

Appendix 1: Detailed Analysis of Method and Approach Responses

Support for the approach adopted		
Theme	Representations	Recommended Natural England Commentary
Value of the Call for Evidence	<p><u>Support</u></p> <p>ANON-VUXE-W5FD-X <i>[Anon] has long believed that more of the parish merited inclusion within the AONB and was pleased to see residents submitting their views and photographs in response to the call for evidence undertaken late 2021/early 2022. [Anon] is grateful to Natural England for introducing this early stage call for evidence which has provided reassurance to our community that Natural England values their input.'</i></p> <p>ANON-VUXE-W5CD-U <i>'I submitted evidence to the early-stage call and am grateful for the opportunity Natural England extended to the public.'</i></p> <p>ANON-VUXE-WEGW-2 <i>'[Anon] also notes the volume and quality of public responses to the call for evidence in relation to the Parish, and which has resulted [in] several submitted photos being used in the consultation documents themselves.... ..[Anon] appreciates the extensive and diligent work carried out by Natural England and its advisers to identify a suitable revised boundary within Evaluation Area 13 Dunsfold Low Weald.'</i></p> <p><u>Concern</u></p> <p>ANON-VUXE-WEWN-9 This respondent raised concern regarding the use of evidence submitted by residents during the 'Call for Evidence' which it believes has been underplayed in the Natural Beauty Assessment Report and Desirability Assessment Report.</p>	<p><u>Commentary on Support</u></p> <p>Natural England Board, in May 2021, committed to testing and trialling a new approach to designation work, with a strong emphasis on collaboration and engagement. This approach is also set out in Natural England Guidance paragraph 11.3.</p> <p>Natural England agrees that the early 'Call for Evidence' has been a positive approach to engaging with stakeholders including the general public, and that it has provided useful information which has informed the assessment of natural beauty.</p> <p><u>Commentary on Concern</u></p> <p>Natural England has reviewed all evidence submitted during the Call for Evidence and integrated this evidence when undertaking the evaluation and making judgements in relation to natural beauty. A considerable volume of evidence was submitted, and Natural England's consultants have utilised</p>

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	<p>ANON-VUXE-WS1F-9 Raised concern that specific mention of species of flora and fauna provided during call for evidence was not included in the evaluation tables.</p> <p>ANON-VUXE-WECF-D Raised concern that reliance on evidence from the Call for Evidence, which came from screenshots and lack of site visits could be grounds for Judicial Review.</p> <p>A number of respondents raised concerns regarding the use of images in the Consultation Document which were regarded as inaccurate representations of the landscape (Hatchlands and East Clandon) or were of areas not proposed for designation (Dockenfield southern boundary).</p>	<p>evidence that is material to the assessment and, on occasion, to summarise evidence in the evaluation tables in order to keep reporting concise. The lack of the specific mention of evidence should not be taken to mean it has not been considered or indeed that has been underplayed.</p> <p>Natural England acknowledges that there were issues regarding the locational pins which were recorded on the Story Board Map and that in some instances the pin did not accurately reflect the area which was being discussed, or the photographs which were uploaded. Natural England acknowledges that some evidence may have been screenshots of third-party evidence rather than photographs taken in the field by respondents. Natural England's consultants mitigated the effect of inaccuracies or third-party evidence by ensuring detailed independent assessment of data and site work.</p> <p>Where respondents highlighted the incorrect use or labelling of an image in the Consultation Report, Natural England has noted these inaccuracies and reviewed judgements as necessary. Where errors have occurred in the technical documents, these have been noted and reviewed. The technical documents will be updated/amended prior to the submission of the Designation Order to the Secretary of State.</p>
Level of Detailed Evaluation	<p>ANON-VUXE-WSK2-F (Guildford Borough Council) <i>'GBC considers that the work undertaken by Natural England and its highly qualified consultant team has been professional and the consultation process open and inclusive. For these reasons, it supports the outcome of the proposed boundary extensions. GBC 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>ANON-VUXE-WEQ9-E</p>	<p><u>Commentary</u></p> <p>Natural England welcomes the support for the approach adopted.</p> <p>Natural England agrees and recognises that this type of assessment and evaluation work requires specialist skills and effective engagement and consultation. It also recognises the importance of rigorous analysis of evidence, ensuing judgments are transparent and robust.</p>

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	<p><i>'Thank you for undertaking the consultation and for the work in preparing the assessments and running such a considered process. I think that Natural England has an important, and sometimes difficult, role to play, but we are lucky to have the technical knowledge, insight and commitment that the organisation brings.'</i></p> <p>ANON-VUXE-WEC3-T <i>'The review has very carefully considered and balanced the options available.'</i></p> <p>ANON-VUXE-WEZ9-Q <i>'The assessments produced are very comprehensive. I can't think of anything which has been missed.'</i></p> <p>ANON-VUXE-WEZC-1 <i>'I welcome the extensive work carried out by Natural England with the support of the Surrey Hills AONB board and am in agreement with much of the proposed revisions incorporating extensions to the AONB.'</i></p> <p>ANON-VUXE-W5PF-A <i>'Excellent initiative, and fully support the proposal.'</i></p> <p>ANON-VUXE-W5PU-S <i>'The assessments are very thorough and professional.'</i></p> <p>ANON-VUXE-W5JA-Y <i>'Although there are a few typing/reference errors within the report I think the team has undertaken sound analysis of this area to join and extend the present AONB boundary.'</i></p>	

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	<p>ANON-VUXE-WEP2-6 <i>‘Congratulations on this work, on this consultation to be able to have people communicate their views and to get them addressed.’</i></p> <p>ANON-VUXE-WS18-U <i>‘We as [Anon] have respect for the detailed analysis which has led to these recommendations. Key issues which affect our area have been accurately identified...Important areas to be preserved and protected under the extension of the AONB are described beautifully in the consultation document.’</i></p> <p>ANON-VUXE-WSKR-F (Croydon Borough Council) <i>‘It is noted that the case for the extensions of the existing AONB into the Borough of Croydon is as a result of a comprehensive assessment supported by collaboration and engagement. Therefore [Anon] supports identification of an area within the Borough into the area known as the Happy Valley to be taken forward to become part of the Surrey Hills Area of Outstanding Natural Beauty.’</i></p> <p>ANON-VUXE-WEV6-G <i>‘On behalf of our residents, we would like to express our appreciation for the considerable amount of work that has created the consultation documents.’</i></p> <p>ANON-VUXE-WMC7-6 <i>‘I think the whole programme is wonderful and am fully supportive of extending these boundaries and protecting our natural habitat further.’</i></p>	

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Level of Detailed Assessment	<p>ANON-VUXE-W5WY-4 <i>'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>ANON-VUXE-WEX6-J Consultation Document and evidence base fail to provide an objective assessment of the impacts of what is proposed.</p>	<p><u>Commentary</u></p> <p>All of the technical assessments relating to the Surrey Hills AONB Boundary Review have been undertaken by highly qualified and experienced landscape assessors. The detailed analysis and judgements reached during the project can be found in the technical reports relating to natural beauty, desirability and boundary considerations. These documents were made available for the Statutory Consultation period and remain available on the project website.</p> <p>Natural England's approach to evaluating the landscape and determining those areas suitable for inclusion within a Surrey Hills AONB boundary extension is in accordance with Natural England Guidance.</p> <p>If land qualifies in terms of its natural beauty it is then considered in relation to the desirability to designate. Natural England Guidance sets out what should be considered in relation to this stage of the assessment and the Desirability Assessment sets out in detail the issues affecting qualifying land and management arrangement which would apply post designation.</p> <p>Respondent ANON-VUXE-WEX6-J raises a number of specific concerns relating sites within the current planning system and housing supply and these are addressed in more detail below.</p>
Definition and Size of Evaluation Areas	<p>ANON-VUXE-WS1T-Q <i>'The assessment parcels [Evaluation Areas] are too large a scale, resulting in inappropriate inclusions of peripheral land parcels.'</i></p> <p>ANON-VUXE-WS1F-9</p>	<p><u>Commentary</u></p> <p>Natural England Guidance set out that the broad study area (or Area of Search) is <i>'divided into units of an appropriate scale to provide a spatial framework of landscape units'</i> (para 4.1). Para 4.2 goes on to state that <i>'Evaluation Areas should normally be defined, at least initially, using recognised landscape character assessment techniques described in national guidance - this may include the amalgamation of a number of character areas</i></p>

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	<p><i>'This proposal [Chalk Lane area] was included within a much larger area for evaluation (EA-6b) and that may have diluted the possibility of detailed consideration.</i></p> <p><i>Section 4.4.9 mentions refinement of evaluation areas. I believe that EA-6b should have been subdivided into areas north and south of the A246 (at least).'</i></p>	<p><i>or types as defined in existing landscape character assessments to reflect broader areas and to keep the evaluation process manageable.'</i></p> <p>Para 4.4. sets out that <i>'The use of Evaluation Areas is intended merely to make the practical work of detailed evaluation of landscapes more manageable. It is not intended to lead to the designation or exclusion from designation of any land merely because of the way in which Evaluation Areas have been defined. That is why the process is intended to be flexible and iterative in its application.'</i></p> <p>Natural England considers that the Evaluation Areas defined for the Surrey Hills have been defined at an appropriate scale and that, where necessary, and to reflect changes in landscape character, they have been subdivided to enable effective analysis and reporting. Natural England does not agree that the scale of the Evaluation Areas has resulted in the inappropriate inclusion of peripheral land parcels. The detailed Natural Beauty Assessment Report tables set out evidence relating to natural beauty and the spatial variation of areas which express sufficient levels of natural beauty. This analysis also sets out where further scrutiny is required at the boundary setting stage. This process seeks to exclude peripheral land which is lower quality.</p> <p>Furthermore, Natural England does not consider that particular features and characteristics of a landscape have been diluted as a result of the definition of Evaluation Areas. Where there are features and factors which contribute to natural beauty they are recorded in the evaluation tables and concluding judgements set out the spatial distribution of areas which express sufficient levels of natural beauty. Where respondents have highlighted evidence, evaluations have been reviewed to ensure the evidence has been effectively taken into account when reaching judgements.</p>

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Weight given to Natural Beauty Factors	<p>ANON-VUXE-WEAP-N</p> <p><i>'The weight and importance and relative importance given to different factors and indicators will vary depending on the geographic context. The context of the Surrey Hills as a lowland landscape, set within the London Metropolitan Green Belt, as oppose for example to remote, northern upland landscapes, means that [Anon] considers that the relative weighting should be used when considering the extension of the Surrey Hills.'</i></p>	<p><u>Commentary</u></p> <p>Natural England agrees that decision making on landscape designation relies on expert, professional judgements, and the weighting of considerations, depending on the particular circumstances of each case (Para 1.6 of Natural England Guidance). Although the Guidance is not exhaustive and it is possible to depart from it, where circumstances demand it, the Guidance makes clear that the actual words of the relevant statutory provisions need to be applied in decision making on designations, and that while Natural England has discretion, this discretion is conferred upon it again by statute.</p> <p>The wording in the statute is clear - Section 82(1) of the Countryside and Rights of Way Act 2000 (CRoW) defines an AONB in England as an area that is not in a National Park but which appears to Natural England to be of such outstanding natural beauty that it is desirable that the protective provisions of Part IV of CRoW should apply to it for the purpose of conserving and enhancing the area's natural beauty.</p> <p>The Natural England Guidance at para 6.10 third bullet states:</p> <p><i>'The weight and relative importance given to different factors or indicators may vary depending on the geographic context. For example, in the South Downs, less weight was given to relative wildness and more to relative tranquillity and natural and cultural heritage features, reflecting the area's lowland, settled character and proximity to major centres of population. Comparisons are not to be made to other designated areas or adjacent areas but against 'wider countryside'.</i></p> <p>Natural England confirms that a similar approach has been adopted in relation to the Surrey Hills Boundary Review.</p>

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Scenic Beauty of views from transport infrastructure and urban edge	<p>ANON-VUXE-WEAP-N <i>'Great weight should be applied to the scenic beauty of views accessed by transport infrastructure and from the urban edge. Being within the busy area of London and Surrey means that the scenic quality of the Surrey Hills provides a benefit to millions of people. For example, users of the M25 and A3 benefit from outstanding views of the AONB, which provides tremendous benefits to the nation.'</i></p> <p>ANON-VUXE-WSQY-V Raised concerns regarding insufficient recognition of the scenic beauty of views accessed by transport infrastructure and at the urban edge.</p>	<p>Commentary</p> <p>Natural England acknowledges that the major transport routes and urban edge can offer views towards outstanding landscapes, indeed this is the case for parts of the road network which pass through, or are adjacent to, the existing Surrey Hills AONB and settlement which is located within or adjacent to the existing designation.</p> <p>However, Natural England does not agree that views from transport routes or urban edges should be used as a justification for designating areas of land. The land itself should express sufficient natural beauty whether or not there are views of it from transport networks or built-up areas. Any assessment of natural beauty will, in turn, take account of the effect of transport networks and settlement on the natural beauty of the area, in accordance with Natural England Guidance (Para 6.11 and 6.12). In particular, the cumulative impact of such features, and the degree to which qualifying parts of a potential extension area are fragmented by incongruous features, may be relevant to the assessment.</p>
Natural Heritage being bigger, better managed and better connected	<p>ANON-VUXE-WEAP-N <i>'Great weight should be applied to natural heritage being bigger, better managed and better connected through the extension project. In recent years, public bodies have all declared a climate and biodiversity crisis which demands that we do need to do things differently and urgently. At the heart of national policy are the Lawton principles of nature being bigger, better managed and better connected. This is driving the priorities for the Surrey Hills around nature recovery, the Surrey Hills Making Space for Nature Strategy and Farming in protected Landscape (FiPL) environmental land management</i></p>	<p>Commentary</p> <p>Natural England acknowledges the important findings of the Lawton Review and the Landscape Review lead by Julian Glover, and the climate and biodiversity crises, and of the important role of National Landscapes to help address these issues. However, the Natural England Guidance at para 6.10, fourth bullet, states:</p> <p><i>'Natural beauty is assessed in terms of the current landscape, not some future potential for improvement. A rare exception may however apply where an existing initiative will deliver positive change of a standard which will meet the natural beauty criterion within the short term and for which there is a high degree of certainty that it will be achieved.'</i></p>

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	<i>scheme.'</i>	<p>Footnote 12 goes on to explain that:</p> <p><i>'The legislation in relation to the natural beauty designation criterion for both National Parks and AONBs is expressed in the current tense, i.e. current natural beauty and there is no equivalent provision in the legislation for consideration of 'future opportunities' in relation to natural beauty as there is in NPAC 1949 s5(2A(b)) in relation to promoting opportunities for the understanding and enjoyment of the special qualities for national parks.'</i></p> <p>Natural England is therefore of the view that addressing the climate and biodiversity crises is of primary importance once designation has taken place, but that the future potential to enhance biodiversity and ensure that habitats are bigger, better managed or connected should not be used as a justification for designating areas of land as AONB. The land itself must express sufficient natural heritage interest and contribute to an appreciation of natural beauty, whether or not there is potential to make it bigger, manage it better or connect it with other areas.</p> <p>This issue is also addressed within Appendix 2: Detailed Analysis of Desirability Responses.</p>
Cultural Heritage and the Role of Historic Parkland	<p>ANON-VUXE-WEAP-N</p> <p><i>'Great weight should be applied to historic parkland and its contribution to the Surrey Hills, in particular recognising the contribution of parkland golf courses where they retain outstandingly beautiful landscapes. Human activities have had a great impact on the landscape of the Surrey Hills. Outside London, Surrey has more historic parks and gardens than any other part of the nation. The parkland is an important component of the Surrey Hills landscape, valued for its picturesque and historic interest. There is a particular</i></p>	<p><u>Commentary</u></p> <p>Natural England acknowledges that historic parkland can contribute to the natural beauty of a landscape and that parkland is an important component of the Surrey Hills AONB. Furthermore, the Natural England Guidance (Para 6.3) states that:</p> <p><i>'the presence of particular wildlife or cultural heritage features can make an appreciable contribution to an area's sense of place and thereby heighten the perception of natural beauty.'</i></p>

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	<p><i>relationship with formal estates and buildings on the spring line, with more formal parkland often just outside the existing AONB, but traditionally there has been a coherent relationship between the wider estate management of pasture, heaths, and woodland in the AONB. With the decline in traditional estate and farm management it is now the role of golf courses and sometimes equestrian activities to help maintain the management of these historic parkland landscapes.'</i></p> <p>ANON-VUXE-WSK7-M <i>'Much of what happens in the countryside such as the loss of woodland, veteran trees, hedgerows, parkland boundary features, and the fragmentation of landscapes, Heritage at Risk due to lack of maintenance and management, golf course extensions, mineral extraction, equestrian use and intensive arable cultivation affects the framing of significant views and parkland character settings especially when impacting on Registered Parks & Gardens.</i></p> <p><i>[Anon] therefore welcomes the significant extensions of the Surrey Hills AONB as now proposed and the extra protection that should accrue against development pressures. [Anon] notes and welcomes the acknowledgement of the interests of historic parks and gardens in the review work to date and the boundary changes now proposed. For example, but not exclusively, particularly welcome are the Betchworth Hills and River Mole extension, and the proposed extensions to include the register sites of Hatchlands, East Clandon and Gertrude Jekyll's Munstead Wood (recently acquired by the National Trust). The boundaries as proposed will also include many other parks and gardens of local interest that are either already</i></p>	<p>And (para 2.6 3rd bullet) that: <i>'Land is not prevented from being treated as of natural beauty by the fact that it is used for agriculture, or woodlands, or as a park, or that its physiographical features are partly the product of human intervention in the landscape (s.99 Natural Environment and Rural Communities Act 2006).'</i></p> <p>Appendix 1 of the Natural England Guidance sets out the sub-factors of cultural heritage including designed landscape, and where the example indicator refers to the presence of visible parkland or designed landscape that provide striking features in the landscape, contributing to perceptions of natural beauty.</p> <p>Natural England is of the view that the extent to which parkland or former parkland contributes to the natural beauty varies, and must be considered on its own merits. Natural England agrees with [Anon] that management of former parkland as golf course or equestrian use may impact natural beauty factors. The presence of parkland or former parkland is not a justification in itself for designating areas of land. The contribution parkland makes to perceptions of natural beauty is, in part, dependant on its intactness and condition and that changes in land use, be they golf course, equestrian use or development, may alter the expression of parkland qualities and their contribution to natural beauty.</p>

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	<i>included on Local Lists prepared by the planning authority or worthy of identification as non-designated heritage assets.'</i>	
Landscape Quality – role of farming, golf courses and equestrian uses	<p>ANON-VUXE-WEAP-N <i>'Less weight should be applied to areas of farmland maintaining landscape quality and to acknowledge the role of conservation, golf and horse pasture in managing beautiful landscapes. The Surrey Hills AONB Management Plan describes the AONB as a landscape that has been developed and maintained by traditional farming and land management. The Plan also identifies the pressures on traditional agriculture and farming in the Surrey Hills area. These include the lack of associated infrastructure, relatively poor soils, high land values and competing pressures as well as relatively small scale and fragmented farmsteads. Although a priority is to retain our diminishing traditionally farmed landscape, economically viable activities like golf courses and horse pasture can provide for and manage beautiful landscapes. '</i></p> <p>ANON-VUXE-WEZ7-N (Mole Valley District Council) Leisure use of the landscape presents an obstacle to Natural England in their assessments.</p> <p><i>'this is considered to be short-sighted in some cases as golf courses are regularly associated with the nature of the county and are arguably part of its cultural heritage and identity. Due to the prevalence of golf courses in Surrey, [Anon] is concerned that, as with Beaverbrook, large swathes of open and natural green space may be unfairly discounted from</i></p>	<p>Commentary</p> <p>Natural England acknowledges that golf courses and equestrian land uses do not prevent an area from expressing natural beauty and qualifying for designation as AONB (this is borne out in the proposed Extension Areas and existing AONB designation). However, Natural England also considers that current land use (be it agriculture, golf course, horse pasture or restored minerals site) can affect landscape condition and intactness. This may manifest itself in the condition of features and legible patterns, removal of features/loss of patterns or the introduction of new elements which may alter perceptions. The extent to which this affects judgements on natural beauty, and/or the definition of a boundary, depends on the nature of the changes, the strength of other natural beauty factors and the extent of land affected, cumulative effects with incongruous elements, as well as its position in relation to the boundary.</p> <p>The exclusion of land is not a reflection of the exclusion of leisure use of landscape – there are many examples where land which is used for leisure has been included within a proposed extension. The reasons for inclusion or exclusion of land relates to the natural beauty of the landscape. The topography, vegetation pattern and scale/drama of the landscape may be such that use of the land as golf course does not detract from the natural beauty of the landscape as a whole. Similarly, the presence of a golf course within a former parkland landscape may not detract from landscape elements which express the parkland character. For example, the legibility of the designed elements of the landscape and how they relate to topography, watercourses and borrowed landscape views. Where these parkland qualities</p>

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	<p><i>inclusion within the AONB due to this and may prevent natural beauty from being properly accounted for where it is justified. Furthermore, by the very nature of the golf course, the fairways and holes have required the protection and careful management of the land, keeping it open and green. The course had made good use of the undulating land within which it sits and the undulating nature is a quality that is characteristic of the Surrey Hills.'</i></p> <p>BHLF-VUXE-WSK3-G <i>'Mineral workings, especially where they have been restored or are near restoration should not be excluded but instead be recognised where they have been improved to AONB quality landscape. Natural England assessment has skirted around and not included any of the mineral sites that pocket the Surrey Hills area. If a golf course can be included why not a minerals site?'</i></p>	<p>are strongly expressed, irrespective of golf course use, land may be included within an AONB extension area. Where golf courses lie on the margins of qualifying land, their context is carefully considered. Where they lie within a transitional landscape, and/or where they sit predominately surrounded by development, they may be excluded.</p> <p>Natural England, in its assessment of natural beauty, has considered the qualities of the landscape on its merits and in relation to the natural beauty factors.</p> <p>Where landscapes have formed past minerals sites and have been restored, or are undergoing restoration, Natural England has considered the timescales involved and the type and nature of the landscape. Natural England Guidance states at para 6.10, final bullet that <i>'Natural Beauty is assessed in terms of the current landscape, not some future potential for improvement. A rare exception may however apply where an existing initiative will deliver positive change of a standard which will meet the natural beauty criterion within the short term and for which there is a high degree of certainty that it will be achieved.'</i></p> <p>In areas where there has been past minerals extraction and successful restoration, Natural England has considered whether the resulting landscape expresses sufficient natural beauty to be considered suitable for designation and, where restoration is still ongoing, considers the timeframe for completion of the works and period in which a landscape of sufficient natural beauty will evolve. Natural England disagrees that it has skirted former minerals sites. Natural England has included a number of restored sites within the proposed boundary where they form part of a tract of qualifying land e.g. Buckland Park Lake and Godstone Sandpit.</p>

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Relative nature of Tranquillity and Wildness	<p>ANON-VUXE-WEAP-N <i>'Great weight should apply to relative wilderness in areas which have large uninterrupted views with minimal impact of built development. There are around 10 million people living within an hour of the Surrey Hills. With its relatively small size, this makes the Surrey Hills one of the busiest of the 44 National Landscapes. It is therefore difficult to apply the wilderness criteria in the Surrey Hills in the same way that it can be applied to very remote, extensive landscapes of the northern National Parks or the North Pennines AONB. Nevertheless, it is remarkable that there are so many vantage points across the Surrey Hills and in the proposed extension areas, with far-reaching views and without the intrusion of built development. This is further enhanced by the fact that the Surrey Hills has some of the highest cover of woodland in the country at 40% (the New Forest National Park has 36%) which helps to give the sense of remoteness and tranquillity.'</i></p> <p>ANON-VUXE-W5UR-U (Surrey County Council) <i>'We consider that the assessment should have placed less weight on tranquillity, given the proximity to more densely populated areas compared with remoter national landscapes. The effect of road noise from the M25 is variable depending on location, elevation, prevailing wind direction and season.'</i></p> <p>ANON-VUXE-WS13-P <i>'It would appear from reading your consultant's report that they have applied significant weighting to factors such as noise, particularly in relation to aircraft (Redhill and Gatwick) and roads (A22 and M25) none of which seriously affect the EA10b area on an ongoing basis in terms of tranquillity. Negative</i></p>	<p>Commentary</p> <p>Natural England agrees that the assessment of relative wildness and tranquillity should be undertaken in the context of Surrey. This is consistent with the approach adopted in other designations such as the South Downs as set out in the Natural England Guidance (para 6.10, third bullet) and has been the approach adopted in the Surrey Hills AONB Boundary Review.</p> <p>Natural England acknowledges that views across land with little overt sign of built development, and the high woodland cover of Surrey, contributes to perceptions of relative tranquillity and wilderness. However, in making judgements in relation to relative wildness and tranquillity, Natural England makes reference to the sub-factors set out in Appendix 1 of the Natural England Guidance and, in particular, to the factors which contribute to, and detract from, tranquillity. This indicates that perceptions of tranquillity relate to <u>all the senses</u>, not just the visual, and that presence and or perceptions of traffic noises, large numbers of people, overhead light pollution and low flying aircraft can detract, even in areas where there are views across undeveloped landscape or woodland.</p> <p>Overall, Natural England does not accept that it has misapplied the natural beauty factors set out in the Natural England Guidance, or that its approach has not been sufficiently wide or constructive. Natural England has correctly applied the guidance. It accepts that some judgements are finely balanced and has endeavoured to set out how judgements are reached in a transparent and consistent way.</p> <p>The extent to which major road routes impact on natural beauty may depend on the scale and level of traffic on the transport route, the position of the route relative to topography (on embankment, at grade or in cutting), the extent of mature vegetation and seasonal changes, the topography of land beyond the</p>

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	<p><i>reference is also made of Godstone Golf Course which contrary to what is said, fits into the surrounding area in a very sympathetic way. Whilst we do understand that the definition of “beauty” is always going to be an extremely subjective exercise, we also feel that NE’s consultant’s [consultants] have not exercised or applied a sufficiently wide or constructive approach.’</i></p>	<p>transport route and the direction of prevailing winds. Natural England acknowledges that the level of noise intrusion may vary over time. Site assessments are undertaken at different times of the year to take account of these issues.</p> <p>Noise intrusion may also be cumulative as a result of a number of separate transport routes, along with other man-made noise such as aircraft noise, trains and other machinery or mechanical processes.</p> <p>It is Natural England’s view that where noise intrusion adversely affects perceptions of tranquillity, and perceptions of scenic and landscape quality, it can lower the overall weight of natural beauty such that an area is regarded as failing the statutory test for national designation. Each situation is assessed on its merits.</p>
Boundary Considerations	<p><u>Use of Roads and Railways</u></p> <p>ANON-VUXE-WEAP-N</p> <p><i>‘In considering a coherent and defensible boundary for the Surrey Hills, the approach has been to identify major roads and railway lines.’</i></p> <p><u>Views</u></p> <p>ANON-VUXE-WEAP-N</p> <p><i>‘For the areas of search within the London Metropolitan Green Belt we have made use of the Green Belt as the defensible boundary in circumstances where the scenic quality of outstanding views to the adjacent countryside is considered to meet the natural beauty criteria [Natural Beauty Criterion].’</i></p>	<p><u>Commentary</u></p> <p><u>Roads and Railways</u></p> <p>Natural England has utilised the boundary considerations set out in Appendix 4 of the Natural England Guidance to determine the boundary of areas of qualifying land. In each area, the circumstances vary and a pragmatic decision is made to identify the most suitable boundary line. Whilst Natural England accepts that in some locations the use of roads and railways may form suitable boundaries, in other situations their use may result in the inclusion of non-qualifying land or the definition of a boundary at the lower quality end of a transitional landscape. In all cases, Natural England seeks to balance the need to include only land which qualifies in terms of its natural beauty whilst also utilising easily distinguishable physical features on the ground. Where a boundary departs from this, a justification is given.</p> <p><u>Views</u></p>

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		<p>The boundary consideration relating to transitional areas allows for the use of visual association to help define the boundary where the landscape is in transition. This does not, however, equate to including wider areas of land simply because there is a view to that land from a qualifying area. Furthermore, considerations such as incongruous development and settlement on the fringes of a qualifying area may cause fragmentation of the landscape, such that it is not possible to define a boundary which includes peripheral pockets of countryside. Natural England has not utilised the Metropolitan Green Belt to define the boundary to the Surrey Hills AONB Extension Areas because Metropolitan Green Belt is not determined using the statutory technical criterion of natural beauty.</p>
<p>Insufficient use of Surrey County Landscape Character Assessment</p>	<p>A number of respondents expressed concern that the Natural Beauty Assessment Report did not make sufficient use of the evidence within the Surrey County Landscape Character Assessment.</p> <p>ANON-VUXE-WES8-F <i>'Surrey County Council's own landscape assessment [Landscape Character Assessment] clearly states the benefits of the area but much of this evidence seems to have been ignored.'</i></p> <p>ANON-VUXE-WEBT-R <i>'The Natural Beauty Assessment for this area and the land to the south of it does not make nearly enough use of the Surrey County Landscape Character Assessment even though it describes it as "the most up to date and comprehensive assessment for the area" which should make it a starting point and thus should be used as a key source, under the Guidance for Assessing Landscapes for Designation as National Park or</i></p>	<p><u>Commentary</u></p> <p>Natural England has referred to the Surrey County Landscape Character Assessment to inform the Natural Beauty Assessment Report. However, the process of characterisation and the classification of the landscape into character areas and types, and the describing of the landscape in terms of its character, is not the same as the evaluation of the landscape for AONB designation. Furthermore, it is commonly recognised that boundaries between character areas or types are not hard and fast boundaries but reflect gradual changes in character.</p> <p>Character areas and types within the Surrey County Landscape Character Assessment informed the definition of Evaluation Areas at the start of the evaluation process and their subsequent sub-division.</p> <p>The written descriptions within the Surrey County Landscape Character Assessment were used as one source of information when gathering evidence supporting the natural beauty factors. Other sources of information included other publications on landscape and site assessment, as well as evidence provided by stakeholders during the Call for Evidence. The overall</p>

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	<p><i>Area of Outstanding Natural Beauty in England.</i></p> <p>ANON-VUXE-WEQ5-A <i>'Surrey County Council's own landscape assessment clearly states the benefits of the area but much of this evidence seems to have been ignored, minimised or discounted in the ' findings ', with clearly inaccurate representation of the aircraft noise, road congestion and noise on the A22 and the extent of urbanisation...'</i></p> <p>ANON-VUXE-WEUX-H <i>'Pre-existing Landscape Assessments by the SCC have stated the benefits of the area but this information seems to have been largely overlooked in the analysis.'</i></p>	<p>weight of evidence was then considered when determining if the land qualified for national landscape designation.</p> <p>The proposed boundary takes account of changes in character and quality of the landscape especially in transitional landscapes.</p>
Mapping	<p>ANON-VUXE-W5CD-U <i>'I am concerned that the use of an out-of-date OS Base map has been used for the delineation of the area. This does not show the extent of Tapwood Lake (a quarry reflooded as part of Hanson's Restoration Plan. [Natural England's Magic database does show the presence of Tapwood Lake].'</i></p> <p>ANON-VUXE-WSQA-4 (Reigate & Banstead Borough Council) made a general comment on the mapping provided showing the proposed boundary at 1:25,000 scale. <i>'when zoomed in, the boundary appears to not be aligned to clear features such as roads.'</i></p> <p>ANON-VUXE-W5NR-M and ANON-VUXE-WMEA-J raised concerns regarding the existing AONB boundary shown on the Statutory Consultation Boundary Map Fig 28 and the AONB boundary as plotted on the Waverley Borough Adopted Local</p>	<p>Commentary</p> <p>Natural England always uses the most up to date base mapping where it is available and agrees that the 1:25,000 base map used to show the proposed boundary during the Statutory Consultation was not up to date in all areas, particularly where the landscape has undergone more recent change. This is why desk-based assessment, use of aerial photography and detailed site assessment is used in making judgements. In the case of Tapwood Lake Natural England is aware of the full extent of the lake and this area has been assessed in terms of natural beauty criterion as discussed in detail in Appendix 17 - Land north of the A25 and west of Clifton's Lane, including Tapwood Lake and Lawrence Lake and woodland south of the railway (page 11).</p> <p>Natural England produces the boundary map at 1:25,000 at the consultation stage to ensure that the number of maps produced is manageable and is in a format that people are familiar with.</p>

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	Plan Policies Map 2018.	<p>Natural England is aware that there may be some discrepancies regarding the mapping of the existing AONB boundary. This is due to the interpretation of the 1958 Designation Order Map and the mapping of the existing boundary at differing scales. The legal boundary of the existing AONB is that depicted in the Designation Order Map. Natural England will be undertaking a detailed review of the existing AONB digitised boundary at both 1:25,000 scale and 1:2500 scale, prior to the finalisation of maps for the Designation Order to ensure that any proposed Extension Area boundary departs from, and joins to, the current AONB in the correct location.</p> <p>The final boundary maps sent to the Secretary of State as part of the Designation Order will be prepared on the latest OS base mapping as well as within Master Map (1:2500 scale) to enable the boundary to be used in GIS systems.</p>
Boundary review should also include de-designation	<p>ANON-VUXE-WEVJ-4 and ANON-VUXE-WSQB-5 <i>'A robust review of the Surrey Hills AONB boundary should not just consider additional land to be included within the AONB designation, but should also consider the exclusion of land within the AONB which does not justify inclusion within the designation, and does not meet the requirements to constitute AONB status.</i></p> <p><i>The parts of the existing AONB designation which we consider needs to be reconsidered are land which:</i> <i>'Washes over' entire small settlements and urban areas, including (but not limited to):</i> <i>Westcott</i> <i>Chiddingfold</i> <i>Elstead</i></p>	<p>Commentary</p> <p>The brief for the Surrey Hills AONB Boundary Review specifically states <i>'The Natural England Board has now approved a project to determine whether the Surrey Hills AONB boundary <u>should be extended</u> and if so in which specific areas.'</i> It does not seek to consider land for de-designation, even where that land has subsequently been developed.</p> <p>Natural England has limited resources for landscape designation work and this resource is prioritised into designating new qualifying areas to meet Government priorities, and to ensuring that current designations receive sympathetic management to deliver their purposes, especially where there is scope for enhancement of natural beauty.</p> <p>Section 82(1) of the 2000 Act includes the words "where it appears" and "may". This gives Natural England discretion and does not place a duty on</p>

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	<p>Wormley Puttenham Grayswood Shere Gomshall Mickleham Clacket Lane Services; and vast stretches of the M25 and its immediate setting.</p> <p>Therefore, we ask for the AONB boundary review to also consider the exclusion of existing AONB land, as well as the inclusion of additional land.</p> <p>Subject to the necessary robust scrutiny of the natural beauty of the proposed 18 extension areas being undertaken, [Anon] does not have an in-principle objection to the proposed variation to the Surrey Hills AONB boundary.'</p> <p>ANON-VUXE-WSKU-J 'a robust review of the AONB boundary must also include a review of the existing boundary and not just additional areas of search. Any anomalies in the boundary should be reviewed and corrected as opposed to just expansion. There is no doubt that the boundary is out of date to meet the current infrastructure and development needs of Surrey. Updating the existing boundary, with potential new additions and any amendments to the existing boundary, will have the potential to improve the landscape quality of the AONB by excluding areas on settlement edges with limited tranquillity and wildness.</p>	<p>Natural England to formally re-consider AONB designations. Natural England is therefore acting within its rights to conclude that, even though land included in an AONB may no longer meet the statutory definition and in principle be removed from the designation, it is not going to make a boundary variation order to this effect. In any case, there is no requirement for every parcel of land in a designated landscape to meet the designation criteria and, in fact, there are often areas within a designation which do not meet the criteria but are included as part of a wider sweep of land that does qualify overall.</p> <p>On this basis, and in the context of the Surrey Hills, Natural England has taken the decision to undertake a boundary review of the Surrey Hills AONB which considers the case for boundary extensions, and not the de-designation of areas which are currently AONB. On this basis, it appointed consultants to undertake the technical assessments and set out within the consultant's brief that the evaluation should seek to determine land outside of the AONB which meets the Natural Beauty Criterion.</p> <p>The approach adopted by Natural England is further supported by the Minister's letter dated 6 May 2004, in which he said that he did not believe that "the tendency for proposals for minor changes to escalate into comprehensive boundary reviews... was the intention of the legislation". The Minister stressed that in the case of both National Parks and AONBs, "the final extent of the area to be the subject of a designation order will be entirely at the Agency's discretion". The subsequent Countryside Agency Board Paper AP04/25 said that the letter "should allow us to embark on limited boundary change exercises with greater confidence that we can prevent them from escalating into full boundary reviews" (para 8).</p> <p>Also, there is no presumption against development in a designation, and it is for the relevant local authorities to ensure that planning decisions weigh the purposes of designation against other priorities in their area in making their decisions.</p>

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	<p><i>There is no doubt that expanding the Surrey Hills AONB, without a robust review of the entire designated area, will restrict much needed development and have long lasting planning (and wider) implications.'</i></p> <p>ANON-VUXE-WSKP-D <i>'The landscape of Surrey has changed considerably in the past 65 years as towns, villages and infrastructure have altered. As a result, [Anon] believe that a robust review of the AONB boundary must also include a review of the existing boundary and not just additional areas of search. Any anomalies in the boundary should be reviewed and corrected, on the basis of evidence of valued landscapes today as opposed to just an exercise for expansion. There is no doubt that the boundary is out of date to meet the current infrastructure and development needs of Surrey. Updating the existing boundary, with potential new additions and any amendments to the existing boundary, will have the potential to improve the landscape quality of the AONB by excluding areas on settlement edges with limited tranquillity and wildness. In addition some more urban areas, or larger villages, presently 'washed-over' by AONB might also require review, to best reflect the predominant environs, which might be historic, or architectural for example. Overall, a robust 'review' should be just that, a review of the AONB in its entirety.'</i></p> <p>ANON-VUXE-WS1G-A <i>'The Surrey Hills AONB was established in 1958 and there has been no review of the boundaries of the original designation since it was established. However, there has been considerable change to the area covered by the AONB over</i></p>	

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	<p><i>the intervening 65 years which is not being properly considered by this review.</i></p> <p><i>New development and infrastructure has been delivered within the Surrey Hills AONB over the period since it was established, and this is highly likely to have altered the landscape and perception of the AONB in the areas that have been impacted by that development. At present, the review of the AONB boundaries only considers an extension to the existing designation. However, for the exercise to be robust and to properly reflect the current situation, a full review of all existing and potential future boundaries of the AONB needs to be considered.'</i></p>	
<p>Consideration of sites which are in the planning system</p>	<p>ANON-VUXE-WEX6-J <i>'Consultation document does not take into account sites which are already in the planning system (which may be determined prior to the conclusion of the Review), Local Plan allocations (including emerging and sites to be brought forward through Local Plan Reviews) and areas within settlement boundaries.'</i></p> <p>ANON-VUXE-WSKP-D <i>'It is understood that any sites allocated for development will most likely be excluded from any potential inclusion in the AONB boundary. An issue here is timing, with the Review likely to stretch into 2024, given the delays experienced in Stage 1 of the Review, and a Public Inquiry to follow (as we respectively request), perhaps into 2025.</i></p> <p><i>It is extremely likely that during the Natural England boundary review consultation and Public Inquiry process, which could take circa. three years if anticipated timescales are met, the Local Plan status and therefore allocated sites for development</i></p>	<p><u>Commentary</u></p> <p>Natural England Guidance sets out how land allocated for development should be considered at the boundary setting stage.</p> <p>It states in Appendix 4 that <i>'Land on the margins of a National Park/AONB identified in development plans (both adopted and emerging), or having the benefit of planning permission, for major built developments (including the extraction of minerals and other deposits) should normally be excluded from the Park/AONB, unless the land will be developed or restored to a land use and quality which contributes to Park/AONB purposes. Land should not be included merely to seek to protect it from specific development proposals.'</i></p> <p>Footnote 24 states that <i>'Proposed development schemes included in emerging development plans will be afforded varying weight depending on the extent to which they have progressed through the development plan preparation process and also the extent to which any adopted plans and / or policies may remain relevant.'</i></p>

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	<p><i>will evolve.</i></p> <p><i>The planning status of a site is a considerable consideration when determining the desirability and potential for a site to be included in the AONB. Therefore, [Anon] requests that a holistic approach is taken when considering the wider potential for any additional inclusions in the Surrey Hills AONB by excluding all sites that currently active in the planning system. Thus in approaching the issue of any boundary anomalies, Natural England should be mindful of the purpose and objective of including land within the AONB, notably that which is previously developed or within an existing settlement boundary.'</i></p>	<p>Natural England reviews Local Plans/planning allocations and planning applications close to or on the proposed Extension Area boundaries, throughout the designation process, in order to take account of relevant decisions which have a material bearing on the definition of the proposed boundary.</p> <p>Where major development is likely to happen within the body of an area of qualifying land, a decision has to be made as to whether the development would fragment the land to such an extent that it affects the ability of the area as a whole to meet the technical criteria (Paragraph 5.3 bullet 7 of Natural England Guidance).</p> <p>If, during the designation process, land becomes allocated for development or receives planning permission, or is allowed at appeal, then Natural England reviews this decision and alters its proposals to exclude relevant land where necessary.</p>
<p>Surrey Hills should become a National Park</p>	<p>ANON-VUXE-WSRE-9</p> <p><i>'The idea of changing the Surrey Hills AONB to a [North Downs] National Park is good as far as it goes, but I believe it misses an important opportunity to enlarge the vision.</i></p> <p><i>This proposed Park, like the North Downs Way, would run from Farnham in Surrey to the white cliffs of Dover in Kent, being somewhat wider than the Way in its scope, taking in such historic sites as Rochester, Canterbury, Biggin Hill and the Battle of Britain Memorial on the cliffs at Capel le Ferne. The area would include National Trust lands, the Pilgrims' Way, country parks, museums, castles and stately homes. The wider, surrounding countryside of the North Downs is home to farms, villages, schools, woods, rivers and wildlife</i></p>	<p><u>Commentary</u></p> <p>The decision by Natural England to undertake a review of the Surrey Hills AONB boundary has not included a review of the area in relation to a National Park designation which would require the additional assessment of opportunities for open-air recreation as set out in Natural England Guidance Section 7.</p>

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	<p><i>conservation projects.</i></p> <p><i>The unification of all these elements into the North Downs National Park would at once create an identity, a sense of a wider community, to which all who live and work in the area can belong.'</i></p>	
Formal request for a public inquiry	<p>ANON-VUXE-WSKU-J <i>'As outlined, we formally request that the representations made are heard at a formal Public Inquiry.'</i></p> <p>ANON-VUXE-WEX6-J <i>'Given the severity of the potential impacts in respect of housing supply it is essential that the proposals are subject to a full Public Inquiry.'</i></p> <p>ANON-VUXE-WSKP-D <i>'[Anon] understands that Natural England are required to pass on any unresolved objections to the Secretary of State (SoS) who may, but need not necessarily, hold a Public Inquiry to consider them. [Anon] requests that a Public Inquiry is held by the SoS for DEFRA following the Natural England boundary review process and any potential Legal Order. Surrey has a highly political background with a constrained landscape as a result of Green Belt and AONB designations with high housing numbers/ employment and growth targets given its proximity to London. There is no doubt multiple interests in the potential for any landscape inclusions and land pressures in the county are considerably high. Therefore, [Anon] requests that a Public Inquiry is certain and the potential Legal Order undergoes public scrutiny. The outcome would be the most robust solution.'</i></p>	<p><u>Commentary</u></p> <p>Natural England Guidance sets out at para 10.15 that <i>'In the case of National Parks, if there are objections from a statutory local authority which are not withdrawn prior to submission of the Orders, the Minister must hold a public inquiry. In this context 'local authority' does not include a parish council. The Minister may also hold a public inquiry or afford alternative ways to allow people to make further representations in any event. There is no equivalent statutory requirement for an inquiry for AONBs, but the Minister may still hold one under planning legislative powers, if so minded.'</i></p> <p>It is therefore at the Minister's discretion as to whether to call a public inquiry and on the basis that a Statutory Consultee has an outstanding objection.</p>

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	<p>ANON-VUXE-WS1G-A</p> <p><i>'It is therefore essential that any proposal to increase the boundaries of the Surrey Hills AONB is robustly evidenced and publicly scrutinised in the appropriate manner to ensure that the decisions that are made are done so in the best interests of the wider planning and growth ambitions of the area and the government. [Anon] considers that this scrutiny can only be achieved through a public inquiry, held by the Secretary of State into the proposals for the Surrey Hills AONB boundary extensions, at which all objections to the proposals can be robustly tested and an effective solution achieved.'</i></p>	