Appendix 21: Minor Boundary Refinements

Please refer to Figures 25a and 28a

Question B1: Should the Minor Boundary Refinements be designated as part of the Surrey Hills AONB?

Yes	411
Yes, but I wish to comment on the boundary	49
No	23

Of the 483 respondents who answered question B1, 411 (85%) felt that the Minor Boundary Refinements should be designated as part of the Surrey Hills AONB and 23 respondents (5%) did not. 49 respondents (10%) agreed but wished to comment on the boundary.

The table below considers each minor boundary refinement referred to by the respondents in its relevant geographical area, and are considered in the following order:

Guildford

Busbridge and Catteshall

Bookham

Oxted

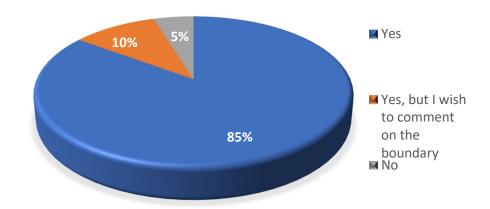
Dorking

Haslemere

Beacon Hill and Hindhead (formerly referred to as Grayshott)

Where minor boundary refinements were requested by respondents, but do not fall into the areas listed above, they have been considered in relation to the most relevant proposed Extension Area. For example, respondents who requested more land be included in the Godstone Area

MINOR BOUNDARY REFINEMENTS



(ANON-VUXE-WEXX-M and ANON-VUXE-WEU5-E) have been considered in the Godstone Extension Area Analysis Table (Appendix 16).

A further Minor Boundary Anomaly was raised during the Statutory Consultation namely Redhill Common, and this is addressed at the end of the table.

Guildford		
<u>Area</u>	Representations	Natural England Commentary
General Support	ANON-VUXE-WSK1-E and ANON-VUXE-WMEQ-2 support the inclusion of The Mount. ANON-VUXE-W53-Z, ANON-VUXE-WMAW-4, ANON-VUXE-WMG8-B, ANON-VUXE-W5GT-F and ANON-VUXE-WMZP-P support the inclusion of The Mount and Land South of Woodcote.	Commentary Natural England notes the support for the proposed boundary and has provided a detailed commentary to issues raised by respondents which can be found below.
Land South of Warren Road	ANON-VUXE-WSQA-4, ANON-VUXE-WSK1-E and ANON-VUXE-W5H4-G requested inclusion of Land South of Warren Road. Reasons include: • Existing AONB runs along property boundaries • Entry point into the AONB • Cowslips in the pastures • Public rights of way across the area.	Commentary This area was assessed as part of the Boundary Assessment Report (page 60) which concluded that 'This land has an urban fringe character comprising horse paddocks and is influenced by adjoining back gardens and curtilage fencing which affect its overall condition. This landscape relates more closely to the urban edge than wider countryside, and slopes towards the built edge. Although the current AONB does not follow a clear line on the ground, this land is not considered suitable for designation within the AONB.' As a result of this analysis no change was proposed to the boundary. Natural England has reviewed this in light of the evidence put forward by respondents. Natural England notes that the majority of the public right of way falls within the existing AONB designation. It also acknowledges that in some cases the AONB does extend up to the urban edge. In this instance, the land in question comprises small scale paddocks used for horse grazing. This land use, the separation of the land from the wider sweep of the AONB, and the sloping nature of the site towards the urban edge, has led Natural England to the same conclusion as previously given.

Guildford		
Area	Representations	Natural England Commentary
		Conclusion No change.
The Mount	ANON-VUXE-W53-Z, ANON-VUXE-WMAW-4, ANON-VUXE-WMG8-B, ANON-VUXE-W5GT-F and ANON-VUXE-WMZP-P ANON-VUXE-WSK1-E and ANON-VUXE-WMEQ-2 support the inclusion of The Mount. ANON-VUXE-W5US-V requested inclusion of the road which leads to the bridleway to the west of The Mount. Reasons include: • Would assist in protecting the edge and verge and bridleway character • Safeguarding the view north.	As noted on page 60 of the Boundary Report, the proposed boundary follows the southern edge of the lane known as the Mount. However, the proposed boundary does not include the southern grass verge and hedgerows which define the properties to the south. This is because this verge is affected by access driveways to properties and has a more manicured character. Furthermore, the southern edge of the road is a clearer boundary feature. Conclusion No change.
Land South of Woodcote	ANON-VUXE-W53-Z, ANON-VUXE-WMAW-4, ANON-VUXE-WMG8-B, ANON-VUXE-W5GT-F and ANON-VUXE-WMZP-P support the inclusion of Land South of Woodcote. ANON-VUXE-W5US-V requested the inclusion of the remaining small parcel of land. Reasons include: Poor agricultural land Adjoins the Pilgrims Way Could be rewilded.	Commentary Natural England has reviewed this area. It notes that the Pilgrim's Way footpath is already included within the AONB and considers the field relates more strongly to the urban area and is transitional in terms of quality and character. When assessing the suitability of including additional land within the AONB, Natural England considers the current condition of the landscape, not its future potential. Natural England is not aware of plans to rewild this land. Conclusion No change.

Guildford		
<u>Area</u>	Representations	Natural England Commentary

Busbridge and Catteshall		
<u>Area</u>	Representations	Recommended Natural England Commentary
Scizdons and Squirrel Hill	ANON-VUXE-WE5J-3 supports the boundary change at Scizdons and Squirrel Hill.	Commentary Natural England notes the support for the proposed boundary.

Bookham	Bookham		
Area	Representations	Natural England Commentary	
Land at Bocketts Farm Park and Hawk's Hill	ANON-VUXE-WEMM-X, ANON-VUXE-WECB-9 and ANON-VUXE-WEMS-4 requested two areas: Firstly, the inclusion of the River Mole Nature Reserve, west of the River Mole and field east of the railway. Reasons include: • Local nature reserve.	Commentary This area was assessed as part of the Boundary Considerations Report (Page 66) which concluded that 'the area had a fragmented character which is diminished by transport infrastructure and commercial activity. Although the AONB boundary does not follow clear features on the ground (except in the east), this land is not considered suitable for inclusion within the AONB.' As a result, no change was proposed to the boundary.	

Bookham

<u>Area</u>	Representations	Natural England Commentary
	Important corridor leading into Leatherhead along river. Landscape on both sides deserves protection. Green Belt. Secondly, Bocketts Farm Park either side of the A246. Reasons include: Elderflower fields – important corridor free from development. AGLV. Green Belt. Attractive views.	Natural England has reviewed this in light of the evidence put forward by respondents. It acknowledges that this area includes two Sites of Nature Conservation Importance (SNCI) – Hawk's Hill, Cherry Orchard Farm and Bocketts Lane SNCI and River Mole Leatherhead SNCI. Natural England also acknowledges that the river forms an important corridor which stretches into the built-up area of Fairfield and Leatherhead. Nevertheless, the factors do not alter the fact that this landscape is fragmented and affected by transport infrastructure, commercial activity and urban fringe land uses and the river corridor has a more urban character as it extends northwards. Although the steep slopes offer some elevated views, the landscape itself is affected by its immediate context and by traffic noise. Natural England remains of the view that this area does not warrant designation as part of the AONB. Conclusion No change.
Land East of Dorking Road	ANON-VUXE-WECB-9, ANON-VUXE-WEZ7-N, ANON-VUXE-WS1C-6 and ANON-VUXE-W5U7-Z requested the inclusion of the Great Bookham Equestrian Centre. Reasons include: • Green Belt and Area of Great Landscape Value. • Similar characteristics to the wider AONB • Share the same indigenous flora characteristic of chalk down-land and the same fauna. • Integral with that of the contiguous AONB • Logical extension of Norbury Park.	Commentary This area was assessed during the Boundary Assessment as a minor boundary anomaly (page 65 of the Boundary Considerations Report). This site was described as follows: 'This area of land has an urban fringe character and is predominately used for equestrian purposes, with associated fencing and stabling and a show ground. This has affected the condition and character of this landscape. This land is not considered suitable for inclusion in the AONB. Furthermore, the current AONB boundary is well defined following a public bridleway.' No change to the existing boundary was recommended.

Bookham

Area Repr	<u>resentations</u>	Natural England Commentary
	landscape. Together they are part and parcel of one landscape. Sits within a sweep of qualifying land. Continuous area of open land. Striking, spacious landscape. Rolling landform within extensive views. Essential contribution to the views over the AONB Far-reaching views from it are best seen from the top of Crabtree Lane and the short track leading to the 'Admiral's Road'. Views of the Surrey Hills. While the AONB land to the South of the boundary differs in some ways from the excluded land to the North, both are essential to the visual integrity of the scene and in key respects they are identical. Delightful pastoral setting. 80 acres of well-kept pasture.	The Boundary Report is clear that minor boundary anomalies have been reviewed where 'the existing AONB does not follow a clear feature on the ground, where the land in question relates strongly to the wider AONB forming part of a sweep of qualifying land, and where a suitable alternative boundary can be defined' (page 45). In this instance, the issue revolves around the second of these. The existing AONB follows clear features on the ground, including the southern edge of the bridleway and the western edge of Dorking Road. However, Natural England notes that it excludes the bridleway which is an important landscape historic feature. Land east of Dorking Road falls within the Area of Great Landscape Value but outside of the built-up area as defined in the Mole Valley Local Plan. East of Dorking Road, the land is gently undulating and slopes down towards the urban edge and Dorking Road. Vegetation on the margins of the site restricts views to the wider landscape from some locations. Nevertheless, Natural England acknowledges that, from the urban edge, the land is perceived as forming part of a wider sweep of landscape, extending up to the urban edge. The land is currently used as an equestrian centre and, although it is laid to pasture, it is subdivided by multiple post and rail fences. The field division along with other equestrian ancillary development and features such as jumps, field shelters and two sand schools, create visual clutter and alter traditional landscape patterns. While the stabling buildings retain a rural vernacular, signage and car parking impart a more commercial character. Overall, the condition of this landscape is materially affected by the current land use.

Bookham

<u>Area</u>	<u>Representations</u>	Natural England Commentary
	 Features selected for mention in the evaluation are unrepresentative of the parcel of land as a whole – occur in northwest corner. None of the features mentioned above intrude visually on the scene. All are insignificant by comparison with the positive contribution of the extensive, open pastureland to the wider landscape. Surrounded on three sides by AONB Wash-over could be applied. Numerous working landscapes are 'washed over' to be included within the AONB. There are several such sites within a mile or so of the Equestrian Centre: a storage depot, a saw-mill, a mower works and several other equestrian properties. Clearly part of a single landform, working together to give a sense of openness and exposure to the sky, offering far-reaching views, blending in a smooth flow from the top of Crabtree Lane to the tree-line at Norbury Park. More aligned with the Government's commitment to landscape recovery, reducing habitat fragmentation and engaging people with nature. Urban edge is a clear boundary. 	This is most readily perceived when walking along the bridleway. From this recreational route there is a perceived distinction between the land to the south which retains the large-scale field pattern, typical of this landscape, affording open rural views to woodland, compared to the land to the south which is substantially subdivided by post and rail fencing and looks onto housing along the urban edge. Review of historic evidence has indicated that this land formed part of former common fields as late as the 1900s. By 1914, the farm buildings were in existence and the area subdivided into two fields with two small conifer plantations along the boundary division. By 1956, housing development to the north had been constructed. Aerial photographs show that the establishment of the Equestrian Centre was in existence in 1999 and that it has grown to its current extent since 2003. Planning history of the site shows that it was previously the subject of planning applications for residential development, in 1958, which was refused. Given that the Surrey Hills AONB was designated in the same year, it is likely that this was the reason the land was excluded from the boundary. The issues associated with this land, which are pertinent to a judgment to include or exclude the land, revolve around the following: Planning history and its exclusion from the AONB due to proposals for residential development. Planning history and its exclusion from the AONB due to proposals for residential development. The extent to which the site forms part of a sweep of land up to the urban edge. The extent to which the current land use impacts condition and quality. Natural England acknowledges that decisions of this nature are finely balanced. However, the nature of the equestrian land use is considered to have a detrimental effect on the character and qualities of the area, and to impart a more

Bookham		
<u>Area</u>	Representations	Natural England Commentary
		'urban fringe' character. This, coupled with the slope and vegetation and association with the built-up edge of Bookham, has led to Natural England's decision to continue to exclude the area. Although the site abuts the AONB landscape on two sides it is not surrounded by qualifying land and also occurs at the edge. Its inclusion is not necessary in order to bring in a wider area of qualifying land. Natural England therefore does not consider this is an appropriate use of wash-over. Conclusion No change.

Oxted	Oxted		
<u>Area</u>	Representations	Recommended Natural England Commentary	
Land North of Park Road	ANON-VUXE-WEZX-P, ANON-VUXE-WES4-B and ANON-VUXE-WE78-K (Tandridge District Council) support the proposal for a minor boundary refinement for "Land North of Park Road" in Oxted.	Commentary Natural England notes the support for the proposed boundary.	

Oxted

<u>Area</u>	Representations	Recommended Natural England Commentary
Area Land at Chichele Road	ANON-VUXE-WSQF-9 (Tandridge District Council) agrees with the proposed boundary refinement for this area. ANON-VUXE-WEZX-P disagrees that land at Chichele Road should be included in the AONB. Reasons given include: • The site is not subject to any landscape quality designations (outside of AGLV and AONB) and has consistently been judged to be outside of these areas. • Site is seen in the context of the settlement of Oxted. • Site does not have sufficient natural beauty to be designated as AONB. • Views of the existing AONB from the site are restricted by woodland.	Recommended Natural England Commentary Commentary Natural England notes the support for the proposed boundary. The land off Chichele Road did not form part of EA10 and was assessed as a minor boundary refinement following evidence submitted as part of the 'Call for Evidence' which included information on the positive qualities of the land. It is referred to in The Boundary Considerations Report as part of land north of Park Road. The Boundary Considerations Report states 'To the west, there is a further irregular field which is contained by mature hedges and woodland shaws. Although close to the urban area, this latter area retains a strongly rural character. An alternative boundary can be defined along the vegetated edge at the rear of properties on Park Road and hedgerows/woodland to the southwest.' Natural England agrees that this land lies beyond the Area of Great Landscape Value (AGLV) boundary. The ability to see a site in the context of a settlement is not a reason for the site to be excluded from the AONB. There are many examples where the AONB extends up to and abuts the urban edge, e.g. immediately to the north.
	 The existing AONB boundary follows a clear line on the ground and is not a boundary anomaly. Suggestion that evidence provided from the 'call for evidence' was submitted to protect the site from specific development proposals. CALA is pursuing a planning application for residential development on this site. 	The Boundary Report is clear that minor boundary anomalies have been reviewed where 'the existing AONB does not follow a clear feature on the ground, where the land in question relates strongly to the wider AONB forming part of a sweep of qualifying land, and where a suitable alternative boundary can be defined' (page 45). In this instance, the issue revolves around the second of these.
		Natural England notes that respondent ANON-VUXE-WEZX-P has concerns that the evidence provided during the 'Call for Evidence' was motivated by a desire to

Oxted

Area	<u>Representations</u>	Recommended Natural England Commentary
	Site is one of very few suitable opportunities to deliver new homes in Tandridge District which has less than 2 years' housing land supply.	protect the site from development. Natural England does not consider the motives of respondents but considers evidence on its merits in relation to the Natural Beauty Criterion.
		Natural England has undertaken an assessment of the natural beauty of the site. This approach reflects the Natural England Guidance which stresses that the Natural Beauty Criterion should not be applied on a field-by-field basis (para 5.3). The analysis provided by respondent ANON-VUXE-WEZX-P does not consider the land in context of the wider landscape of which it is a part.
		Natural England agrees that the land currently comprises a pastoral field and has been ploughed in the past. Natural England notes that the topography of the land is gently undulating and has visual connections to the wider AONB landscape forming part of a wider sweep of qualifying land. Historic Landscape Characterisation classifies the land (and the two fields to the north) as large irregular assarts with wavey or mixed boundaries. The ancient woodland, which flanks the northern and western boundaries, is split by the existing AONB and makes an important contribution to the character and qualities of the area. Natural England acknowledges that the metal fencing delineating the playing fields of Oxted School (to the south) has a more urbanising influence, however, it also notes that the presence of the playing fields means built development is set back and at a lower elevation, such that it recedes and does not significantly undermine the condition or integrity of the area.
		Natural England Guidance makes it clear that decisions on a boundary need to be made consistently along its length (para 9.3). Given that the AONB boundary extends up to the urban edge to the north and includes similar assarted fields, and that land north of Park Road is also proposed for inclusion, Natural England is of the view that the inclusion of this land, given its similar qualities and

Oxted		
Area	Representations	Recommended Natural England Commentary
		characteristics, is justified. Natural England considers this is a consistent approach to the boundary in this context.
		The land is not currently allocated within the local development plan, nor is there any planning permission associated with the land. Natural England is aware that the land is being promoted for development and that pre-application discussions have taken place.
		Should the planning circumstance of the site change prior to the Designation Order being submitted to the Secretary of State, the decision to include this land within the AONB will be reviewed.
		Conclusion No change.

Dorking		
<u>Area</u>	<u>Representations</u>	Recommended Natural England Commentary
Clay Copse and Milton Heath	ANON-VUXE-WM49-S 'I write to support the change to the boundaries in northwest Dorking (consultation Fig 25). In particular the inclusion of Milton Heath seems a most natural extension.'	Commentary Natural England notes the support for the proposed boundary.

Dorking

<u>Area</u>	Representations	Recommended Natural England Commentary
Land South of A25 at Sondes Place Farm	 ANON-VUXE-W5YQ-X and ANON-VUXE-WMF5-7 requested inclusion of this area stating: 'I can find no reference to this area in any of the documents you have published for scrutiny.' Reasons for including this land: Integral part of the views from a viewpoint to the north of the site (Steers Field). Agricultural land. Highly visible in wider views. Development along A25 does not impinge on wider views. Clear boundary on the ground Impact of potential future housing on area. 	Commentary This land did not form part of the initial Study Area put forward by Natural England and was therefore not included within an Evaluation Area. Evidence was submitted during the 'Call for Evidence' regarding this land as well as land north of the A25. Land to the north of the A25 was referred to as Land Northwest of Dorking and formed an area contiguous with the existing AONB boundary. Land at Sondes Place Farm was found to comprise two arable fields sandwiched between the urban edge, school playing fields and the A25 and development to the north. As a result, this latter area was considered to be isolated and not considered further. For this reason, there is no specific reference to this land in the Technical Reports. Land at Sondes Place Farm was subject to a planning application in the summer of 2023, followed by a planning appeal. The appeal was allowed in Nov 2023. This land therefore has planning permission for housing and, in accordance with Natural England Guidance, should be excluded from the Surrey Hills AONB revised boundary. Conclusion No change.
Land Northwest of Dorking	ANON-VUXE-WEZ7-N (Mole Valley District Council), ANON-VUXE-WSQK-E and ANON-VUXE-WM9G-C requested inclusion of this area. Reasons include:	Commentary This area was considered as part of the Minor Boundary Refinements and is referred to as Land Northwest of Dorking (page 70) in the Boundary Considerations Report.
	Highly scenic undulating landscape.Assessment is not adequately detailed.	Consultation Analysis Depart 2004

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Dorking

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<u>Area</u>	Representations	Recommended Natural England Commentary
	 Urban edge does have a negative impact but localised e.g. development along Curtis Road. Land is contiguous with the wider landscape despite the railway. Woodland contributes to the quality of the area. Striking views into the AONB and Dorking. Church landmark contributes to views. Previously included suitable for designation by Hankinson Ducketts Associates (HDA). Desirability: Frames the wider countryside and settlement Setting to Dorking. No sure safeguard for land outside of the AONB. Contributes to view into and out of the AONB. Boundary: Two boundary options are put forward: Firstly, a boundary which runs to the north of Milton Court along Pip Brook and then along field boundaries to the south side of Milton Court Lane and then north along a farm track to the railway. Secondly, a boundary which is as above but extends further east to the built edge.	Natural England has reviewed this area in light of evidence received by respondents. The Boundary Considerations Report set out on page 70 that this area was affected by ancillary development associated with the commercial use of former mansion houses and grounds and the proximity to Curtis Road Industrial Estate. Natural England also reviewed this area in light of other minor alterations to the boundary west of Reigate, in order to ensure consistency of approach. When making decisions about the location of boundaries between existing urban areas and the existing AONB boundary, decisions can often be finely balanced. In locations close to the chalk scarp, the scale and drama of the rising topography can lift scenic qualities and conversely urban fringe influences can fragment and undermine condition. Given that a decision was reached to include land west of Reigate at the footslopes of the chalk scarp, even where there is some isolated development, Natural England has decided to review this landscape east of Dorking to ensure consistency in our approach. Here the landscape, like land west of Reigate, forms a sweep of land from the chalk scarp. In addition, it dips into a shallow basin associated with Pipp Brook before rising again towards Milton Court Lane and Milton Court. Here the former mansion house of Milton Court affords views across the landscape to the dramatic scarp slopes. Although land up to the urban edge, comprises large regular fields with straight boundaries, around Milton Court, the fields comprise regular assarts with wide hedgerows and former parkland landscape. Much of this area has a moderate degree of tranquillity and rurality, despite its proximity to Dorking and traffic associated with employment sites. Within this context, the railway is not a strong visual feature and does not detract from scenic qualities.

Dorking

<u>Area</u>	Representations	Recommended Natural England Commentary
		Although the buildings associated with Milton Court are used for commercial purposes, they are nonetheless Grade II* and their scale and position in the landscape - located on rising land and surrounding by parkland, with the chalk scarp backdrop, means that they have a strong sense of place and contribute to the scenic quality of the area. On balance, the commercialisation and signage is subservient to the drama of the scarp backdrop. Similarly, views across the land to the east towards the church spire of Dorking enhance scenic qualities and compositions, while the narrow-walled lane of Milton Court Lane has a secretive quality at its western end, opening out to offer wider views northwards. However, further east the landscape is increasingly influenced by the proximity of the urban edge where it becomes more visually dominant — especially large-scale industrial units. Natural England has reviewed the extent to which the tree and shrubbery belt, associated with the Curtis Road Industrial Estate, will mitigate these effects in future.
		Having reviewed all the evidence, Natural England has concluded on balance that part of this area warrants inclusion within the Surrey Hills Area of Outstanding Natural Beauty. In defining an appropriate boundary consideration has been given to declining condition and quality towards the urban edge and the exclusion of development allocation Policy SDS26.
		Natural England has therefore identified clear features for the boundary to follow which include mature hedgerows and Milton Court Lane. This enables the boundary to be pulled back from the urban edge and drawn within the transitional landscape, preventing an overly complex boundary and/or inclusion of lesser quality land, whilst still including a more extensive area at the foot of the scarp.
		Conclusion Minor addition to include land northwest of Dorking.

Dorking		
Area	Representations	Recommended Natural England Commentary
		(Addition 25 – refer to Fig 25a)

Haslemere	Haslemere			
<u>Area</u>	Representations	Recommended Natural England Commentary		
General Support for Changes around Haslemere	ANON-VUXE-WMYB-7 'I support all the proposed extensions within Haslemere which make perfect sense'. ANON-VUXE-WEBK-H 'We support inclusion of this area in the AONB boundary — Land East of Sturt Road, Land North East of Woolmer Hill, Land West of Farnham Lane, Land South of Grayswood Common, Woodland along railway, Land at Tyndalls Wood'.	Commentary Natural England notes the support for the proposed boundary.		
General objection to changes around	ANON-VUXE-WE5X-H 'There is no need for yet more areas to be designated in the proposed way. There is plenty of AONB and the further designation simply strangles the ability to change	Commentary Natural England has considered minor boundary anomalies on the fringes of Haslemere where the current AONB does not follow clear features on the ground		

Aroa	Representations	Recommended Natural England Commentary
<u>Area</u>	Representations	Recommended Natural England Commentary
Haslemere	as needs must. There is no need for yet more heavy and bureaucratic administration of largely private land by an unelected organisation'. 'To counter the decisions of Natural England requires appeal to the Secretary of State which is quite beyond most citizens'. Concern expressed especially for proposed inclusion	and or where the land between the AONB boundary and the urban edge is part of a wider sweep of qualifying land. Natural England disagrees that designation of land as AONB creates more heavy and bureaucratic administration and this is addressed in Appendix 2. The three areas of particular concern are discussed in more detail below.
	 Land South of Scotland Lane Land at Sturt Farm Land between Bunch Lane and Weydown Road. 	
Land South of Scotland Lane	ANON-VUXE-WSK5-J and ANON-VUXE-WEBK-H requested the inclusion of land south of Scotland Lane which is not the subject of a planning permission. Reasons include: • Land not subject to a planning permission • Prominent position within the surrounding landscape • Wildlife corridors along Scotland Lane and Tennyson Lane.	Commentary This area was considered as part of the Minor Boundary Refinements and is referred to as Land South of Scotland Lane (page 71) in the Boundary Report. This noted that the site was subject to an extant planning permission and no change to the AONB boundary was proposed. Natural England has reviewed this area in light of evidence received by respondents. Natural England acknowledges that the land between Scotland Lane and Red Court is the subject of an approved planning application but land to the east of

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<u>Area</u>	Representations	Recommended Natural England Commentary
	ANON-VUXE-WE5X-H considers that land south of Scotland Lane is not required to support the existing AONB and would be detrimental to its use for very badly needed housing.	Red Court is not. Natural England also notes that the current AONB boundary does not follow clear features on the ground and that it splits an area of ancient woodland. Natural England has considered if an alternative boundary exists which enables this area of prominent rising land on the margins of the AONB to be included. Natural England has concluded that a clearer boundary could be defined which follows the northern edge of the ancient woodland, property boundaries and northern edge of woodland adjacent to Scotland Road, as well as the access driveway to Red Court. This would enable the open slopes and continuation of the bridleway, up to the start of built development, to be included. This boundary addresses the fact that the current AONB as defined in the Designation Order Map and Waverley Local Plan does not follow features on the ground through this area. Conclusion Minor addition to ensure AONB follows clear features on the ground and includes prominent open land, ancient woodland and bridleway. (Addition 26: Refer to Fig 28a)
Land at Sturt Farm	ANON-VUXE-WEBK-H requested that this area be reconsidered for inclusion within the AONB. Reasons include: • Approved planning application WA/2016/2144 and subject to current planning application WA/2022/00281 relate to other sites close by and not the area identified. • Treelined ridge.	Commentary This area was considered as part of the Minor Boundary Refinements and is referred to as Land at Sturt Farm (page 71) in the Boundary Considerations Report. Natural England has reviewed this area in light of evidence received by respondents.

<u>Area</u>	Representations	Recommended Natural England Commentary
	Areas of woodland, grassland and mature hedges. Ecological network. ANON-VUXE-W5NR-M and ANON-VUXE-WMEA-J raised concerns regarding the existing AONB boundary shown on the Statutory Consultation Boundary Map Fig 28 and the AONB boundary as plotted on the Waverley Borough Adopted Local Plan Policies Map 2018. Furthermore, it includes land allocated for development. An amendment to the Natural England proposed boundary is requested accordingly.	Natural England notes that this area is the subject of planning applications and permission (some of which are being built out). In particular, Natural England understands that the current planning position is as follows: • Planning application WA/2016/2144 was withdrawn in 2017. • Planning application WA/2022/00281 was refused planning permission. • Planning application WA/2023/00589 was approved in July 2023 for five dwellings on the southwestern edge of consented application WA/2018/0275 (which is being built out). In accordance with Natural England Guidance (Appendix 4) land with planning permission should normally be excluded. Natural England has reviewed the existing AONB boundary as depicted in the Waverley Borough Local Plan and Natural England boundary map Figure 28, alongside the Designation Order Map, which is the legal boundary to the existing AONB. Natural England agrees that there is a discrepancy in how the existing AONB boundary is mapped. The legal boundary of the existing AONB is that depicted in the Designation Order Map. Discrepancies may arise as a result of the interpretation of the 1958 Designation Order Map and the mapping of the existing boundary at differing scales. Natural England will be undertaking a detailed review of the existing AONB digitised boundary at both 1:25,000 scale and 1:2500 scale, prior to the finalisation of maps for the Designation Order, to ensure that any proposed Extension Area boundary departs from, and joins to, the current AONB in the correct location. Further information relating to mapping is set out in Appendix 1. In relation to the housing site, which is currently being built, Natural England acknowledges that, having consulted the Designation Order Map, this housing site lies within the current AONB boundary. The current AONB boundary review

Area	Representations	Recommended Natural England Commentary
Land between Bunch Lane and Weydown Road	ANON-VUXE-WEBK-H requested the boundary in this area be reconsidered. Reasons include: • Difficult to follow property boundaries in this instance as the whole area has various private	specific issue of de-designating land is given in Appendix 1. On this basis Natural England does not agree that the boundary should be amended in this location. Conclusion No change. Commentary This area was considered as part of the Minor Boundary Refinements and is referred to as Land between Bunch Lane and Weydown Road (page 72) in the Boundary Report.
	 We propose using the WSK5-J (Haslemere South Residents Association) boundary. Area of Strategic Visual Importance (ASVI) boundary (subsequently used to determine settlement boundaries for the Neighbourhood Plan) so all boundaries are congruent and include the Ancient Woodland designators. 	Natural England has reviewed this area in light of evidence received by respondents. Natural England has given consideration to the use of the Area of Strategic Visual Importance as defined in the Local Plan and reviewed the Areas of Strategic Visual Importance Topic Paper (Nov 2020). This document sets out the purpose of this designation as: 'to protect areas of land which are important because of the role they play in establishing the character of a locality and preventing coalescence of developed areas.' The Land between Bunch Lane and Weydown Road was considered to be an Area of Strategic Visual Importance (ASVI) following review, and various amendments were made to the boundary as set out in the Nov 2020 report (pages 23 and 24). These changes were incorporated into the Waverley Borough Local Plan Part 2 (March 2023) map 28. The ASVI boundary has been checked against the settlement boundary and found to be congruent. Natural England has also checked the proposed AONB boundary and identified a number of minor

<u>Area</u>	Representations	Recommended Natural England Commentary
		errors between it and the settlement boundary. In correcting these errors, which occur to the south and west, Natural England confirms that the proposed AONB boundary should follow that of the settlement boundary and ASVI.
		Conclusion Minor deletion at Weydown Road Car Park. Minor additions along Bunch Road to ensure boundary follows settlement boundary and Area of Strategic Visual Impact, which are the same. (Deletion 13 – Refer to Fig 28a)
		(Addition 27 – Refer to Fig 28a)
Land at Lower Hanger Wood	ANON-VUXE-WEBK-H requested the boundary in this area be reconsidered. Reasons include: Owned and managed by Waverley Borough Council (WBC). Public recreational space. Area of Greater Landscape Value (AGLV). Ancient woodland. Access to woodlands from urban area. Wooded backdrop to the AONB. Boundary does follow feature on the ground but including the WBC woodland would utilise curtilage and property boundaries.	This area was considered as part of the Minor Boundary Refinements and is referred to as Land at Woolmer Hill (page 74) in the Boundary Report. Natural England has reviewed this area in light of evidence received by respondents. Natural England agrees that this area contains ancient woodland which is located on steep slopes and that these areas run into the urban area. Minor boundary variations are made where the existing AONB boundary does not follow a clear feature on the ground or where there is no clear rationale for the boundary. In this instance, and as set out in the Boundary Report, Natural England is of the view that there is no real justification for extending the boundary in this location. Furthermore, the area is already managed by Waverley Borough Council and comprises land uses which relate more closely to the urban area.
		Conclusion No change.

Haslemere		
<u>Area</u>	Representations	Recommended Natural England Commentary

Beacon Hill and Hindhead (formerly referred to as Grayshott)			
<u>Area</u>	Representations	Recommended Natural England Commentary	
General comment	ANON-VUXE-WEBK-H The areas considered lie adjacent to Beacon Hill and Hindhead, not Grayshott which is in Hampshire	Commentary Natural England notes that the areas considered are adjacent to Beacon Hill and Hindhead and will make the relevant changes to the naming of these areas in the final technical documents which are submitted as part of the Designation Order to the Secretary of State. Conclusion No change.	
Land north of Linkside North and Eight	ANON-VUXE-WEBK-H	Commentary	

Beacon Hill and Hindhead (formerly referred to as Grayshott)

<u>Area</u>	Representations	Recommended Natural England Commentary
Acres	'There is an anomaly where the AONB boundary is difficult to follow on the ground. Redefine boundary along property boundaries'.	This area lies to the southwest of the proposed boundary change at and north of Linkside North of Eight Acres (page 76 in the Boundary Considerations Report) and has not previously been considered in the boundary review.
		Natural England has reviewed this area in light of evidence received by respondents. Natural England acknowledges that the boundary in this location does not follow a clear feature on the ground. The land proposed for inclusion in the AONB forms part of the Hindhead Golf Course and is a small parcel of land surrounded by development on three sides. Here, the AONB follows the settlement boundary and cuts across in a straight line between two areas of development. Just to the south of this area, development associated with Hindhead Golf Club is also excluded.
		Given the small scale of the parcel of land, the influence of the adjacent urban area and the exclusion of development associated with the golf course to the south, Natural England considers that there is no strong justification for altering the current AONB boundary.
		Conclusion No change.

Other New Areas				
<u>Area</u>	Representations	Recommended Natural England Commentary		
Redhill Common	ANON-VUXE-WEQW-C requested this area for inclusion in the AONB. No reasons were given.	Commentary Redhill Common was not previously considered as part of the boundary review as it forms an area of isolated land surrounded by the built-up area of Redhill and Reigate. Natural England does not consider this area meets the Natural Beauty Criterion and is separated from the wider AONB by urban development. Conclusion No change.		