



Surrey Hills Area of Outstanding Natural Beauty Boundary Variation Project

Consultation Analysis Report

**Final Report
July 2024**

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1 Introduction

1.1 Scope of Work

- 1.1.1 Natural England is currently considering whether certain areas adjacent to the Surrey Hills National Landscape (formerly named Area of Outstanding Natural Beauty) should be designated. Areas of Outstanding Natural Beauty were recently rebranded as National Landscapes; however, when designating, Natural England still legally designates an Area of Outstanding Natural Beauty. To avoid confusion, this document thus refers to Areas of Outstanding Natural Beauty, or AONBs, throughout. If additional land is subsequently designated, then it would be branded as part of the Surrey Hills National Landscape.
- 1.1.2 In February 2023, Natural England approved the formal technical assessments which detail areas that meet the statutory criterion for designation as an Area of Outstanding Natural Beauty, whether the designation of this land is desirable for the purpose of conserving and enhancing its natural beauty, and where the proposed boundary should be drawn. Natural England also approved proceeding to the Statutory Consultation stage of the designation process.
- 1.1.3 Natural England is required by statute (Part IV, Section 83 of The Countryside and Rights of Way Act 2000) to consult every local authority whose area includes any land proposed for designation, prior to making an Order to designate land as an Area of Outstanding Natural Beauty. The legislation also states that, for AONB designation, the relevant local authorities are the principal tier of local authorities; namely the County, District and Borough Councils within the existing AONB or the proposed Extension Areas.
- 1.1.4 Natural England published its proposals and started the consultation process on 7 March 2023. The consultation ran for three months, closing on 13 June 2023.

2 Statutory Consultation Process

2.1 Engagement Prior to Statutory Consultation

- 2.1.1 In order to promote a collaborative approach to the designation process, Natural England established a Management Advisory Group (MAG), comprising representatives from Natural England, the Surrey Hills National Landscape (AONB) unit and Board, and a Technical Advisory Group (TAG), comprising Natural England representatives and local authority planning officers, to advise and provide evidence throughout the technical and evaluation process. All principal local authorities (those with land in the proposed extensions and those with land in the existing Area of Outstanding Natural Beauty), were invited to join the TAG, alongside 2 non-principal local authorities, due to their proximity to the existing AONB: Epsom and Ewell Borough Council and East Hampshire District Council.
- 2.1.2 An informal early engagement was also undertaken involving a public ‘call for evidence’, which Natural England undertook with the aim of providing an opportunity for all interested parties to submit evidence for consideration within the Natural Beauty Assessment. This ran from December 2021 – January 2022 and provided a significant body of evidence which was used to inform the evaluation process.

2.2 Statutory & Public Consultation on the Proposed Extension Areas

- 2.2.1 The objective of the Statutory Consultation is to seek opinions and evidence about the proposed extensions to the Surrey Hills Area of Outstanding Natural Beauty from all the relevant Statutory Consultees.
- 2.2.2 Letters were sent to each relevant statutory local authority, seeking formal organisational responses to the consultation. These were; Surrey County Council, the Greater London Authority, Croydon Borough Council, Guildford Borough Council, Mole Valley Borough Council, Reigate and Banstead Borough Council, Tandridge Borough Council and Waverley Borough Council. In addition, consultation letters were sent to the following non-statutory local authorities due to their proximity to the proposed extension areas: East Hampshire District Council and Sevenoaks District Council.
- 2.2.3 Cabinet Office Guidance on Community Engagement recommends that communities and groups, which may be affected by policies and projects, should also be consulted. In line with national good practice, it was decided to combine the Statutory Consultation with wider public consultation to include a wide range of local stakeholders including parish councils, local landowners and businesses, and the wider public. In recognition of the national status of AONB designation, relevant national organisations were also invited to respond to the consultation.

- 2.2.4 The approach adopted to achieve this wider engagement was informed by an Equality Impact Assessment, which was carried out by Natural England. The consultation aimed to seek the views of a wide range of other stakeholders, including the communities who live, work, visit, or otherwise have an interest in, or near, the areas under consideration. An engagement process was developed which aimed to ensure people had an opportunity to discuss issues with relevant Natural England staff and have access to information which was simple to understand and as inclusive as possible.
- 2.2.5 A range of methods were used in order to encourage as wide a response as possible. Pre-launch of the consultation activities included:
- Four general public pre-launch webinars to raise awareness of the consultation
 - Pre-launch briefing meetings with Lead Councillors and TAG and Members of the Surrey Planning Officers Association (SPOA), also to raise awareness
 - Presentation to the Surrey Hills AONB Board
- 2.2.6 Post launch of the consultation activities included:
- meeting with Surrey Hills AONB Board
 - two briefings for Parish Councils
 - three briefings for local authority Members and CEOs, NFU and CLA, and special interest groups
 - four daytime drop-in sessions for the general public (one in Leatherhead, two in Guildford and one in Caterham) providing an opportunity for local people to discuss the proposals on a one-to-one basis with Natural England officers
 - two evening drop-in sessions for the general public (Caterham and Godalming) providing an opportunity for local people to discuss the proposals on a one-to-one basis with Natural England officers.
- 2.2.7 Large scale (A1 and A3) maps of the proposed Extension Areas and copies of the technical assessments were made available for information at all the meetings.
- 2.2.8 Furthermore, a set of the technical reports and consultation documents was deposited at three Natural England Offices in Reading, Hampshire and Worcester as well as the Surrey Hills AONB offices at Warren Farm Barns. A full set of documents was also placed in local libraries at Guildford, Dorking, Redhill, Oxted, Godalming, Croydon, Petersfield, and Sevenoaks. Hard copies of all documents were also made available at local authority offices including Guildford Borough Council, Mole Valley District Council, Reigate & Banstead Borough Council, Tandridge District Council, Waverley Borough Council, Croydon Borough Council, East Hampshire District Council and Sevenoaks District Council.

2.2.9 A dedicated project mailbox was set up by Natural England, at SurreyHillsAONBboundaryreview@naturalengland.org.uk, where anyone could submit general enquiries about the consultation process and request project updates.

2.3 Consultation Method

2.3.1 A range of background information was made available which included:

- a factsheet
- a plain English Consultation Document outlining the project and designation process
- a set of maps showing the proposed extensions.

2.3.2 In addition, more detailed information was made available for those requiring more technical information. This included the following documents:

- The Natural England Guidance for assessing landscapes for designation as National Park or AONB in England (hereafter referred to as the Natural England Guidance).
- The Natural Beauty Assessment Report (February 2023).
- The Desirability Assessment Report (February 2023).
- The Boundary Considerations Report (February 2023).

2.3.3 A questionnaire was devised to elicit structured responses about the different stages of the technical assessment and evaluation process, as well as about the proposed boundaries for each of the three proposed extensions. The questionnaire included both open and closed questions in order to obtain simple quantitative data and more detailed supporting evidence that we could take into consideration. For each of the proposed extensions the following questions were posed:

- Does this area have sufficient natural beauty to be designated as an Area of Outstanding Natural Beauty?
- Is it desirable to designate this area as an Area of Outstanding Natural Beauty due to its natural beauty?
- Is the proposed boundary appropriate?

2.3.4 The questionnaire also requested respondents to provide basic information about themselves to obtain an understanding of their location and whether they were representing an organisation. It also enabled diversity monitoring. Space was also provided for respondents to supply any additional information that they felt to be relevant.

2.3.5 Consultees were given the opportunity to submit questionnaire responses either online, or by completing and returning a printed questionnaire. Responses by letter or email were also accepted. The online questionnaire was hosted on Defra's 'Citizen-Space' consultation portal and online responses were encouraged.

- 2.3.6 In recognition of accessibility issues, the documents listed above were, however, also made available as printed documents on request. In addition, the locations of all of the technical reports on deposit were advertised through Defra's 'Citizen-Space' portal, as were the locations and timings of all of the public drop-in events.
- 2.3.7 Statutory and other Consultees were informed of the consultation by letter. A comprehensive database was set up to manage the consultation process and include details of the statutory local authority consultees; elected members, Parish Councils; Surrey Hills AONB Partnership members; local businesses, farming, amenity and recreation groups, and community organisations. A range of other national organisations were also informed by letter, as well as MPs with constituencies with land in, or adjacent to, the existing AONB or the proposed extension areas. In addition to the initial consultation letter, follow up emails were also sent to all consultees on the database shortly before the deadline for responses.
- 2.3.8 A communications plan was produced and the consultation was promoted through a wide range of media. A press release resulted in local coverage in newspapers, on radio and on TV.

3 Analysis of Responses and Presentation of Results

3.1 How analysis has been undertaken

- 3.1.1 Evidence submitted during the consultation was gathered into a single excel database and sorted by geographical Extension Area. Any e-mail or letter responses were also integrated into this single database.
- 3.1.2 Evidence received within 1 week of the consultation closing were added to the database. If evidence was received after this time, it was considered by the reviewing team, but not added to the database or shown within the statistical analysis contained in this report.
- 3.1.3 The database was interrogated in order to determine the number of responses received and to understand the level of support for, or objection to, designation and whether it was desirable for areas to be designed and/or if respondents agreed with the boundary.
- 3.1.4 For each Extension Area, responses were exported into a standard form format, printed and filed in three lever arch files. Where respondents provided additional documents, including maps showing alternative boundaries, they were printed and collated with the relevant form and also stored in the lever arch files.
- 3.1.5 Each Extension Area was then reviewed and responses ordered into a series of common themes. These included support for, or evidence against, the Natural Beauty Criterion being met in each Extension Area, different reasons for the desirability to designate, or not designate, as well as grouping responses which requested the same or similar amendments to the boundary. Some respondents also commented on the method and approach used and these were also drawn out and sorted into themes.
- 3.1.6 All evidence was reviewed. This review included revisiting past assessment and additional time in the field, especially where a review of the boundary was required.
- 3.1.7 Analysis tables were then prepared for Method and Approach, Desirability and also in relation to the natural beauty and boundary for each Extension Area and minor boundary refinements.
- 3.1.8 In some instances, respondents answered in relation to a specific Extension Area and submitted evidence for the inclusion of additional land. In some cases, the additional land related more closely to a different Extension Area. For example, evidence on Langley Vale and Banstead Heath were submitted as part of the Chipstead Valleys Extension Area when they more readily relate to the Headley Hills Extension Area and were originally considered in relation to Evaluation Area 7. Where this occurred, the response was relocated and collated with the most appropriate Extension Area for the purpose of analysis. Table 1 below sets out areas referred to by respondents

and where their responses have been relocated.

Table 1: Responses which were relocated to a different Extension Area for the purpose of analysis.

Area	Extension Area where response lodged	Evaluation Area where response relocated
Langley Vale	Chipstead Valleys	Headley Hills
Banstead and Walton Heath	Chipstead Valleys	Headley Hills
Wey Valley Eashing	Enton Hills	Binscombe Hills
Wey Valley, south of Guildford	Cranleigh Waters	Wey Valley, Farley Hill
Portnalls Road and A23	Chipstead Valleys	Happy Valley
Chaldon area	Caterham Woods	Happy Valley
Land within East Hampshire	Dockenfield Hills	Separate East Hampshire Assessment ¹

3.1.9 For some locations a number of identical responses were received. Examples include the Tongham area, The Bogs and Stoney Field (Oxted), South Godstone area, and the Dockenfield Hills southern boundary.

3.1.10 Some respondents replied to the consultation by submitting a separate detailed response which related to a number of different proposed Extension Areas or minor boundary refinements. Where this occurred, information was collated into the relevant analysis tables.

3.1.11 Some respondents completed the online survey form, answering the questions on natural beauty and desirability in the context of additional land they wished to see included, rather than in relation to the proposed Extension Area. In these instances, it was necessary to interpret the information provided, to ensure it was recorded in the correct location in the analysis tables.

3.2 Presentation of Statistics

3.2.1 Not all respondents answered the Response Form questions in the way they were intended to be answered. Because of this, the statistical analysis, which uses the number of responses received, should be considered in the context of the following caveats:

- The statistics only reflect those responses which were made using the

¹ Refer to para 8.1.4 below.

response form. Respondents who submitted detailed evidence and did not use the survey form are not reflected in the statistics.

- Not all respondents answered all questions on the Response Form.
- For question C1, no distinction has been made between responses relating to a proposed Extension Area and those which provide evidence relating to a suggested additional area.
- One respondent answered no to all questions on the Response Form for all proposed Extension Areas.

3.2.2 Given these caveats, the statistical analysis and numbers quoted should be taken to give a broad indication of levels of support or objection only.

3.3 Presentation of Written Response

3.3.1 The presentation of the results of the Statutory Consultation have been grouped into the following tables:

- Method and Approach
- Desirability Issues
- Individual tables for each Extension Area and the Minor Boundary Refinements.

3.3.2 The analysis of responses is presented in tabular form and arranged as three columns. The left-hand column identifies key themes, the middle column sets out specific points raised by respondent(s), while the right-hand column sets out Natural England's response and any proposed changes to the boundary.

3.3.3 Throughout the analysis tables, responses from Local Authority Consultees (i.e. County, District and Borough Councils) have been identified. Otherwise, all responses are anonymised and referred to with a unique reference. All responses are given equal weight.

3.3.4 In general, a record of the response made is given as a quoted extract; however, where a significant number of responses made similar points, the main reasons given are summarised. Where responses are especially detailed, the main points raised have also been summarised.

3.3.5 In using quoted extracts from responses, care has been taken to provide a sense of the number and range of responses received and therefore the weight and strength of views on specific issues. Whilst not all responses are quoted or mentioned individually, this does not mean they have been discounted and care has been taken to reflect all responses within the analysis. Natural England has endeavoured to take account of all responses which were submitted during the consultation.

3.4 Where to find information

3.4.1 The remaining sections of this report provide a summary of the results. The detailed analysis tables on which these summaries are based can be found in the relevant appendices which are bound separately.

3.4.2 The sections of the report are as follows:

Section 4: Overview of Results (Question B1)

Section 5: Overview of Method and Approach Responses

Section 6: Overview of Desirability Responses (Questions C3 and C4)

Section 7: Overview of Proposed Extension Area Responses (Questions C1 and C2, and Question C5).

4 Overview of Results (Question B1)

4.1 Summary

4.1.1 One thousand, five hundred and eighteen (1,518) consultation responses were received, of which the great majority (1,402) were received via the on-line Citizen Space questionnaire. A relatively small number of responses (116) were received as paper copies of the questionnaire or letter/e-mail responses.

4.2 Question B1: Boundary Extensions

4.2.1 Question B1 asked 'Do you think the proposed areas should be designated as part of the Surrey Hills AONB?' and gave four options:

- Yes
- Yes, but I wish to comment on the boundary
- No
- Don't feel able to comment.

4.2.2 This was a short tick box question in the Response Form. Respondents were able to tick as many boxes as they wished and therefore the numbers in support, or objecting to, each proposed Extension Area far exceed the total number of responses received during the consultation, as many ticked more than one box.

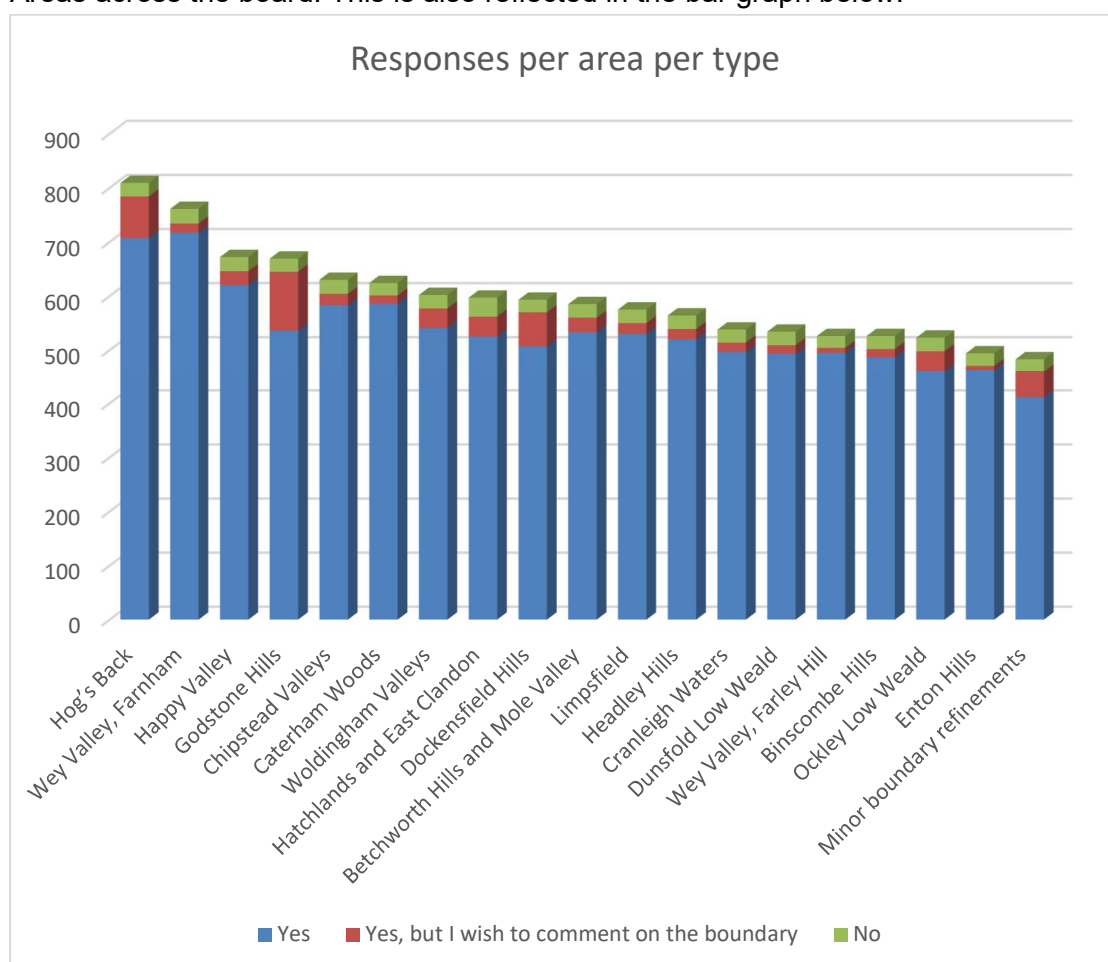
Table 2: The number of respondents per area who answered Question B1 with either yes, yes but I wish to comment on the boundary or no.

Proposed Extension Area	Question B1: Do you think the proposed areas should be designated as part of the Surrey Hills AONB?			
	Yes	Yes, but I wish to comment on the boundary	No	Total No. of Responses
Wey Valley, Farnham	94.2% (717)	2.2% (17)	3.5% (27)	761
Hog's Back	87.4% (707)	9.5% (77)	3.1% (25)	809
Binscombe Hills	92.6% (487)	2.9% (15)	4.6% (24)	526
Enton Hills	93.7% (463)	1.6% (8)	4.7% (23)	494
Wey Valley, Farley Hill	94.1% (495)	1.7% (9)	4.2% (22)	526
Cranleigh Waters	92.4% (497)	3.2% (17)	4.5% (24)	538
Hatchlands and East Clandon	87.9% (525)	6.2% (37)	5.9% (35)	597
Headley Hills	92.2% (520)	3.4% (19)	4.4% (25)	564
Chipstead Valleys	92.5% (583)	3.3% (21)	4.1% (26)	630
Happy Valley	92.3% (620)	3.9% (26)	3.9% (26)	672
Caterham Woods	93.9% (586)	2.4% (15)	3.7% (23)	624
Woldingham Valleys	89.9% (541)	6.0% (36)	4.2% (25)	602
Limpsfield	95.5% (530)	2.2% (20)	3.3% (25)	549
Godstone Hills	80.1% (536)	16.3% (109)	3.6% (24)	669

Proposed Extension Area	Question B1: Do you think the proposed areas should be designated as part of the Surrey Hills AONB?			
	Yes	Yes, but I wish to comment on the boundary	No	Total No. of Responses
Betchworth Hills and Mole Valley	91.1% (533)	4.6% (27)	4.3% (25)	585
Ockley Low Weald	88.1% (461)	7.1% (37)	4.8% (25)	523
Dunsfold Low Weald	92.3% (493)	3.0% (16)	4.7% (25)	534
Dockenfield Hills	85.5% (507)	10.6% (63)	3.9% (23)	593
Minor Boundary Refinements	85.1% (411)	10.1% (49)	4.8% (23)	483

4.2.3 The table above sets out the level of response to each proposed Extension Area and the minor boundary refinements. The figures are given as a percentage of the number of people who responded per area, excluding those who identified they were unable to comment, (with the actual number of responses shown in brackets).

4.2.4 These percentage figures show the high levels of support for the proposed Extension Areas across the board. This is also reflected in the bar graph below.



4.2.5 All of the Extension Areas and minor boundary refinements attracted respondents who wished to comment on the detailed boundary. Given this question was a tick box

response, and more detailed responses on the boundary were provided in relation to individual Extension Areas, the percentage of respondents wanting to comment on the boundary at Question B1, is not a true reflection of the numbers that actually did respond. An overview of the number of respondents wanting to comment on the boundary per area can be seen in the bar graph above. This illustrates that the Godstone Hills was an area which attracted a greater number of responses on the boundary. Detailed figures of respondents commenting on the boundary of individual Extension Areas can be found in the relevant analysis tables set out in Appendices 3 to 21.

- 4.2.6 The percentage of respondents who felt the Extension Areas should not be designated was less than 5% (with the exception of Hatchlands and East Clandon – 5.9%). Nevertheless, it is notable that of the 1,402 responses submitted directly through Citizen Space, there were consistently between 22 and 27 no responses for each of the proposed Extension Areas. Of these, 12 respondents answered no to all Extension Areas. These percentages do not take account of responses which were submitted without using the response form and, in these latter cases, the reasons given frequently related to desirability and are recorded in the detailed analysis table on desirability (Appendix 2).

4.3 Response of Statutory Consultees

- 4.3.1 Formal responses were received by the Statutory principal tier local authorities namely the County, District and Borough Councils within the existing Area of Outstanding Natural Beauty or the proposed Extension Areas.
- 4.3.2 A summary of their response is set out in Table 3 below and indicates a broad level of in principle support for the proposed Extension Areas and a desire to see more land designated. This is followed by Table 4 which shows all responses received from other local authorities.

Table 3: Summary of responses from Statutory Consultees

Local Authority	Details
Surrey County Council	Supportive Suggests additional land in five areas.
Guildford Borough Council	Fully Supportive Requests careful consideration of representations from local communities.
Waverley Borough Council	Fully supportive Requests careful consideration of representations from local communities.
Mole Valley District Council	Supportive Suggests additional land in eight areas.
Reigate & Banstead Borough Council	Supportive Suggests additional land in five areas.
Tandridge District Council	Supportive

Local Authority	Details
	Suggests additional land in six areas and minor boundary refinement.
Great London Authority	Did not submit a consultation response.
Croydon London Borough Council	Supportive Suggests an additional extension.

Table 4: Summary of responses from other Local Planning Authorities

Local Authority	Details
Epsom and Ewell Borough Council	Supportive of study and any land within the authority which might be proposed for inclusion by others.
East Hampshire District Council	Concern that consideration has not been given to land within East Hampshire.
City of London Corporation	Supportive of Farthing Downs area and Happy Valley extension.

- 4.3.3 During the consultation, a number of written responses were received by Members of Parliament. These have been reviewed and are reflected in the analysis tables although unlike Statutory Consultees, and in accordance with the handling of all other responses, they have not been named.

5 Overview of Method and Approach Responses

5.1 Analysis of comments on the consultation method

5.1.1 A number of respondents commented on the consultation process and method of natural beauty evaluation, and the definition of boundaries. Comments relating to the approach and method adopted are set out in detail in the corresponding analysis table (Appendix 1). The table is set out in relation to broad themes which emerged from an analysis of the responses. For some themes, there were both views in support and views which raised concern. Where this is the case, they are addressed under the same theme presenting responses in support first, followed by concerns.

5.1.2 The main themes relating to the method and approach include:

- Value of the Call for Evidence,
- Level of detailed evaluation,
- Level of detailed assessment,
- Definition and size of Evaluation Areas,
- Weight given to natural beauty factors,
- Views from transport infrastructure,
- Bigger, better and more joined up natural heritage,
- Role of historic parkland,
- Role of farming, golf course and equestrian uses,
- Relative nature of tranquillity and wildness,
- Boundary considerations,
- Insufficient use of Surrey Landscape Character Assessment,
- Mapping,
- Review should consider de-designation of land,
- Sites within the planning system should be excluded,
- Consideration of area as a National Park, and
- Need for a public inquiry.

5.1.3 Natural England acknowledges a number of factual errors within the main technical reports which have been brought to its attention by respondents. These errors will be corrected in the technical reports prior to the submission of the Designation Order to the Secretary of State. Natural England does not consider that these errors materially alter the judgements made during the technical assessment nor hamper respondent's ability to understand Natural England's assessment. In particular, Natural England notes the need for the existing Area of Outstanding Natural Beauty boundary, as depicted on 1:25,000 mapping, to be checked in detail against the existing 1958 Designation Order Map. This will be undertaken before the Designation Order is made, to ensure any proposed Extension Area boundary departs from, and joins to, the current Area of Outstanding Natural Beauty boundary at the correct location.

- 5.1.4 Natural England is also aware that during the period in which consultation responses have been reviewed, the status of potential development sites and current planning applications may have changed. Natural England has endeavoured to reflect the most up to date information at the time of writing and acknowledges the need to keep this under review as the designation process proceeds.
- 5.1.5 Overall Natural England is of the view that the approach adopted is in accordance with its published Guidance and the assessment is robust and defensible.

6 Overview of Desirability Responses (Questions C3 and C4)

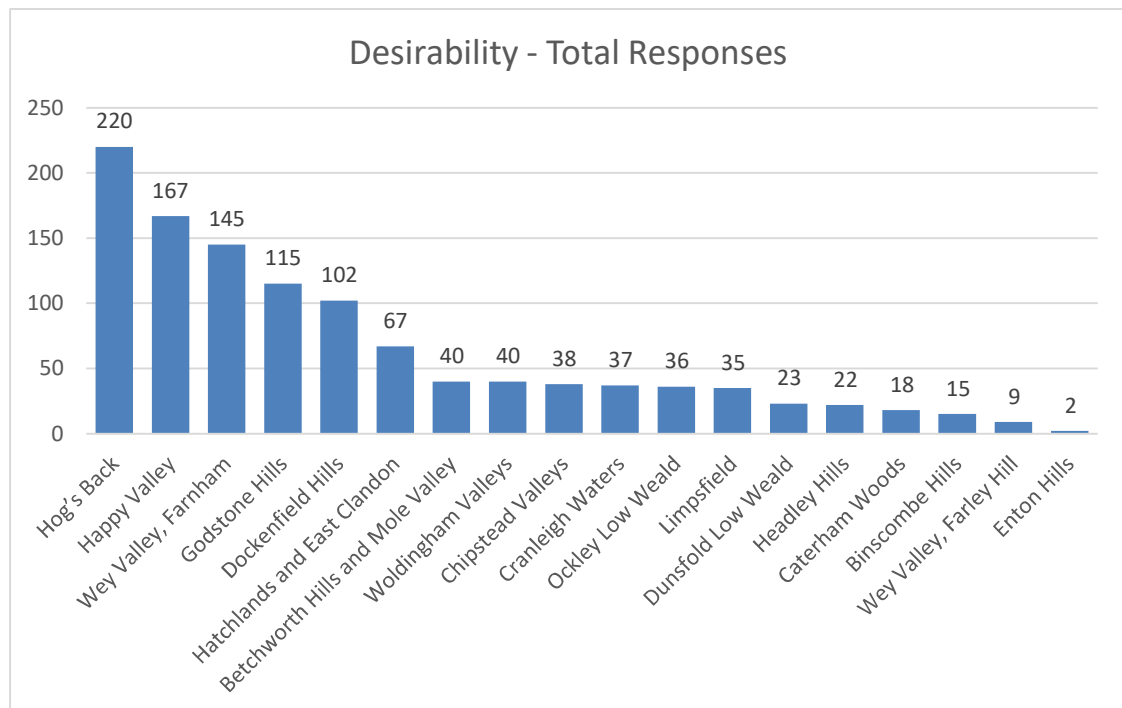
6.1 Introduction

6.1.1 A range of different responses relating to desirability were submitted by respondents. Overall, they fall into three broad categories:

- Firstly, general comments both for and against designating all of the proposed Extension Areas in principle;
- Secondly, specific comments both for and against designating a specific Extension Area;
- Thirdly, comments in support of designating a much wider area beyond the proposed Extension Areas.

6.1.2 The reasoning put forward in each of these categories was the same or similar. Therefore, it was concluded, in the interest of clarity and simplicity, to group all types of response into broad desirability themes. Where desirability arguments are put forward in relation to specific Extension Areas, they are noted in the relevant Evaluation Area analysis table with Natural England's response cross referenced to the detailed desirability table. This has avoided significant repetition and duplication in the analysis tables.

6.1.3 The number of desirability responses per Extension Area is depicted in the bar chart below.



6.2 Desirability Themes

6.2.1 The identified themes in support of designation of the proposed Extension Areas/wider areas, are as follows:

- Benefits from integrated management
- Benefits arising from additional resources
- Benefits from conservation and enhancement
- Benefits of improved access and visitor management
- Statutory protection in planning
- Proximity to centres of population and access
- Area of Greater Landscape Value (AGLV) status is uncertain and therefore should be designated as Area of Outstanding Natural Beauty
- Bringing in additional land to fulfil Government commitment to nature recovery and addressing climate change
- Bringing in additional land to improve access and wellbeing.

6.2.2 The identified themes against designation of the proposed Extension Areas either individually or in totality, are as follows:

- Current management of the land
- Areas are already protected in planning terms
- Increased regulations and restrictions
- Removal of permitted development rights
- Impact on housing supply
- Impact on the economy
- Impact on business
- Impact on agriculture
- Increased house prices.

6.3 Desirability in relation to the Extension Areas

6.3.1 Question C3 of the Statutory Consultation Response Form asked if it was desirable to designate a proposed Extension Area as and Area of Outstanding Natural Beauty. The result for each Extension Area is summarised in Table 5 below. Percentage figures are provided with the actual number of responses shown in brackets. As noted in paragraph 3.2.1 above, the statistics presented in the tables reflect responses using the response form. A number of separate and substantial responses were received from organisations (primarily from developers and land managers and their representative bodies) in relation to desirability and many objected to designation of the Extension Areas in principle. These are not reflected in the statistics given.

Table 5: Desirability to designate land in each proposed Extension Area.

Proposed Extension Area	Question C3: Is it desirable to designate this area as AONB?			
	Yes	No	Not Sure	Total number of responses
Wey Valley, Farnham	95% (138)	4% (6)	<1% (1)	145
Hog's Back	98% (215)	<1% (3)	<1% (2)	220
Binscombe Hills	93% (14)	7% (1)	0 (0)	15
Enton Hills	50% (1)	50% (1)	0 (0)	2
Wey Valley, Farley Hill	89% (8)	11% (1)	0 (0)	9
Cranleigh Waters	89% (33)	8% (3)	3% (1)	37
Hatchlands and East Clandon	79% (53)	19% (13)	2% (1)	67
Headley Hills	91% (20)	4.5% (1)	4.5% (1)	22
Chipstead Valleys	92% (35)	8% (3)	0 (0)	38
Happy Valley	98% (163)	1% (2)	1% (2)	167
Caterham Woods	89% (16)	5.5% (1)	5.5% (1)	18
Woldingham Valleys	92% (37)	5% (2)	3% (1)	40
Limpsfield	94% (33)	6% (2)	0 (0)	35
Godstone Hills	97% (112)	2% (2)	1% (1)	115
Betchworth Hills and Mole Valley	93% (37)	7% (3)	0 (0)	40
Ockley Low Weald	94% (34)	6% (2)	0 (0)	36
Dunsfold Low Weald	87% (20)	13% (3)	0 (0)	23
Dockenfield Hills	99% (101)	1% (1)	0 (0)	102

6.3.2 The majority of respondents who answered Question C3 agreed it was desirable to designate the proposed Extension Areas². The two areas attracting the highest number responses which considered it was desirable to designate, include Hogs Back (215 responses) and Happy Valley (163 responses). The area which received the highest number of respondents who answered no was Hatchlands and East Clandon (13 respondents) but even this area attracted a significant majority of support (53 respondents), with just 1 respondent being unsure.

6.3.3 These figures do not reflect the number of separate responses received which raised concerns regarding the designation of additional land as AONB, and these figures should therefore be viewed in this context. Natural England's response to concerns raised can be found in Appendix 2.

6.4 Format of Desirability Analysis Table

6.4.1 The desirability analysis in Appendix 2 is divided into two tables. The first table considers those reasons put forward **in support** of designation of the Extension Areas

² The majority of responses related to the proposed Extension Areas although some responses related to a desire to designate a much wider area.

and the second considers those reasons put forward **against** designation. In most cases desirability issues are set out as quotes related to individual respondents, however a number of respondents provided lengthy responses in the form of separate detailed submissions. Where necessary, and in the interest of succinctness, lengthy responses have been summarised or representative quotes used to illustrate points raised.

- 6.4.2 As set out in the Desirability Report (para 1.3.2) *‘the more directly or substantially a factor bears upon the achievement of the AONB purpose, the more weight Natural England will give it in the decision whether or not it is desirable to designate.’* For this reason, those themes which relate closely to the relevant desirability questions are set out first, with those which are considered less or not relevant following.

6.5 Conclusion

- 6.5.1 The Statutory Consultation has demonstrated a clear level of consensus, including from Statutory Consultees, with regard to the desirability of designating the proposed Extension Areas/minor boundary refinements collectively as a variation to the Surrey Hills National Landscape (AONB) for the purpose of conserving and enhancing the natural beauty of the area. However, it has also demonstrated a sizeable body of respondents who disagree with this conclusion either in relation to parts of the proposed extension or more fundamentally as an in-principle objection. Generally, respondents who put forward these latter views comprised organisations supporting the interests of local landowners and or businesses as well as individuals and developers.
- 6.5.2 Having considered all responses in detail, Natural England remains of the view that it is desirable for the purpose of conserving and enhancing the natural beauty of the area that collectively the proposed Extension Areas should be subject to an Order varying the boundary of the Surrey Hills National Landscape (AONB).

7 Overview of Proposed Extension Area Responses (Questions C1, C2 and C5)

7.1 Introduction

7.1.1 Part C of the Response Form allowed individuals or organisations to give detailed comments related to specific proposed Extension Areas. Both the paper and online forms allowed for this question to be missed completely, for just one proposed area to be commented on, or for multiple areas to be commented on by the same individual or organisation.

7.1.2 Part C of the Response Form was divided into three principal questions as follows:

- Question C1: Does the area have sufficient natural beauty to be designated as an Area of Outstanding Natural Beauty?
- Question C3: Is it desirable to designate this area as an Area of Outstanding Natural Beauty due to its natural beauty?
- Question C5: Do you agree with the proposed boundary of this extension?

7.1.3 Questions C2 and C4 allowed respondents to provide further information and give their reasoning for their view.

7.1.4 The respondents were provided with links to various, detailed, documents, maps and guidance to assist them in reaching their conclusions.

7.2 Presentation of Results

7.2.1 The responses for each area have been analysed in detail. As noted above in Section 6, answers to Questions C3 and C4 (desirability) related to broad themes and have been brought together in a single analysis table found in Appendix 2. Responses in relation to natural beauty and the boundary are considered in relation to each proposed Extension Area and are set out in Appendices 3 to 20. A separate natural beauty and boundary table is provided for each. Where necessary, and in the interest of succinctness, lengthy responses have been summarised or representative quotes used to illustrate points raised. Appendix 21 provides analysis of responses relating to the minor boundary refinements.

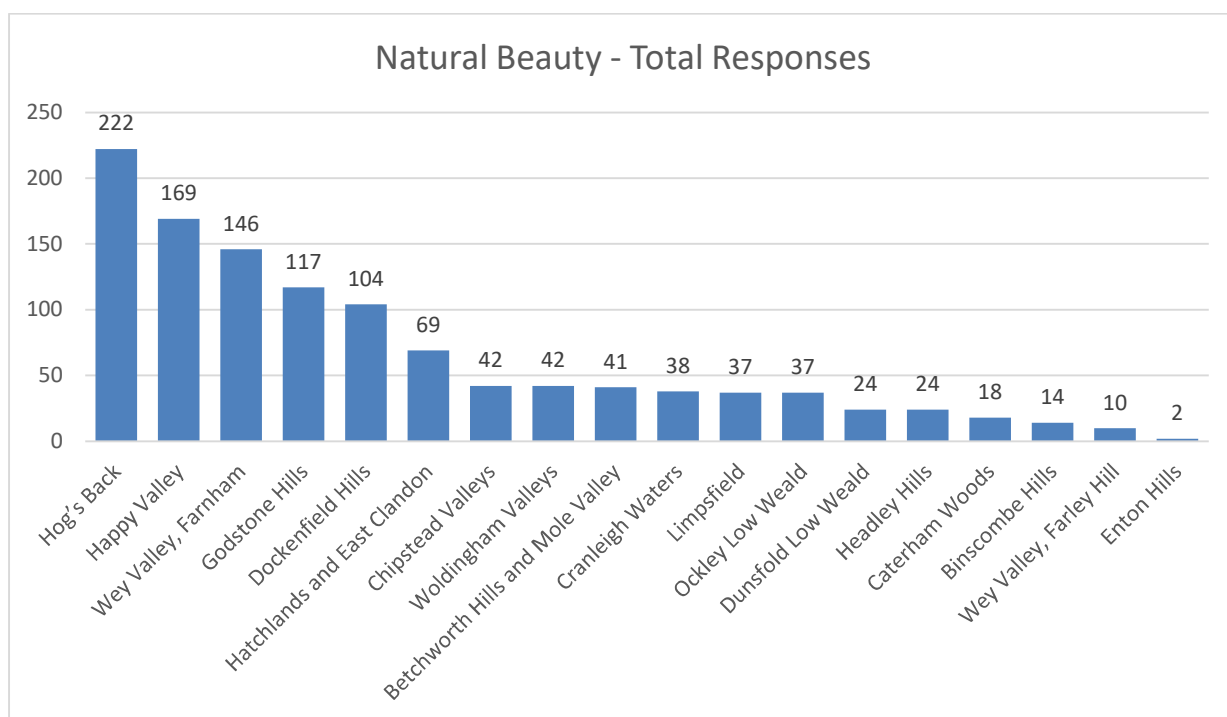
7.2.2 Where respondents have asked for the inclusion of additional land which is separate from and/or lies some distance beyond the proposed Extension Areas, this is considered in relation to the most relevant area. For example, the request to consider land at Langley Vale and Banstead Heath are discussed in relation to the Headly Hills Extension Area, as noted in Table 1 above.

7.2.3 Where respondents requested the inclusion or exclusion of land these cases are set out in the tables respectively. Where Natural England has concluded that the boundary should be amended to either include or delete land from the proposed

Extension Area, this is described in the tables and mapped on Figures 12a to 29a which can be found in Appendix 22. The numbering of the maps start at number 12 as they are based on the Statutory Consultation Boundary Maps 2023, which also start at 12.

7.3 Overview of Natural Beauty Responses per Extension Area

7.3.1 The number of natural beauty responses per Extension Area is depicted in the bar chart below and illustrates that the area which attracted the most number of responses was the Hog's Back.



7.3.2 This has been broken down into the number of responses answering yes, no and not sure, per Extension Area and shown in Table 6 below. Percentage figures are given with the actual number of responses shown in brackets.

Table 6: Sufficient natural beauty to be designated as AONB.

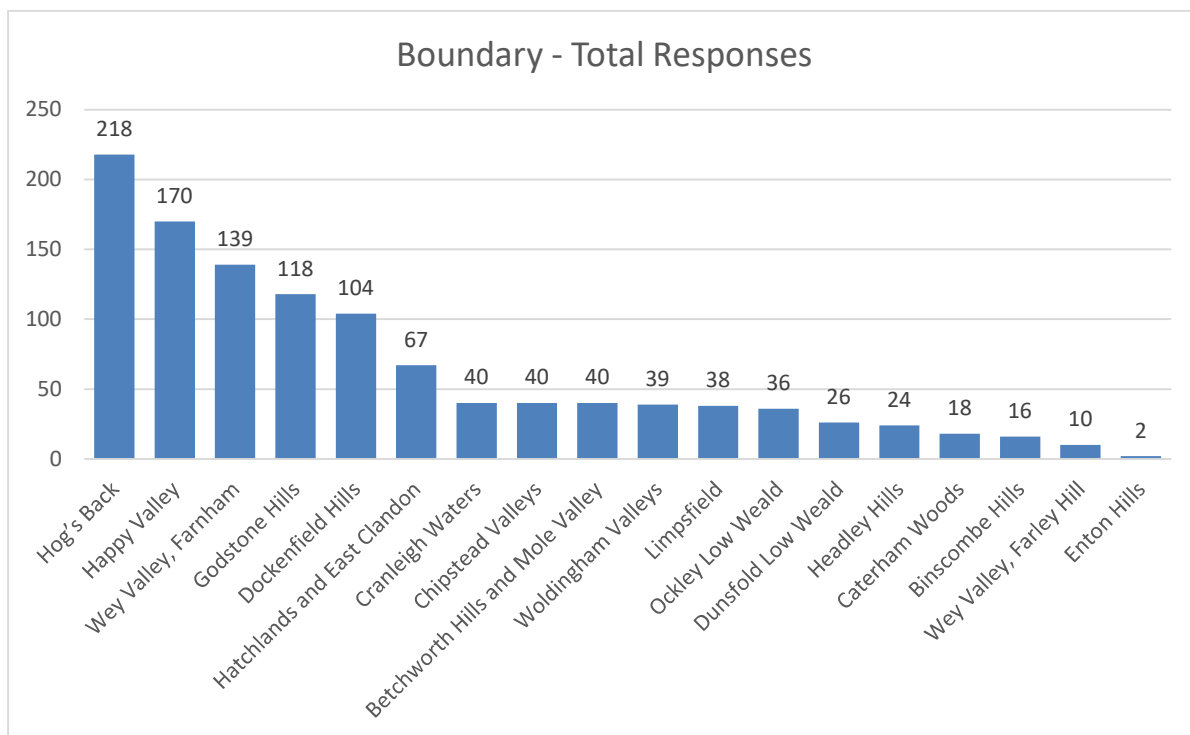
Proposed Extension Area	Question C1: Does the area have sufficient natural beauty to be designated as AONB?			
	Yes	No	Not Sure	Total number of responses
Wey Valley, Farnham	90% (132)	95% (13)	1% (1)	146
Hog's Back	97% (216)	1.5% (3)	1.5% (3)	222
Binscombe Hills	93% (13)	7% (1)	0 (0)	14
Enton Hills	50% (1)	50% (1)	0 (0)	2
Wey Valley, Farley Hill	90% (9)	10% (1)	0 (0)	10

Proposed Extension Area	Question C1: Does the area have sufficient natural beauty to be designated as AONB?			
	Yes	No	Not Sure	Total number of responses
Cranleigh Waters	92% (34)	8% (3)	0 (0)	37
Hatchlands and East Clandon	77% (53)	20% (14)	3% (2)	69
Headley Hills	96% (23)	4% (1)	0 (0)	24
Chipstead Valleys	95% (36)	5% (2)	0 (0)	38
Happy Valley	98% (166)	1% (1)	1% (2)	169
Caterham Woods	94% (17)	6% (1)	0 (0)	18
Woldingham Valleys	90% (38)	5% (2)	5% (2)	42
Limpsfield	95% (35)	5% (2)	0 (0)	37
Godstone Hills	98% (115)	2% (2)	0 (0)	117
Betchworth Hills and Mole Valley	90% (37)	10% (4)	0 (0)	41
Ockley Low Weald	95% (35)	5% (2)	0 (0)	37
Dunsfold Low Weald	87% (21)	13% (3)	0 (0)	24
Dockenfield Hills	99% (103)	1% (1)	0 (0)	104

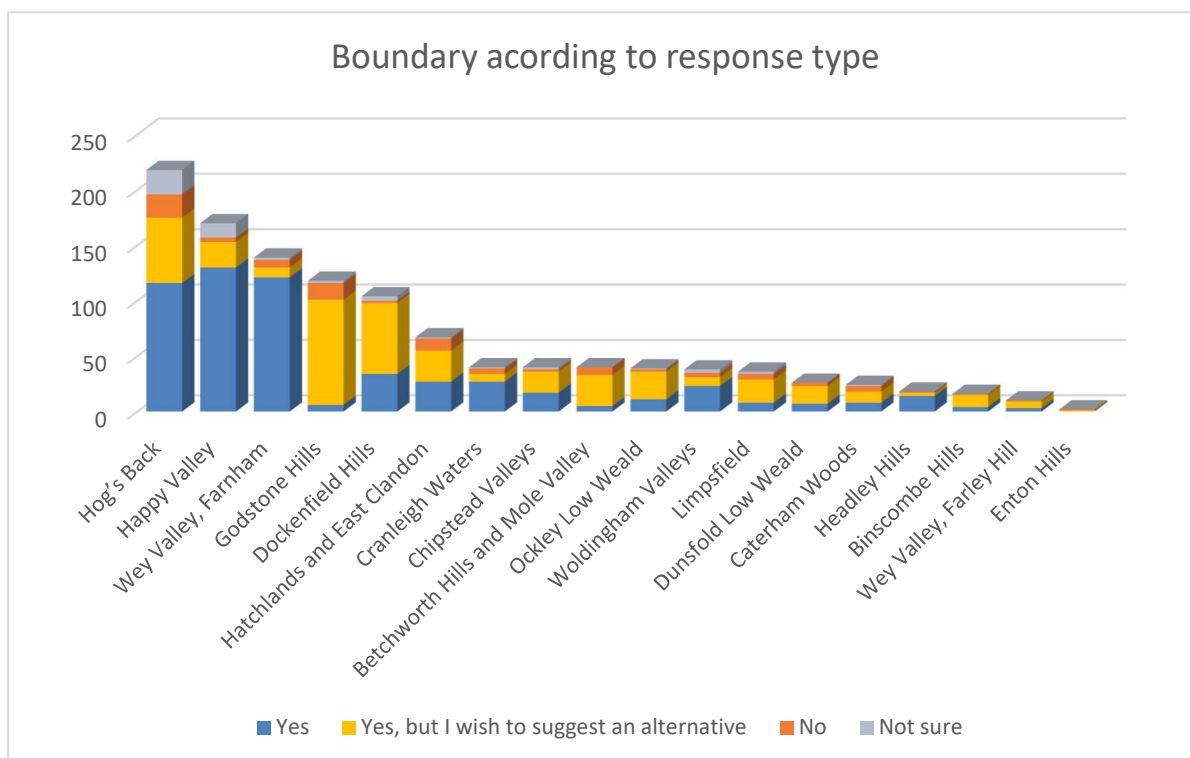
7.3.3 This table shows the significant level of support for the designation of the proposed Extension Areas. The two areas which attracted the greatest number of 'no' responses were Wey Valley, Farnham (13 responses) and Hatchlands and East Clandon (14 responses). The former related to concerns regarding the inclusion of areas of built development/planning appeal site and the latter related to the inclusion of the village of East Clandon and land adjacent to Blakes Lane.

7.4 Overview of Boundary Responses per Extension Area

7.4.1 The number of boundary responses per Extension Area is depicted in the bar chart below and illustrates that the area which attracted the most number of responses was the Hog's Back.



7.4.2 However, this can be further broken down into the different responses of yes, yes but I wish to suggest an alternative, no and not sure, and this reveals that the area attracting the largest number of responses requesting a change to the boundary is Godstone Hills. This is confirmed in the detailed analysis (Appendix 16) where there were the greatest number and variety of boundary options put forward.



7.5 Results of the Analysis of Boundary Responses

7.5.1 Having analysed all boundary responses for each of the Extension Areas, Natural England has concluded that the boundary should be adjusted in a number of locations. These boundary changes (additions and deletions) are summarised per Extension Area in the table below and are shown in the associated maps in Appendix 22. The largest amendment is that of Beddlestead Valley as part of the Woldingham Valleys Extension Area and the Extension Area with the greatest number of proposed amendments to the boundary is Ockley Low Weald.

Table 7: Proposed Boundary Additions and Deletions per Extension Area.

Extension Area	Additions and Deletions	Map Reference
Wey Valley, Farnham	Deletion 1: Land off Waverley Lane Deletion 2: Land at Rock House	13a
Hog's Back	Addition 1: Land at Tongham Deletion 3: Land north of West Flexford Farm	14a
Binscombe Hills	-	15a
Enton Hills	-	16a
Wey Valley, Farley Hill	-	15a
Cranleigh Waters	Deletion 4: Land at Drodges Close Addition 2: Land at Smithwood Common	17a
Hatchlands and East Clandon	Addition 3: Land at Guilford Golf Club SNCI Addition 4: Land at Upper Hammond Farm Addition 5: Land at West Horsley Place	18a
Headley Hills	Addition 6: Land at Beaverbrook	19a
Chipstead Valleys	Addition 7: Land at Hogden Bottom	20a
Happy Valley	Addition 8: Land west of Farthing Downs Addition 9: Land east of Farthing Downs Deletion 5: Land west of Coulston Common	21a
Caterham Woods	Deletion 6: Properties along Stanstead Road Deletion 7: Property east of Tupwood lane	21a
Woldingham Valleys	Addition 10: Western edge of Halliloo Valley Addition 11: Beddlestead Valley	22a
Limpsfield	Addition 12: Land south to Staffhurst Wood	23a
Godstone Hills	Addition 13: Land at The Bogs Addition 14: Land at Oxted Mill Deletion 8: Land north of New Road Deletion 9: Land south of South Park	23a and 24a

Extension Area	Additions and Deletions	Map Reference
Betchworth and Mole Valley	Addition 15: Land south of Colley Hill Addition 16: Land east of Shag Brook	25a
Ockley Low Weald	Addition 17: Land at Ockley Court SNCI Deletion 10: Land west of railway Addition 18: Land north of Vann Lake Road Addition 19: Land north of Pislely Lane Addition 20: Land west of Plough Lane Deletion 11: Land north of Thornhurst Brook Farm	26a
Dunsfold Low Weald	Addition 21: Land at Sayers Lane Addition 22: Land at Loxley Bridge Deletion 12: Land north of Chiddingfold Road	27a
Dockenfield Hills	Addition 23: Land south of Old Lane Addition 24: Land at Shortfield Common	29a
Minor Boundary Refinements	Addition 25: Land west of Dorking Addition 26: Land at Red Court Deletion 13: Land at Weydown Road Carpark Addition 27 Land west of Bunch Road	25a 28a 28a 28a

7.5.2 Where an addition or deletion is proposed, brief details of the revised boundary are provided in the analysis tables. Any proposed additions and deletions which are carried forward, will require the Technical Assessments to be updated prior to the submission of the Designation Order to the Secretary of State.

8 Conclusion

8.1 Summary of Results Analysis

- 8.1.1 Natural England has considered all of the consultation responses and analysed both quantitative and qualitative data in detail.
- 8.1.2 There was a significant majority of respondents in favour of designating the proposed Extension Areas. There were some dissenting voices, with objections largely from developers, business and land managers and their representative bodies, and concerns were principally related to matters of desirability.
- 8.1.3 Many respondents supplied additional evidence in support of their views, some very detailed, and Natural England has considered whether this evidence necessitated changes to any of the proposals and especially proposed boundaries. It has concluded that a number of changes should be made to both include more land and to delete some previously proposed areas. The most substantial addition is that of the Beddlestead Valley which was considered borderline in the previous evaluation work. Having reviewed the responses made during the Statutory Consultation, Natural England has concluded that this area should now be included in the proposed Extension Area of the Woldingham Valleys.
- 8.1.4 A further area of particular significance has been the request from some respondents to consider land within East Hampshire. This has required a new Evaluation Area to be defined and a detailed assessment to be undertaken.
- 8.1.5 Due to the additional land that is now being proposed as a result of the statutory and public consultation, Natural England has concluded that a second round of Statutory Consultation will be required to enable stakeholders to comment on Natural England's proposed boundary changes. This consultation will also provide an opportunity to comment on the technical assessment associated with land in East Hampshire.

8.2 Satisfying the Legislative Test

Natural England remains of the view that there is a clear weight of evidence that the areas within the proposed extensions meet the criterion of outstanding natural beauty required for AONB designation and that, where minor boundary refinements are required, they are appropriate. Taken together with the existing Surrey Hills National Landscape (AONB), they form 'an area of land' of outstanding natural beauty as required by the legislation. Natural England considers that the designation of these qualifying areas, which are contiguous with the existing Area of Outstanding Natural Beauty, is desirable and that the boundaries of each proposed Extension Area/minor boundary refinement are sufficiently robust and appropriate.