Appendix 4: Hog's Back

Please refer to Figure 14a

Overview

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

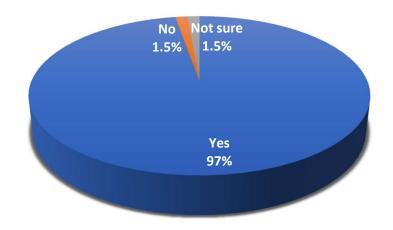
Natural Beauty	Responses
Yes	216
No	3
Not sure	3

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.

Hog's 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.

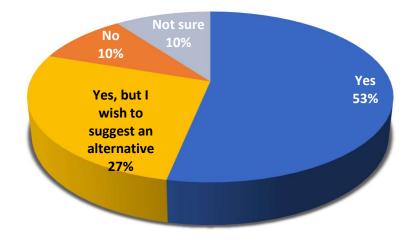
The additional areas of land that respondents wish to see included within the proposed extension are:

- 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

Hog's Back - Agreement with the proposed boundary



<u>Theme</u>	Representations	Natural England Commentary
The proposed extension meets the Natural Beauty Criterion	Representations Agreement ANON-VUXE-W5UR-U (Surrey County Council) 'Surrey County Council Supports all the proposed extension/refinement areas being designated as part of the Surrey Hills AONB/National Landscape.' ANON-VUXE-WSK2-F (Guildford Borough Council) '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: • Hog's Back – Fig 14 • Binscombe Hills and Wey Valley, Farley Hill – Fig 15 • Cranleigh Waters – Fig 17 • Hatchlands and East Clandon – Fig 18' ANON-VUXE-WEEH-H 'Landscape and scenic aspects are beautiful.' ANON-VUXE-WEZR-G 'It is beautiful' ANON-VUXE-WECY-Z 'The area has great beauty'	Natural England Commentary Commentary 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. Natural England has also taken account of detailed responses requesting changes to the boundary and proposes some amendments. These are set out below.
	ANON-VUXE-WEHY-5 <i>'I have enjoyed walking through this area many times - it IS beautiful in all seasons.'</i>	
	ANON-VUXE-WEY6-K 'The Hogs back is distinctive landscape that is unique to the area.'	
	ANON-VUXE-WET1-9	

<u>ieme</u>	Representations	Natural England Commentary
	'Views alone are outstanding'	
	ANON-VUXE-WMXR-P	
	'unique landscape'	
	ANON-VUXE-WE9A-X	
	'The Hogs Back is unique.'	
	ANON-VUXE-WEZ6-M	
	'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'	
	ANON-VUXE-WE9B-Y	
	'Wonderfully natural, sweeping picturesque landscape which must be preserved at all cost for future generations to appreciate and feel at	
	ease in.'	
	ANON-VUXE-WMNQ-B	
	'It's one of the highest ridges in the south of England with incredible views north and South.'	
	ANON-VUXE-WESY-G 'Amazing views north from the slopes of the Hogs Back to cover the	
	northwest Surrey area. Home to historic hop growing and farming.'	
	ANON-VUXE-WEQS-8	
	'Stunning rolling hills, views for miles, from the top of the Hogs Back.'	
	ANON-VUXE-WEZR-G	

<u>heme</u>	Representations	Natural England Commentary
	'Rolling hills with lush green land and some forestry'	
	ANON-VUXE-WM6Y-U '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).'	
	ANON-VUXE-WENZ-C '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.'	
	ANON-VUXE-WEWY-M 'It contains a number of extensive areas of ancient woodland, natural springs, settlements and farmland which provide high landscape and scenic qualities. Especially when see from the top of the Hog's Back.'	
	ANON-VUXE-WEEK-M '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.'	
	ANON-VUXE-WMNQ-B	

Natural Beauty		
<u>Theme</u>	Representations	Natural England Commentary
	'For years the Hogs back has been farmland with a diversity of wildlife.'	
	ANON-VUXE-WEF9-3 'This area is rich in natural history and should be protected'	
	ANON-VUXE-WM6Y-U 'The varied landscape supports a wide variety of wild plants and animals.	
	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).	
	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.	
	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).'	
	ANON-VUXE-WENZ-C '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	

Natural Bea	Natural Beauty		
Theme	Representations	Natural England Commentary	
	wildlife, which adds to the natural beauty and enhances the enjoyment of the area.'		
	ANON-VUXE-W5S7-X '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.'		
	ANON-VUXE-WEZ9-Q '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.'		
	ANON-VUXE-WESY-G 'Home to historic hop growing and farming.'		
	ANON-VUXE-WEC6-W '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.'		
The proposed	ANON-VUXE-W5T8-Z, ANON-VUXE-WEDX-Z and ANON-VUXE-	<u>Commentary</u>	
extension does not meet the Natural Beauty	WMWH-B considered the area to not meet the Natural Beauty Criterion, although no justification was given.	Natural England does not agree that the proposed Extension Area lacks natural beauty.	
Criterion	ANON-VUXE-WS1T-Q considered the margins of the area do not warrant designation and that the boundary has not been drawn conservatively.	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	

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

Boundary		
Theme	Representation	Natural England Commentary
General agreement with proposed boundary	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: ANON-VUXE-WSK2-F (Guildford Borough Council) '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.' ANON-VUXE-WSRX-V [Anon] fully supports Natural England's proposed boundary change, as shown in map ref: Fig 14 (the Hogs Back)' ANON-VUXE-WSXB-E 'It is clear that a very good assessment has been made in order to arrive at a sensible and achievable designated area.' ANON-VUXE-WE9B-Y 'It seems a reasonable boundary, considering the studies done to extend the AONB.' ANON-VUXE-WE5J-3 '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	Commentary Natural England notes the support for the proposed boundary and has provided a detailed commentary to the boundary issues raised b other respondents, which can be found below.

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
	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.'	
	ANON-VUXE-WM6Y-U 'The extension north stops at the edge of urbanised areas and smaller groups of housing, which is entirely logical.'	
	ANON-VUXE-WEP7-B 'Takes account of natural boundaries in the landscape rather that other influences and as such needs the test of AONB by reference to other local AONB and maintains consistency.'	
	ANON-VUXE-WE92-F 'Logical given roads and properties.'	
	ANON-VUXE-WEZS-H 'the area proposed represents a good compromise.'	
Request for Ad	Iditional Areas	
Inclusion of additional land west of White Lane to The Street and north of Poyle Road	A significant number of respondents requested additional land to the west of White Lane to The Street and north of Poyle Road including: 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-	Commentary 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.
	VUXE-WECY-Z, ANON-VUXE-WECS-T, ANON-VUXE-WE83-F, ANON-VUXE-WEB2-R, ANON-VUXE-WEPQ-5, ANON-VUXE-	Extent to which Natural Beauty Criterion is met

Boundary		
Theme	Representation	Natural England Commentary
	WEEW-Z, ANON-VUXE-WEGK-P, ANON-VUXE-WEC6-W, ANON- VUXE-WEMR-3, ANON-VUXE-W5UA-A Reason given include: Natural Beauty	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.
	 Beautiful part of England's green and pleasant land Amazing flora and fauna of the areathe wildflower meadows which are such an important source of nectar for the endangered beesthe families of deer which are visible most daysthe Red Kites which soar effortlessly above the meadowsthe 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. 	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 Hog's 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. 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). 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)

Boundary		
Theme Re	epresentation_	Natural England Commentary
	 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 Hog's 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 Hog's Back. 	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. 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. 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.

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
	 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. 	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. Protection of area from Development 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. The proposed extension on the northside of the Hog's 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 Hog's 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.

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
	 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 	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. Access and wellbeing and nature networks 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
	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.	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.
	 Designation would assist this objective of conserving and enhancing the Hog's Back ensuring both sides of the Hog's Back ridge are protected and a consistently protected area towards the Farnham end of the A31. 	Boundary 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.
	 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. 	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 giver the nature of the urban edge and land uses, as noted above.
	 Last bit of greenery left that sits between the village and the A31 Hog's Back - without protection it will be houses within a matter of time. 	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

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
	 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. 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. Some suggested minor boundary refinements to address anomalies where the current AONB does not follow a clear feature on the ground. 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.	 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. 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. 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. (Addition 1 – Refer to Figure 14a)

Boundary	Boundary		
<u>Theme</u>	Representation	Natural England Commentary	
Include land east of Ash Green, including Week Wood and Highfield Copse	 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. ANON-VUXE-WEZH-6 requested the inclusion of Week Wood and Highfield Copse to the north of Green Lane East. Reasons include: 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. 	Commentary 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. 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 'Urban fringes on the margins of settlement within and around woodland areas has caused some fragmentation and will require particular scrutiny at the boundary setting stage e.g. along Ash Green Lane East.' The Boundary Considerations Report states on page 13 that '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.' 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 pases through Kiln Copse and the distinctive coppice stools of Highfield Copse, overall, the area lacks the qualities of land to the south. Conclusion	

Boundary		
Theme	Representation	Natural England Commentary
		No change.
Inclusion of settlements of Tongham and Ash Green	 ANON-VUXE-W5XT-Z and ANON-VUXE-WEGB-D requested the inclusion of the settlements of Tongham and Ash Green. Reason given include: 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. 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. 	Commentary 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). 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 'have been excluded in their entirety due to the character and nature of these settlements, extent of modern development and because they are not surrounded by qualifying land.' 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. 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

Boundary		
Theme	Representation	Natural England Commentary
Include land north of the railway	 ANON-VUXE-WEZ9-Q requested the inclusion of land north of the railway. Reasons given include: 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. The landscape is open and sweeping. I can see there could be a problem with the AONB being a bit fragmented. 	relationship to the adjoining landscape (as set out in Natural England Guidance). Natural England maintains the view that the settlements at Tongham and Ash green should be excluded. <u>Conclusion</u> No change. <u>Commentary</u> 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 lesser quality land (page 48 of the Natural Beauty Assessment Report). 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. <u>Conclusion</u> No change.
Include land east of Flexford	ANON-VUXE-WEM1-2 requested inclusion of land east of Flexford Reasons include:	Commentary Natural England acknowledges the presence of a minor watercourse along the track leading to Chimney Farm and the cultural association
	 Spring streams and ponds to the west side of Flexford Road as it turns north towards Chimney Farmand the railway line – 	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

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
	 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". 	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.
		<u>Conclusion</u> Minor deletion to exclude more modern housing on edge of Flexford. (Deletion 3 – Refer to Figure 14a)
Include Backside Common south of the Railway Line as far as Wildfields Farm	 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. ANON-VUXE-WEMD-N requested the inclusion of Backside and Broadstreet Commons SNCI and referenced the importance of these woods for locally scare 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. 	Commentary 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. When drawing a boundary within areas of transition Natural England Guidance (Appendix 4) states that 'the boundary chosen should be an easily identifiable featureThe boundary should be drawn towards the high-quality end of the transitionvisual associations may also be used to help define the extent of land for inclusion' The Boundary Considerations Report notes at page 13 that '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.'

Boundary		
Theme	Representation	Natural England Commentary
		Natural England acknowledges that Natural England Guidance on boundary considerations (Appendix 4) also states that 'areas and features ofvaluewhich are situated on the marginsshould be included where practicable providing that they are situated within a tract that meets the statutory criteria.' The Boundary Report acknowledges at page 14 that '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.'
		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)
		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.
		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.
		<u>Conclusion</u> No change.
Include Manor Copse and	ANON-VUXE-WEAY-X requested the inclusion of Manor Copse and Strawberry Grove.	Commentary
Strawberry Grove	Reason include:	The Natural Beauty Assessment Report noted Strawberry Grove and Manor Copse as comprising areas of recent mixed plantation, with

Boundary		
Theme	Representation	Natural England Commentary
	 Small conifer plantation but predominantly constitutes mature native deciduous trees and associated flora- bluebells, early purple orchids Diverse hedgerow species including bullace and spindle. Extending north to the railway line would include mature woodland of Wildfield Copse, and in particular Backside Common which has some splendid old trees. 	some mature oak stands. It also noted that '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 dating back to Henry II. However, these features do not make a significant contribution to natural beauty.' These areas were found to sit on the margins of the Candidate Area. 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 'there are a number of SNCI woodlands associated with Backside/Broadstreet Common, however these heve 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.' As a result, these woodlands are not proposed for designation as AONB. Conclusion No change.

Boundary		
latural England Commentary		
Commentary Poubt regarding Guildford Plan Allocations The allocation to the southwest of Guildford for housing and roposed access currently remains within the adopted Local Plan. Their allocation has led to these areas being excluded from the roposed boundary extension in accordance with Natural England Buidance. The exclusion of 5 fields is a result not just of the allocation but also f the need to follow a clear feature on the ground. The Boundary assessment at page 14 noted that ' <i>At Down Place consideration was iven to adopting the edge of the Blackwell Farm allocation.</i> However, this was not marked by a clear feature on the ground. A fecision was therefore made to take the boundary further west and long the track and public right of way, west of Down Place. This nabled the boundary to follow a clear line on the ground while also xcluding the allocated site in its entirety.' Itatural England recognise that there is some doubt over the basibility of access arrangements to the Blackwell Farm allocation ite. Nevertheless, there has been no change in the status of this and in terms of its allocation within the Local Plan. There are also no etailed design proposals for the access road. Natural England border considers that it remains appropriate to exclude this land com the proposed boundary extension. It is and in terms of its allocation within the Local Plan. There are also no etailed design proposals for the access road. Natural England border being made and issued to the Secretary of State, then the efinition of the boundary in this area should be reviewed. Review solar farm application		
interior int		

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
	 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 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. 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: Solar development is temporary – 30 years Various assessments have all concluded that this land merits designation as AONB. 	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. 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. 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. Conclusion No change.

Boundary			
Theme	Representation	Natural England Commentary	
Include Sutton Place Park, Sutton Green and Wey Floodplain	 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. Reasons given include: 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. Scheduled monument Old Manor House at the site of St. Edward's Roman Catholic church. St. Edward's Roman Catholic church. St. Edward's Roman Catholic 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 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. 	Commentary 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. Conclusion No change.	

Boundary			
<u>Theme</u>	Representation	Natural England Commentary	
	 The Wey floodplain is a Riverside Park which connects to Burpham Court Farm and then Sutton Place. Water meadow landscape. 		
Request for Ex	clusion of Areas		
Exclude land at Wildfield Copse	 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. Reasons for excluding land at Wildfield Copse include: Lack of evidence from the HDA to justify the inclusion of this land for designation. 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. 	CommentaryNatural 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.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 	

Boundary			
<u>Theme</u>	Representation	Natural England Commentary	
		Considerations Report provides the rational for the boundary extending as far as the edge of Backside Common.	
		The Boundary Considerations Assessment notes at page 14 '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 Wildlfield Copse, whilst excluding land which was less visually or physically connected and of lesser quality.'	
		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 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 Wildlfield 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.	
		<u>Conclusion</u> No change.	