longer distant views, but it also noted that these qualities were not widely expressed and these areas were frequently separated by</p>

Boundary		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<ul style="list-style-type: none"> The landscape is open and sweeping. I can see there could be a problem with the AONB being a bit fragmented. 	<p>lesser quality land (page 48 of the Natural Beauty Assessment Report).</p> <p>Natural England agrees that these areas are fragmented and do not form a tract of qualifying land and remains of the view that the boundary should not be drawn to include land north of the railway.</p> <p><u>Conclusion</u> No change.</p>
Include land east of Flexford	<p>ANON-VUXE-WEM1-2 requested inclusion of land east of Flexford</p> <p>Reasons include:</p> <ul style="list-style-type: none"> Spring streams and ponds to the west side of Flexford Road as it turns north towards Chimney Farm and the railway line – they are a distinctive part of the character and landscape of Flexford. They also provide visible evidence of the local environment that fostered development of the medieval flax industry in this area which gave the village its name: "Flaxford", later "Flexford". 	<p><u>Commentary</u></p> <p>Natural England acknowledges the presence of a minor watercourse along the track leading to Chimney Farm and the cultural association of the medieval flax industry in this area. Natural England also notes the presence of the Little Flexford Site of Nature Conservation Importance. Nevertheless, Natural England remains of the view that within the transitional landscape, the boundary should be drawn further to the south. Natural England has reviewed the boundary definition in this area and has concluded that West Flexford Road would make a more robust boundary within the transition, excluding more recent housing on the edge of the settlement, whilst still including West Flexford House, listed building, and its farm buildings.</p> <p><u>Conclusion</u> Minor deletion to exclude more modern housing on edge of Flexford.</p> <p>(Deletion 3 – Refer to Figure 14a)</p>

Boundary		
Theme	Representations	Natural England Commentary
Support for proposed Deletion 3	<p>Of the 35 responses received for this area, 22 supported the proposed deletion, only one provided a reason for their view, as follows:</p> <p>ANON-PQ5Q-KR3G-X (Guildford Borough Council) <i>'GBC is pleased that Natural England has taken another positive step forward in the process of reviewing the Surrey Hills AONB boundary.</i></p> <p><i>GBC considers that the work undertaken by Natural England and its highly qualified consultant team has been professional and the consultation processes open and inclusive. For these reasons, it supports the outcome of the proposed amendments to the boundary extensions..... GBC also agrees with the reasons given to delete the two small previously proposed areas.</i></p> <p><i>GBC also agrees that the proposed boundaries for extending the AONB are logical and adhere to the principles for setting an AONB boundary. Whilst GBC provides high level support for the process and findings, it acknowledges that other stakeholders and residents will have more detailed views based on their in-depth local knowledge. It therefore requests that Natural England carefully considers any comments that are made by any of its residents on the proposed amendments to the boundary extensions.</i></p> <p><i>GBC looks forward to continuing to work with and support Natural England in concluding this review process as swiftly as possible.'</i></p>	<p><u>Commentary</u></p> <p>Natural England acknowledges the support for this deletion but also notes that some respondents objected to Deletion 3 and this is considered below.</p>
Object to proposed Deletion 3	<p>Of the 43 responses received for this area, 2 respondents provided a reason for their view, objecting to the deletion:</p> <p>ANON-PQ5Q-KRRB-R <i>'I am very disappointed that in response to a suggestion that the boundary should be extended in this area you have instead pulled it back. It makes me nervous about returning to the charge.</i></p>	<p><u>Commentary</u></p> <p>The reasons for the exclusion of modern housing on the edge of Flexford are set out on pages 24-25 above.</p> <p>West Flexford Lane provides a clear boundary enabling the exclusion of a cluster of modern houses and the hedgerow. The adoption of</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>The new boundary you have proposed is bizarre in that, in order to include West Flexford House, you have given it a sharp kink through private land before it rejoins West Flexford Road. This is in no way a 'robust boundary'.</i></p> <p>Proposed Boundary</p> <p><i>I suggest it would make far more sense either to stick to the original proposal or, better, to extend the boundary along Flexford Road towards Chimney Farm and then to follow the railway line eastwards as far as Wildfields Farm, where it would rejoin the existing boundary. The entirety of this additional area is agricultural farmland with views up to the Hog's Back, apart from the very minor settlement to the north of West Flexford Road, which seems to be the reason why you have changed your original proposal.</i></p> <p><i>This might seem like a small thing, but the importance of giving the open land between Guildford and Flexford the maximum possible level of protection is all too evident in the recent decision of the GBC Planning Committee to allow the University of Surrey to install a solar farm on 21.7 hectares of agricultural land to the west of Blackwell Farm, including in one field (Little Misley) that is recommended for inclusion in the National Landscape as part of your proposals. It is really important to halt this westward encroachment into the Green Belt and National Landscape in order to protect it for future generations, and your proposals are the most effective means of securing this.</i></p> <p><i>Thank you for considering this suggestion.'</i></p> <p>ANON-PQ5Q-KRRX-E</p> <p><i>'There would be a strong preference to extend rather than delete the boundary on the western side of D3 along Flexford Road towards the railway line and use this as a definitive boundary along the north to</i></p>	<p>the hedgerow and post and rail fencing around West Flexford House enables the listed property (which contributes to natural beauty) to be included as a feature of interest on the edge.</p> <p>The reasons why the boundary does not follow the railway to the north are set out in the Boundary Considerations Report page 13-14.</p> <p>Natural England Guidance is clear that '<i>land should not be included merely to seek to protect it from specific development proposals</i>' (Appendix 4).</p> <p>Natural England notes that respondent ANON-PQ5Q-KRRB-R raises the issue of the recent planning permission for a solar farm in the vicinity of Wildfield Copse, within the area proposed for designation further to the east. Natural England's response to the approved planning permission for a solar farm in this location can be found on pages 31-32 below.</p> <p>Conclusion</p> <p>No change.</p>

Boundary		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<p><i>include Backside Common and then rejoin the existing boundary at Wildfields Farm.</i></p> <p><i>This would help to preserve agricultural fields with views towards the Hog's Back which include well used walking routes between Wood Street Village and Flexford as well as Backside Common. I am keen to preserve as much as possible the openness of the area which hitherto has not suffered from unwelcome infilling or encroachment.'</i></p>	
<p>Include Backside Common south of the Railway Line as far as Wildfields Farm</p>	<p>ANON-VUXE-WEV7-H This would be for reasons of consistency, as well as the fact that Backside Common is part of a local wildlife site (SNCI) for its nature conservation/biodiversity/ecological importance in a strategic/county context.</p> <p>ANON-VUXE-WEMD-N requested the inclusion of Backside and Broadstreet Commons SNCI and referenced the importance of these woods for locally scarce species and nationally scarce and declining plants and on the basis that AONB designation would help to protect and conserve this natural beauty by stopping harmful development.</p>	<p><u>Commentary</u></p> <p>The Natural Beauty Assessment Report (Page 45) noted the natural heritage value of the woodlands at Backside Common. It also noted on page 46 that views to the area of distinctive topography within the existing AONB (e.g. Hog's Back) lift the scenic qualities of the landscape alongside and that the scenic quality of this landscape is transitional as it moves northwards away from the iconic topographic feature of the Hog's Back.</p> <p>When drawing a boundary within areas of transition Natural England Guidance (Appendix 4) states that <i>'the boundary chosen should be an easily identifiable feature....The boundary should be drawn towards the high-quality end of the transition....visual associations may also be used to help define the extent of land for inclusion...'</i></p> <p>The Boundary Considerations Report notes at page 13 that <i>'the gently falling topography towards the railway and flatter areas of secondary woodland associated with Backside and Broadstreet Common were not considered to be outstanding.'</i></p> <p>Natural England acknowledges that Natural England Guidance on boundary considerations (Appendix 4) also states that <i>'areas and features ofvalue.....which are situated on the margins...should be included where practicable providing that they are situated within a</i></p>

Boundary		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
		<p><i>tract that meets the statutory criteria.'</i> The Boundary Report acknowledges at page 14 that <i>'there are a number of SNCI woodlands associated with Backside/Broadstreet Common, however these have been excluded as they sit on the margins of the qualifying area and lack the qualities of ancient woodland further west, reflecting secondary woodland on former common land. The southern edge of these woods was considered to form a robust boundary.'</i></p> <p>Natural England Guidance is also clear that <i>'land should not be included merely to seek to protect it from specific development proposals.'</i> (Appendix 4)</p> <p>Natural England has reviewed the reasons for extending the boundary in this area and also the conclusions reached during the assessment and on balance considers there is no strong justification for amending the proposed boundary.</p> <p>Furthermore, Natural England has reviewed the land within the proposed boundary extension which is the subject of a planning application for a solar farm. This is detailed below in relation to land at Wildfield Copse.</p> <p><u>Conclusion</u> No change.</p>
Include Manor Copse and Strawberry Grove	<p>ANON-VUXE-WEAY-X requested the inclusion of Manor Copse and Strawberry Grove.</p> <p>Reason include:</p> <ul style="list-style-type: none"> • Small conifer plantation but predominantly constitutes mature native deciduous trees and associated flora- bluebells, early purple orchids • Diverse hedgerow species including bullace and spindle. 	<p><u>Commentary</u></p> <p>The Natural Beauty Assessment Report noted Strawberry Grove and Manor Copse as comprising areas of recent mixed plantation, with some mature oak stands. It also noted that <i>'the woodland of Strawberry Grove in the far east of the area reflects the former extent of the 12th century deer park. It is associated with Guildford's Royal Park within which there are some remnant banks and deer leaps</i></p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> Extending north to the railway line would include mature woodland of Wildfield Copse, and in particular Backside Common which has some splendid old trees. 	<p><i>dating back to Henry II. However, these features do not make a significant contribution to natural beauty.'</i></p> <p>These areas were found to sit on the margins of the Candidate Area.</p> <p>In the Boundary Considerations Report, consideration was given to defining a boundary taking account of the planning allocation associated with Blackwell Farm. The boundary was drawn back to the west to exclude the allocation in accordance with Natural England Guidance. It was also drawn along the south side of Backside Common for the reasons set out in the Boundary Considerations Report at page 14 which states that <i>'there are a number of SNCI woodlands associated with Backside/Broadstreet Common, however these have been excluded as they sit on the margins of the qualifying area and lack the qualities of ancient woodland further west, reflecting secondary woodland on former common land. The southern edge of these woods was considered to form a robust boundary.'</i></p> <p>As a result, these woodlands are not proposed for designation as AONB.</p> <p><u>Conclusion</u> No change.</p>
Inclusion of land at Blackwell Farm and proposed access	<p>ANON-VUXE-WEZC-1, ANON-VUXE-WEW5-G and ANON-VUXE-WSKG-4 all requested the inclusion of land at Blackwell Farm.</p> <p>Their responses include a number of points and areas which have been summarised below:</p> <p>Land north of the A31 at Blackwell Farm Reasons for the inclusion of this area include:</p>	<p><u>Commentary</u></p> <p><u>Doubt regarding Guildford Plan Allocations</u> The allocation to the southwest of Guildford for housing and proposed access currently remains within the adopted Local Plan. Their allocation has led to these areas being excluded from the proposed boundary extension in accordance with Natural England Guidance.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> exceptionally beautiful and meets most of the criteria for AONB status. It has been assessed by independent landscape consultants commissioned by Compton and Worplesdon PCs as worthy of AONB status and by the Alison Farmer current and earlier consultations. A small section of land has been earmarked in the Guildford Local Plan 2019 for an access road. This small strip is currently responsible for exclusion of 5 fields which form the most impressive views of the Northern slopes of the Hogs Back and the ancient wood as well as the significant view of the Cathedral rising above green fields. These fields include Lodge, Down Bottom, Corner, Front Down Place and FDPM - see map. The cost of this road, shown in the Local Plan as £30-35 million together with the required payment to GBC for access over their ransom strip, an amount related to the uplifted land value, makes the likelihood of this road being delivered extremely low. The [Office of National Statistics] ONS confirmation that the population figures and hence housing requirement in the Local Plan 2019 is overstated and there is the current review of the Local Plan to which [Guildford Borough Council] GBC full Council passed a motion to consider re-instatement of greenbelt status and removal of strategic sites should the review so support. The hamlet of 4 residences at Down Place are shielded by trees and do not impact on the views from the existing AONB. These properties abut on their northern and eastern sides the land allocated for development in the Local Plan 2019 and [Anon] agree with Natural England decision to exclude them from the AONB. The Inspector for the 2003 Local Plan stipulated that no development should take place in these fields utilising a height level above which there was to be no development. The Inspector in the Local Plan pt1 2019 stated any 	<p>The exclusion of 5 fields is a result not just of the allocation but also of the need to follow a clear feature on the ground. The Boundary Assessment at page 14 noted that <i>'At Down Place consideration was given to adopting the edge of the Blackwell Farm allocation. However, this was not marked by a clear feature on the ground. A decision was therefore made to take the boundary further west and along the track and public right of way, west of Down Place. This enabled the boundary to follow a clear line on the ground while also excluding the allocated site in its entirety.'</i></p> <p>Natural England recognise that there is some doubt over the feasibility of access arrangements to the Blackwell Farm allocation site. Nevertheless, there has been no change in the status of this land in terms of its allocation within the Local Plan. There are also no detailed design proposals for the access road. Natural England therefore considers that it remains appropriate to exclude this land from the proposed boundary extension.</p> <p>However, should circumstances change prior to the Designation Order being made and issued to the Secretary of State, then the definition of the boundary in this area should be reviewed.</p> <p><u>Review solar farm application</u></p> <p>Natural England has reviewed the planning application associated with land west of Blackwell Farm. It comprises three areas of solar panels (Wildfields Field, Big Misley field and Little Misley field) and access tracks. This application was submitted to Guildford Borough Council in December 2022 and was not taken into account in the Natural Beauty Assessment Report. A revised application was submitted in March 2024 and is currently undetermined at the time of writing. This proposed development falls within the area for AONB designation as part of the boundary review.</p>

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	<p>proposed access road would start in the AONB and would need to be cut into the hillside and masked with hedges and trees so as to minimise the visual impact etc.</p> <p>Respondents ANON-VUXE-WEMD-N along with ANON-VUXE-WEW5-G and ANON-VUXE-WEZC-1 also raised particular concerns regarding the Blackwell Farm Solar Planning Application (22/P/02178) which would include the establishment of solar development on three parcels of land currently proposed for designation in the boundary extension (Chalk Pit, Fifteen South, Fifteen North, Oak, Little Misley, Big Misley and Wildfield). They requested that this land remains included within the proposed extension despite the planning application on the basis that:</p> <ul style="list-style-type: none"> Solar development is temporary – 30 years Various assessments have all concluded that this land merits designation as AONB. 	<p>Appendix 4 of the Natural England Guidance states that land which is allocated or has planning permission at the margins of the area should be excluded, unless the land will be developed or restored to a land use and quality which contributes to AONB purposes.</p> <p>Given that a decision has not yet been made, Natural England considers that there should be no change to the current proposed boundary. However, should circumstances change prior to a Designation Order being made, then this will need to be reviewed. If development is approved Natural England will review the Natural Beauty Assessment Report to determine if the land should continue to be included within the proposed boundary, taking account of the nature of the development and its location on the periphery of the area.</p> <p>Following the second (2024) statutory consultation, planning permission was granted for a solar farm west of Blackwell Farm (Application No. 24/P/00441). Natural England understand that, at the point of publishing this report, the planning decision may be subject to a challenge by way of judicial review. However, the status as it currently stands is that the planning permission has been granted and the solar farm development has planning approval. Natural England has therefore reviewed the boundary in this area on the basis that the planning application has been approved.</p> <p>The approved solar farm comprises major development on the margins of land proposed for designation. Natural England has reviewed the Planning Officer Report and notes the acknowledged harm to landscape qualities (para 12.4) as a result of the scheme, despite mitigation. Natural England has also reviewed the proposals and has concluded that the approved development would result in the fragmentation of the land such that the area would no longer meet the Natural Beauty Criterion. Given the peripheral location of the</p>

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		<p>development and Natural England's boundary considerations, Natural England has concluded that the boundary should be revised to exclude the development. This is consistent with Natural England guidance Appendix 4, as stated above.</p> <p>A revised boundary has therefore been defined which extends from Bushy Farm along hedgerows and the western edge of Wildfield Copse, turning west along a tract and then south and east along field boundaries. It then follows the southern edge of Mistley Copse before adopting the access tract to rejoin the proposed extension boundary southwest of Down Place.</p> <p>Natural England will continue to monitor this situation and if the status of the planning permission changes during the designation process, then the proposed boundary will be reviewed.</p> <p><u>Conclusion</u> Deletion of land to exclude solar farm (refer to Figure 14c – Deletion 15).</p>
<p>Include Sutton Place Park, Sutton Green and Wey Floodplain</p>	<p>ANON-VUXE-WEQS-8 wished to see a significantly larger area included which connects EA2b with EA6 across the north of Guildford. Respondent ANON-VUXE-WSK1-E wished to see the Wey Floodplain to the northeast of Guildford also included.</p> <p>Reasons given include:</p> <ul style="list-style-type: none"> • Ancient veteran and notable trees. • Tumulus at Jacobs Well. • Sutton Green Conservation area . • Sutton Place Grade I listed former home of Sir Richard Weston built 1525 and Sutton Place Park and Garden Grade II* see maps, including many more listed buildings, monuments, ancient and veteran trees. etc. 	<p><u>Commentary</u></p> <p>The evidence presented as part of this submission focuses on the area northeast of Guildford around Jacobs Well. It is acknowledged that this area contains some high-quality landscapes as well as natural and cultural interest. Nevertheless, it was assessed at the boundary assessment stage in relation to EA2b. This area was discounted on the basis of it forming an isolated area of interest within a wider area of non-qualifying land due to fragmentation. It was therefore not taken any further.</p> <p><u>Conclusion</u> No change.</p>

Boundary		
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	<ul style="list-style-type: none"> Scheduled monument Old Manor House at the site of St. Edward's Roman Catholic church. St. Edward's Roman Catholic church, Grade II listed lovely views across fields down to the boundary trees from the church. The river Wey and Godalming navigation Conservation area forms a natural boundary to Sutton Park towards Send and its cut as a green corridor running as a green finger south from Bowers Lock with its veteran and ancient oaks and willows said to have been planted by Sir Richard Weston south of the river cut to Grade II listed Stoke Mill House. Sutton Place entrance lodges and gates grade II stunning on the A3. Sutton Place Park contains ancient woodland on the hill rising up from the river. The ancient woodland continues across the A3 at Lord Onslows Cotts Wood and Frithys Wood and a smaller area by Merrow Common all covered by TPOs also a strip by Nuthill Farm. Most of this area is green belt. The Wey floodplain is a Riverside Park which connects to Burpham Court Farm and then Sutton Place. Water meadow landscape. 	
Request for Exclusion of Areas		
Exclude land at Wildfield Copse	<p>ANON-VUXE-WS1T-Q requested that the land in the vicinity of Wildfield Copse be excluded from the proposed Extension Area. They provided a technical review undertaken by consultants.</p> <p>Reasons for excluding land at Wildfield Copse include:</p> <ul style="list-style-type: none"> Lack of evidence from the HDA to justify the inclusion of this land for designation. 	<p><u>Commentary</u></p> <p>Natural England has not relied upon the results of previous landscape evaluation such as the Hankinson Duckett Associates (HDA) study, it nonetheless shows a degree of consensus that this land meets the designation criterion.</p>

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	<ul style="list-style-type: none"> • Taking forward EA2a when parts were identified in the assessment as not qualifying in terms of natural beauty. • Reference in the Natural Beauty Assessment Report is made to revisiting the natural beauty assessment and refinement of areas considered to qualify but this did not happen. • Substandard areas have therefore been included in the boundary. 	<p>Figure 1 of the technical report submitted on behalf of this respondent illustrates a green shaded area and labels it AONB extension Evaluation Area EA2 – - this was the original EA which went out as part of the 'Call for Evidence'. On receipt of evidence the Extension Area was extended further to the east, up to the existing built edge. The Evaluation Area was then subdivided into EA2a and EA2b. The Natural Beauty Assessment was carried out for these subareas and the evaluation table details the results.</p> <p>Not all of EA2a was found to qualify and the subsequent Candidate Area did not include the whole of the area. The Candidate Area was shown as a hatched area with no outward boundary in accordance with Natural England Guidance and the Natural Beauty Assessment Report highlighted that the landscape was in transition.</p> <p>The findings of the Natural Beauty Assessment Report were reviewed at the boundary setting stage (refer to page 13 of the Boundary Considerations Report). Page 14 of the Boundary Considerations Report provides the rational for the boundary extending as far as the edge of Backside Common.</p> <p>The Boundary Considerations Assessment notes at page 14 <i>'Consideration was also given to the adoption of West Flexford Lane as the boundary, however this was judged to cut across the sweep of land, especially east of Homstead Farm, where the land rises slightly at Wildfield Copse. On balance the boundary was drawn within the transition, ensuring the inclusion of farmland which formed part of an uninterrupted sweep of land and areas of prominent woodland such as Wildfield Copse, whilst excluding land which was less visually or physically connected and of lesser quality.'</i></p> <p>This area has been reviewed on site. In the vicinity of Wildfield Copse, the landscape expresses distinct undulations, reflecting the sinuous lines of the wider lower slopes of the Hog's Back and</p>

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		<p>combined with woodland and hedgerows forms a seamless part of the sweep of landscape extending from the Hog's Back. Natural England acknowledges that the proposed boundary could be drawn along West Flexford Road and that Windfield Copse contains some mixed conifer plantation (as noted in the Natural Beauty Assessment Report). Nevertheless, Natural England also considers that the land to the north of the lane, around Wildfield Copse, is also of high quality and contributes to the natural beauty of the wider tract. Natural England therefore does not agree that the boundary has been drawn to include substandard areas beyond the transition.</p> <p><u>Conclusion</u> No change.</p>