

Appendix 2: Detailed Analysis of Desirability Responses

Table A: Desirability Responses in Support of Designation

Desirability Theme in Support of Designation	Representations	Natural England Commentary
Benefits from integrated management	ANON-VUXE-WS1Q-M <i>'We believe that the areas included in the variation order strongly merit designation as part of the Surrey Hills National Landscape. It is the best way to ensure this much loved and valued area is protected and conserved, in its entirety, for future generations of residents and visitors. The designation will help promote sympathetic management of these areas and help to safeguard them as part of a living, working landscape for the benefit of the people who live there, and for visitors to come to enjoy its natural beauty/special qualities.'</i> ANON-VUXE-WSQE-8 <i>'Very important. It [Cranleigh Waters Extension] links the surrounding AONB areas together creating a wildlife corridor and a natural extension of the existing area. These are all part of the same landscape and criss-crossed by bridleways, the Downs Link footpaths - that are all inter-linked. It should have all been included originally in the AONB. By extending the AONB to 'wash over' all this area you are also protecting for the future the all important surrounding AONB areas like St Martha's Hill and Blackheath Common, Winterfold etc.</i> ANON-VUXE-WEVM-7 <i>'Dockenfield Hills bridges the gap between Alice Holt SDNP and Surrey Hills AONB and would bring continuity of protection across an area of stunning beauty, at the same time consolidating a much wider area of protection.'</i>	<u>Commentary</u> Natural England agrees that designation of land which meets the Natural Beauty Criterion enables integrated management through the implementation of the AONB Management Plan. Where qualifying land connects areas of existing national landscape designation, such as the South Downs or valued landscape such as the Wandle Valley, this brings added benefits in terms of joint working and coordinated initiatives across the designations/recognised areas. Stewardship schemes are particularly important in helping to deliver integrated land management and National Landscapes attract additional funding in addition to the Environmental Land Management Scheme through the Farming in Protected Landscapes Scheme. These additional resources are always likely to be targeted to places where they will have the greatest impact and historically that has meant National Landscapes, rather than wider countryside. Natural England remains of the opinion that extending the AONB boundary to encompass the proposed extensions will provide a positive impetus with regard to future land management initiatives. Furthermore, the duties placed upon public bodies which would immediately apply, if legal Orders extending the Surrey Hills AONB come into effect, would further help to ensure that the existing high levels of environmental management undertaken within the proposed extensions are recognised and reflected in future decision making by statutory undertakers.

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	ANON-VUXE-WE5K-4 <i>'I think its' important to consider the unique location of Dockenfield Hills. Dockenfield Hills is sandwiched between the South Downs National Park to the West and the existing Surrey Hills AONB to the East. The quality of the landscape of the Dockenfield Hills proposed area is equal in beauty to its, already protected, bordering neighbours and linking the existing two areas together will maintain the wider landscape continuity into the future.'</i> ANON-VUXE-WEMU-6 <i>'Designation of Dockenfield as AONB would help protect and maintain the natural beauty of the current AONB and South Downs National Park by protecting this wildlife corridor between these two protected areas, thus preventing fragmentation of habitats by the increasing urbanisation that is threatening to spread into Dockenfield from Farnham and its suburbs.'</i> ANON-VUXE-WEK6-5 <i>'Linking up [the] AONB and SDNP would create a homogenous area of outstanding natural beauty fulfilling the objectives of an [a] NP [National Park] and AONB. Extending the Surrey Hills AONB to include this area would help preserve the natural environment and rural heritage, boost nature's recovery, promote tranquillity, give more opportunity to support people's health and wellbeing through access to nature, and to enjoy this beautiful area; and fundamentally safeguard a beautiful landscape for future generations. This beautiful countryside is immensely important for peoples' happiness and well- being, being regularly used for horse riding, walking and cycling. It is an anomaly that the small gap between the existing AONB and the South Downs National</i>	

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	<i>Park exists and if this still wild countryside is to survive it urgently needs the protection of the AONB.'</i> ANON-VUXE-W513-R <i>'The valley of the Bourne stream is an important green corridor connecting the Alice Holt Forest to the Wey valley and the existing Surrey Hills AONB, as recognised by the Surrey Wildlife Trust in its review towards creating a local Nature Recovery Strategy. Green corridors are especially important to aid conservation of wildlife in times of fire/flood and indeed climate change. Designation as an AONB would aid in the conservation of the rich biodiversity of the area and enhance connectivity.'</i> ANON-VUXE-WESM-4 <i>'I agree with the consultation document that integrated management and protection would help to halt detracting features such as roadside erosion, larger scale modern agricultural development, noise, lighting and invasive species.'</i> ANON-VUXE-WEPN-2 <i>'contributes to the story of the Wandle Valley and its upper catchment of chalk landscapes and dry valleys - the functional hydrological relationship with the Wandle Valley. Designation will safeguard and support future management of this distinct landscape.'</i>	
Benefits arising from additional resources (funding,	ANON-VUXE-WS1Q-M <i>'This addresses a long-standing anomaly and means that areas that fully meet the statutory criteria are now going to be included. This also ensures these areas will benefit from the focus that the Conservation Board can bring in terms of management, resources and expertise.'</i>	<u>Commentary</u> Natural England agrees that designation of land which meets the Natural Beauty Criterion enables access to the additional resources which come from designation. The AONB receives dedicated core funding from the Government's Department for Environment, Food and Rural Affairs (Defra) as

Desirability Theme in Support of Designation	Representations	Natural England Commentary
expertise and volunteers)	ANON-VUXE-WEGW-2 <i>[Anon] is pleased to see that AONB designation is expected to bring additional funding, stewardship and permitted development rights restrictions to tackle the issues highlighted.'</i>	well as contributions from relevant local authorities to further its conservation work, as well as access to additional grants and staff resources, and volunteers. These resources make a material difference to the conservation and enhancement of the landscape's natural beauty and special qualities.
Benefits of conservation and enhancement	ANON-VUXE-WS1Q-M <i>'The South Downs National Park and Surrey Hills are already contiguous at the western end on the Surrey, Hampshire and West Sussex borders and the proposals would further increase this connectivity with benefits for nature recovery and communities connection to nature. Further to existing collaboration the South Downs National Park Authority would look to continue to work in partnership.'</i> ANON-VUXE-WEJQ-Y <i>[Anon] strongly supports the extension of the Surrey Hills AONB as proposed. The Trust believes that extending the AONB will enhance the protection of this special landscape and its biodiversity.'</i> ANON-VUXE-WEVJ-4 and ANON-VUXE-WS1U-R: <i>'The designation would assist this objective of conserving and enhancing the Hog's Back.'</i> ANON-VUXE-WEEK-M <i>'Hogs Back provides invaluable ecosystem services that contribute to climate resilience. Its woodlands sequester carbon dioxide, mitigating the impact of climate change. The area's wetlands act as natural flood defences, protecting nearby communities. By designating Hogs Back as an Area of Natural Beauty, we prioritise its conservation, enhancing its</i>	<u>Commentary</u> Natural England agrees that designation of land which meets the Natural Beauty Criterion ensures that the purpose of designation to conserve and enhance the natural beauty of the landscape applies. This may include a range of initiatives that look to make habitats and natural ecosystems bigger, better and more joined up. The AONB partnership provides support to landowners and farmers to conserve and enhance natural habitat through schemes such as Farming in Protected Landscapes. The Surrey Hills AONB Partnership, in collaboration with the AONBs landowners and managers, have developed a Nature Recovery Strategy which will run from 2021-2031. This strategy aims to make more space for nature and includes details on how the AONB will deliver on its nature recovery targets, how it will work collaboratively and how the strategy will be funded. It also makes a commitment to work across its borders to ensure that the knowledge and the impact of the AONBs activities reach beyond its boundary. AONBs feature prominently in the Government environment plan "A Green Future: Our 25 Year Plan to Improve the Environment" published in January 2018. Chapter 2: 'Recovering nature and enhancing the beauty of landscapes', makes a firm commitment to conserve and enhance the natural beauty of our landscapes by reviewing National Parks and Areas of Outstanding Natural Beauty (AONBs) for the 21st century, including assessing whether more may be needed. The Landscape Review, led by

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	<i>capacity to provide essential ecosystem services that benefit the environment and society as a whole. Specifically, the Hogs Back hill act as a natural sponge to capture heavy rains and avoid water flooding Tongham and Ash.'</i> ANON-VUXE-WEPM-1 <i>'Designating Hogs Back as an Area of Natural Beauty in the UK would be a resounding commitment to the preservation of its unparalleled scenic beauty, rich biodiversity, cultural significance, and environmental resilience. Such a designation will safeguard this natural treasure, ensuring that future generations can experience the wonders it holds. By recognising the unique qualities of Hogs Back, we affirm our responsibility to protect our natural heritage and cherish the remarkable tapestry of life that makes the United Kingdom so extraordinary.'</i> ANON-VUXE-W513-R <i>'The valley of the Bourne stream is an important green corridor connecting the Alice Holt Forest to the Wey valley and the existing Surrey Hills AONB, as recognised by the Surrey Wildlife Trust in its review towards creating a local Nature Recovery Strategy. Green corridors are especially important to aid conservation of wildlife in times of fire/flood and indeed climate change. Designation as an AONB would aid in the conservation of the rich biodiversity of the area, and enhance connectivity.'</i> ANON-VUXE-WEBE-B <i>'Preservation of the existing habitat and the need to stem the loss of biodiversity which continues despite the best endeavours of many excellent local volunteers.....'</i>	Julian Glover and published in 2019, and the subsequent Government's response in 2022 cited its commitment to protecting 30% of land for nature by 2030 as noted in the Natural Beauty Assessment Report (paragraph 1.4.2). The Protected Landscape Targets and Outcomes Framework, published early this year (2024), alongside the revision of strengthened AONB management plans, means that AONBs will be further committed to recovering nature and enhancing the natural environment.

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	ANON-VUXE-W5E2-B <i>'This area of Surrey is slowly being developed to such an extent that the amount of wildlife that I knew as a child is diminishing at an alarming rate and anything that we can do to prevent any more decline in wildlife is of long -term benefit to future generations.'</i> ANON-VUXE-WMZY-Y <i>'This is a natural extension, which will aid the local nature recovery network.'</i> ANON-VUXE-WEAX-W <i>'We need more wetlands and meadows to help nature and biodiversity. Bringing more attention to this area [Wey Valley, Farley Hill] should help with this objective.'</i> ANON-VUXE-W5RD-A <i>'There are a lot of wildlife [wildlife]in this area; which represents the British natural beauty. Those can better be protected if Chipsted valley is designated as AONB.'</i> ANON-VUXE-W5WT-Y <i>'Connecting as many of these areas as possible can only be good for aiding wildlife corridors to ensure that the various species that live here can survive and thrive..'</i> ANON-VUXE-WMZF-C <i>'Chalk Downland is such a globally rare environment that these areas really need all the protection they can get.'</i> ANON-VUXE-WEJ3-1 <i>'Extending and designating this area as AONB will protect endangered species (snails, butterflies, bats, bees and</i>	

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	<i>delightful deer with their fawns) and will preserve the area for future generations.'</i> ANON-VUXE-WE2C-S <i>'Significant sewage spills in the [Cranleigh] waters require better oversight. Aonb [AONB] status will help this.'</i> ANON-VUXE-W5AC-R <i>'It is [a] wildlife corridor between greensand hills and connects the greensand hills and valley scenically. Makes a whole.'</i>	
Benefits from Improved Access and Visitor Management	ANON-VUXE-WMN1-B <i>'the existing level of use by the public and the accessibility of these areas [proposed for designation] meaning that visitor numbers could increase, the protection added by aonb [AONB] designation would be valuable.'</i> ANON-VUXE-W5AT-9 <i>'I am concerned that "high public usage" of the area is seen as an issue. Also referred to is the "conflict between livestock grazing and dogs". As I walk there freely and regularly with dogs (who do not go anywhere near any livestock) I am concerned about the measures that may be adopted by the AONB teams to "resolve" these issues. I do not agree with any measures which would prevent access to the public or their dogs.'</i> ANON-VUXE-W5HJ-6 <i>'Few footpaths running through the wood which would benefit from small sums to improve signposting and general management. If the boundary is extended (which I support), then given the heavy use of the area for recreation and amenity it would be worth looking separately at access.'</i>	<u>Commentary</u> Direct public benefit from the designation of the proposed Extension Areas would derive from the potential for improved opportunities to enjoy the scenic beauty of the area from existing rights of way and from the opportunity this could afford for an increased understanding of its special qualities. The extension of the AONB could enable further enhancement of these existing access opportunities if deemed appropriate and with the agreement of the landowners. Although AONBs do not have the second statutory purpose ascribed to National Parks (ie promoting understanding and enjoyment of its special qualities by the public), it is apparent that activities designed to help people understand and enjoy the special qualities of the Surrey Hills AONB are a very high priority locally, as reflected within the AONB Management Plan (Section 2.8). The inclusion of additional land within the AONB would not in itself bring about any change in existing access arrangements. On the contrary, the AONB Partnership can provide support to landowners to mitigate any conflicts between access and land management.

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	<i>(Limited) spaces for car parking, signposting from the station etc. At the moment cars park at the side of the road, but this could benefit from consideration and management.'</i> ANON-VUXE-WEJ3-1 <i>'It provides an area for people to continue coming here to enjoy sporting activities, including walks, cycling and horse-riding, as well as leisure activities whilst appreciating the beauty of the surroundings, taking in the stunning views and benefitting from some fresh air.'</i> ANON-VUXE-W5AC-R <i>'It would help by giving more legal protection to a well-used area that could easily be over-used and therefore sustain long term damage.'</i>	The Surrey Hills AONB engages in enhancing recreation, health and wellbeing, through Surrey Hills Enterprises and tourism partnerships, such as Visit Surrey and the National Trail's Great Walks project. Its work in relation to access and enjoyment is also evidenced in the receipt of additional grants and resources to improve connections between centres of population and the AONB. Natural England therefore agrees that the inclusion of land that meets the Natural Beauty Criterion will enable the AONB to bring its resources and experience to bear on improving access and understanding of the proposed Extension Areas. This would not prevent the AONB from continuing to work beyond its own boundary as it currently does. Within an AONB the management of Public Rights of Way remain the responsibility of the County Council and designation would not result in any change to this responsibility.
Statutory protection in planning	ANON-VUXE-WSRJ-E <i>'we must endeavour to keep this beautiful area from being over developed and built on and consequently lost for ever under concrete'</i> ANON-VUXE-WSQV-S <i>'Amazingly unspoilt and should be kept intact from any housing schemes.'</i> ANON-VUXE-WMX7-U <i>'This area would hugely benefit from the added security of it being designated as AONB and needs to be further protected.'</i> ANON-VUXE-WMAP-W <i>'This area is naturally beautiful and must be given protection from developers and others who wish to destroy it. Extending the AONB boundary to include Banstead Woods and</i>	<u>Commentary</u> Many supporters and some objectors to the proposed extensions to the Surrey Hills AONB make reference in their consultation responses to the planning system, either as a positive tool for the conservation and enhancement of natural beauty or an unwanted burden on business and farming (see below). It should be noted, however, that planning legislation, general processes and systems for plan making and development management decision-making– are generally the same within AONBs as they are outside these designated landscapes. Though local planning policies may vary, the National Planning Policy Framework (published in December 2023) does provide greater protection for designated landscapes where development should be limited, and major development is not generally compatible with the statutory purposes of these areas. In making balance weight should be given to protecting the natural beauty of these areas.

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	<i>Chipstead Valley would be a strong step in the right direction to prevent the country being covered in concrete.'</i> ANON-VUXE-WM3E-4 <i>'This whole area would greatly benefit from being designated as AONB as increasingly this whole part of Surrey has been coming under severe pressure for an increase in housing. Particularly in the adjacent LB [London Borough] of Croydon due to their Planning Committees, which thank goodness have been recently relieved of powers. We need protection from Developers due to our closeness to London and being in an AONB would afford this protection. The local roads are narrow and beautiful all year round and the pressures from Developers has increased so much that we are in danger of the beauty being swept aside by housing.'</i> ANON-VUXE-WMSZ-S <i>'It is an area of chalk downland with a variety of precious wildlife that needs protection from the ravages of urban development and increased traffic.'</i> ANON-VUXE-WMVS-6 <i>'It is important to include this area so that no encroachment ie. housing can be permitted for years to come.'</i> ANON-VUXE-WM3B-1 <i>'Additional protection for this area would be highly appreciated.'</i> ANON-VUXE-WEGW-2: <i>'In particular, [Anon] notes the D[Desirability Assessment] Report's concerns relating to the erosion of rural lanes, addition of close board fencing/gated accesses, and coniferous</i>	The National Planning Policy Framework sets out the Government's national planning policies for England and how these are expected to be applied by planning authorities in the preparation of development plans, and in the determination of applications for planning permission. In circumstances where local planning policy is not in conformity with the National Planning Policy Framework, determination of planning applications must be made in accordance with this national framework for planning. Furthermore, Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities (which includes local authorities) in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or an Area of Outstanding Natural Beauty in England, to seek to further the statutory purposes of the area. This duty also applies to proposals outside the designated area but impacting on its natural beauty. The statutory planning system in England also allows considerable discretion to local decision-makers not only to draw-up their own local plans but also to weigh the various different relevant policies in deciding where the balance of the plan lies in any case, and also to depart from the plan where warranted. There is no presumption against development in AONBs, and appropriate development can be permitted within AONBs, although the National Planning Policy Framework requires the highest level of protection in relation to conserving and enhancing the landscape and scenic beauty of AONBs in relation to plans and planning decisions. The National Planning Policy Framework's position with regard to AONBs will assist local planning authorities to ensure that future development that occurs within an extended Surrey Hills AONB reflects the national importance of this designation.

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	<i>plantations, together with the area's vulnerability to loss of tranquillity arising from nearby activity and consented development. It is clear to [Anon] that the existing AGLV designation and other measures have unfortunately offered insufficient protection against these harms, notwithstanding the importance of the setting of the AONB is recognised under NPPF [National Planning Policy Framework] Paragraph 176. [Anon] is pleased to see that AONB designation is expected to bring additional funding, stewardship and permitted development rights restrictions to tackle the issues highlighted.'</i> ANON-VUXE-W5RF-C <i>'Because it is beautiful and designating it as AONB will lead to some protection.'</i> ANON-VUXE-W5WF-H <i>'Designating this area as AONB will preserve the areas [area's] natural beauty and protect from unsuitable development which could spoil the characteristics of this tranquil and naturally attractive area. It will also be a reason to limit overflying aircraft which in turn will increase pollution in this area.'</i> ANON-VUXE-W5QM-J <i>'It is important to ensure that the quality of any future proposed developments view or seen from the Area of [Outstanding] Natural Beauty respects the designation, discouraging developments such as that at Cane Hill [Park, Coulsdon].'</i> ANON-VUXE-W5E2-B <i>'This area of Surrey is slowly being developed to such an extent that the amount of wildlife that I knew as a child is</i>	The importance of the landscapes within the proposed extensions has been recognised in planning policies contained in the relevant local plans over many years. Furthermore, local plans have included policies reflecting the importance of Areas of Great Landscape Value within Surrey. Many of the Local Plans therefore reference the review of the Surrey Hills AONB Boundary as well as the review of the AGLV after the AONB Boundary Review is completed. Natural England's reasons for proposing to extend the boundary of the Surrey Hills AONB are not based upon any adverse judgement of the effectiveness of the existing local planning authorities in the areas concerned, nor does Natural England have any desire that AONB designation should 'stop development' as suggested in some responses. These areas have been identified because of their natural beauty, which is, in part, a consequence of the good quality planning control exercised over many years by the planning authorities. Designation would ensure that the statutory duties and powers associated with an AONB apply, and that particular account is paid to the area's natural beauty, including special qualities and other key characteristics, when planning for future development in the extension areas, adding weight to the case for designation.

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	<i>diminishing at an alarming rate and anything that we can do to prevent any more decline in wildlife is of long term benefit to future generations.'</i> ANON-VUXE-W57Z-5 <i>'Needs to be protected from inappropriate development.'</i> ANON-VUXE-W5RZ-Z <i>'The threat of any future large scale development needs to be alleviated by granting added protection to this lovely area.'</i> ANON-VUXE-W5MU-P <i>'To protect it from change. Pressure from developers to destroy much of this important area despite opposition from local residents and the local council.'</i> ANON-VUXE-W545-W <i>'This area should not be allowed to be built on to protect the wildlife and bio-diversity of the area. If it is lost then it will never be recovered.'</i> ANON-VUXE-WEBE-B <i>'We would also like to see extra powers being made available to local authorities to protect against inappropriate development for commercial gain.'</i> ANON-VUXE-W5RZ-Z <i>'The threat of any future large scale development needs to be alleviated by granting added protection to this lovely area.'</i> ANON-VUXE-WMNQ-B <i>'These views should be kept for future generations and not be obliterated by development. The Hogs back is under threat</i>	

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	<i>from all sides especially Guildford. If Surrey university had there [their] way it would be developed along it's north face. We are loosing so much open space and farmland to developers it needs to be halted.'</i> ANON-VUXE-WESY-G <i>'AONB status would help secure these views from creeping development and maintain the special nature of the area.'</i> ANON-VUXE-WEF9-3 <i>'The views would be forever changed if these areas are not designated as AONB. The boundary would protect against development of local heritage.'</i> ANON-VUXE-WM6Y-U <i>'Some of the fields around Wanborough have been packaged and sold as small plots, with particularly unsympathetic development in land that is currently AGLV. Guildford Borough Council and the local community have fought this kind of development and designation to AONB is likely to help control this in future (note that the land sold as small plots in the AONB area has avoided illegal construction and activities, although it may still develop as a patchwork of uses - the bulk of which to date has been tree planting).'</i> ANON-VUXE-WMTK-B <i>'It is [a] constant battle to keep from people wanting to build/erect fences/shed on some of the fields in Wanborough and if it were to be included in the AONB this would offer another level of protection to this very scenic part of Surrey.'</i> ANON-VUXE-WEWY-M <i>'This area is already starting to experience the creation of</i>	

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	<i>leisure plots, ad-hop [ad hoc] development which is visually intrusive or fragments the landscape pattern.</i> <i>In particular there is a fear in this community that there could be a loss of the visual simplicity of the open slopes along the hogs back due to land use change. A change to this special topographic feature would have a very negative impact on many levels.'</i> ANON-VUXE-WEV2-C <i>'The area needs protection from housing development impinging on beautiful countryside. Too many large developments have been built around Tongham and Ash. Further protection of the area as countryside is vital. Further expansion would be desirable before any more areas are lost to development.'</i> ANON-VUXE-W5XD-G <i>'We want to protect every part of the area we have lived in for 55 years. No more housing or any other development. Traffic is too much as it is, even on Sunday.'</i> ANON-VUXE-W5SR-S <i>'to safeguard the wonderful views - these can extend for many miles. We dont want these views spoiled by developments which have little or nil oversight by an external organisation, or without consultation with the local community.'</i> ANON-VUXE-WMP4-G <i>'Increasing development has the potential to impact this area leading to the compromise or loss of an excellent rural habitat'</i> ANON-VUXE-WEBF-C	

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	<i>'because development would destroy the character of the surrounding area'</i> ANON-VUXE-WEZJ-8 <i>'Gaywood Farm has submitted plans (see 2022/1240 on Tandridge DC Planning website) to build 42,000 solar panels on 61-acres of land just a few hundred metres from Staffhurst Wood - woodland that has been classed as a Site of Special Scientific Interest. Including the whole area in the AONB would give it better protection.'</i> ANON-VUXE-WMH4-8 <i>'This area should be protected from development'</i> ANON-VUXE-W5BU-B <i>'As an experienced architect I am pleased to see the natural beauty of the Dunsfold area being recognised through the proposed extension even though in my view it may result in the inclusion of some peripheral areas that don't necessarily all make the same level of contribution to the quality of landscape. I hope designation will lead to the achievement of a high standard of design for proposed developments, and I certainly intend to take a leading role in ensuring this quality can be delivered.'</i> ANON-VUXE-WE5K-4 <i>'Given the pressures of increasing population, traffic volumes and the ever increasing need for housing and industrial expansion it is truly crucial that this stunningly beautiful landscape is protected and preserved for future generations. Giving AONB status to Dockenfield Hills will help to ensure we don't lose [lose] this idyllic, quintessentially English, ancient agrarian landscape through careless development and over</i>	

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	<i>urbanisation.'</i> ANON-VUXE-WEVM-7 <i>'With the pressure from a growing population in the south of England for more house building, leading to busier roads and loss of rural character, it is imperative that we attempt to preserve more of what little truly traditional countryside we still have left.'</i> ANON-VUXE-WERD-T <i>'It is therefore vital to designate the proposed area, which would otherwise be vulnerable to development which would adversely affect the beauty of both the Dockenfield Hills and the surrounding, already protected, areas.'</i> ANON-VUXE-W5XG-K <i>'The area is under considerable pressure from development. The road from Frensham to Dockenfield has seen a succession of attempts to build on the fields, which would have resulted in ribbon development and the destruction of the unique character of this area. Similarly, despite the Gault Clay meaning that keeping horses is impractical, there have been several attempts to turn agricultural land into equestrian businesses.'</i> ANON-VUXE-W53F-D <i>'Without this designation there is a risk that development will have a major detrimental effect on the area. As more people are now working from home we have seen an increase in the demand for property in and around Dockenfield. New large buildings, large extensions to existing buildings and modern developments would spoil a beautiful area.'</i>	

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	ANON-VUXE-WEMU-6 <i>'Designation as AONB would also help retain this tranquil rural village character by protecting it from the urbanisation that is rapidly expanding southward from Farnham and its suburbs.'</i> ANON-VUXE-WET1-9 <i>'Environment alone to [in] much of out[r] countryside is being eaten up by housing developments. [Designation should] safe guard more of our beautiful countryside.'</i> ANON-VUXE-WMF2-4 <i>'Protection of environment, the ancient woodlands, the views of the landscape, ensuring appropriate planning laws, and preventing inappropriate development.'</i>	
Proximity to conurbations and access	ANON-VUXE-WEZ4-J <i>'easy access from Coulsdon South station and buses along Coulsdon Road and Marlpit Lane, would help make this extension an opportunity to broaden access to the wider AONB.....securing the most deserving parts into the Surrey Hills AONB would help raise the value of its landscape close to urban communities, many of which are concerned about the threats to its integrity, as well as its cultural, ecological and amenity interests.'</i> ANON-VUXE-W5ET-D <i>'Proximity to more built up areas mean it is a vital part of the Surrey Hills, and delivers a wonderful change of environment... Easily accessible to large numbers of people via public transport.'</i> ANON-VUXE-WMMT-D <i>'It is an outstanding resource and loved by many - including</i>	<u>Commentary</u> In undertaking the review of the Surrey Hills AONB boundary, Natural England has been mindful of the importance of landscape close to centres of population. However, Natural England, in following the Natural England Guidance is also clear that only land which has sufficient natural beauty can be designated as a National Landscape irrespective of its geographical location. Natural England is pleased to have identified qualifying land that extends close to the southern outskirts of Greater London and recognises the value of this landscape to local residents.

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	<i>walking groups who make use of the amazing trails.'</i> ANON-VUXE-WEJ3-1 <i>'It provides an area for people to continue coming here to enjoy sporting activities, including walks, cycling and horseriding, as well as leisure activities whilst appreciating the beauty of the surroundings, taking in the stunning views and benefitting from some fresh air.'</i> ANON-VUXE-WSQV-S <i>'It is safeguarding tracts of countryside which have special value and should be kept safe for the pleasure of walking, relaxation and protection of wildlife in all its many forms.'</i> ANON-VUXE-W5WT-Y <i>'During lockdown it became even more popular for people to walk in and to mentally refresh themselves. The more areas we have like this the better for our wellbeing. We need to utilise these areas to enable people to connect more with nature and to start to understand our place in the world again. These areas need to be used for education purposes.'</i> ANON-VUXE-WMZF-C: <i>'The areas close to London, such as chipstead, happy valley, etc, are very much at risk of urban spread and high usage by a denser population. As such they need the extra protection given by this special status. Please, please, please approve these plans to protect this vulnerable environment.'</i> ANON-VUXE-WMSQ-G <i>'It's value lies both in the natural beauty, but also in the increased rarity and the closeness to the urban areas which</i>	

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	<i>are losing / have lost their natural beauty'</i> ANON-VUXE-WMSZ-S <i>'It has contributed [contributed] to my mental and physical wellbeing for the 76 years I have lived adjacent to it's boundary and I hope will continue to do so for countless other people in the future. During the Covid pandemic we have all become aware of the importance of open spaces for our mental health as well as our physical well-being.</i> <i>The areas designated for inclusion (Chipstead Valleys, Banstead Woods and Happy Valley) are accessible by many living within local urban development and are extremely popular. However, in order to maintain their unique beauty, they need to have the added protection that the extension to the Surrey Hills boundaries would help to give.'</i>	
Future of remaining AGLV is uncertain and therefore should also be designated	ANON-VUXE-WEV3-D <i>'Areas which have AGLV status, which are not included in the extended AONB will have an uncertain future, as Green Belt protection is not enough to protect valued countryside. Surrey and its neighbouring London authority may therefore see a reduction in valued landscapes and particularly with the geography of the AGLV and Green Belt of Warlingham, Chelsham and Farleigh, which currently acts as a buffer to the existing AONB and prevents urban sprawl into Surrey.'</i> ANON-VUXE-WEZC-1, ANON-VUXE-WEW5-G and ANON-VUXE-WSKG-4 Respondents raised concerns regarding some parcels of land designated as AGLV not being incorporated in the boundary extension and that the protection afforded by the AGLV will fall away.	<u>Commentary</u> The Natural Beauty Assessment Report states at paragraph 3.3.9 <i>'Given that there is little information on the criteria used to define the AGLV in the 1970s or 1980s, and that the definition of locally valued landscape does not necessarily equate to landscape of national significance, it has not been assumed in this study that landscape with AGLV status will necessarily meet the Natural Beauty Criterion for designation as AONB. The areas of AGLV are, however, a useful starting point to the boundary review.'</i> It goes on to state at paragraph 4.1.2 that <i>'the areas covered by the AGLV were used as a basis for identifying an initial Area of Search for consideration.'</i> The subsequently defined Evaluation Areas, which include AGLV along with some land outside of this designation, have been tested against the Natural

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	ANON-VUXE-WS11-M <i>'I have severe reservations about some parcels of land designated as AGLV not being incorporated especially as once they are not included in the new extended AONB their current level of protection will fall away.</i> <i>Most have been assessed as of [ef]worthy from the point of reference of the majority of key considerations for AONB status.'</i> ANON-VUXE-WS13-P <i>'It also does not seem logical to exclude existing Areas of Great Landscape Value (AGLV) along with some significant areas of ancient woodland in preference to using some very dubious boundaries such as hedgerows which will only serve to confuse current and future generations.'</i>	Beauty Criterion to determine if they are worthy of national landscape designation. It is not the purpose of the Surrey Hills AONB Boundary Review to determine what should happen to the remaining areas of AGLV, which are not considered to meet the Natural Beauty Criterion, post designation (Desirability Assessment Report Para 5.4.3), however the wording in paragraph 182 of the National Planning Policy Framework (Dec 2023) highlights the importance of the setting of nationally protected landscapes. This is set out in the Desirability Assessment Report at paragraph 5.4.3 which states <i>'Post designation much of the remaining AGLV, and indeed some areas of wider countryside, will form the setting to the AONB.</i> <i>The outcome of the Surrey Hills AONB Boundary Review may provide an opportunity for a review of the AGLV by local planning authorities taking account of:</i> <i>• Attractive, valued landscape which contribute to the immediate setting (and therefore the natural beauty) of the AONB; and</i> <i>• Other attractive, valued landscapes which are not part of the AONB setting but are nonetheless locally valued.'</i> In proposing a boundary, Natural England follows Appendix 4 of the Natural England Guidance. This notes that wherever possible an easily distinguishable permanent physical boundary should be chosen. In many cases Natural England considers the use of hedgerows to be appropriate.
Desirable to bring in land beyond the proposed Extension Areas in order	Many of the representations which sought inclusion of additional land advanced arguments relating to the need to fulfil Government's National Policy on 'joining up' protected areas, and enriching wildlife value. Many of the responses focused on a much wider extension of the boundary southwards as far as the High Weald but also included smaller	<u>Commentary</u> <u>Natural England Guidance predates the 2019 Landscape Review led by Julian Glover</u> Natural England Guidance, whilst predating the Landscape Review led by

Desirability Theme in Support of Designation	Representations	Natural England Commentary
to help fulfil Government National Policy on nature recovery and combat climate change	extensions in areas such as Tongham and Runfold. Key issues raised by respondents in relation to the Glover Review include: - Natural England Guidance on Assessing Landscape for Designation predates the Glover Review. - Landscape Review led by Julian Glover recommended that National Landscapes should form the backbone of Nature Recovery Networks – joining things up within their boundaries. Key issues raised by respondents in relation to the importance of the Lawton Review include: - Recommended enhancing connection between existing wildlife sites – bigger, better and more joined up. Examples of the responses are provided below: ANON-VUXE-W5RY-Y <i>'Although this review is being undertaken in the context of the Government's 25 year environment plan, which highlights the importance of more biodiverse AONBs, insufficient account appears to have been taken of the biodiversity opportunity afforded by the boundary extensions. In particular, the Wey Valley extension must include the Runfold landscape EA 1b, which has been sensitively restored to agriculture (not leisure as incorrectly assumed in the assessment), and has planning obligations for biodiversity improvement which can be further protected and enhanced by inclusion in the AONB.'</i> ANON-VUXE-WS1F-9 <i>'NE [Natural England] has missed an opportunity to take action</i>	Julian Glover, reflects current legislation in relation to the designation of National Parks and AONBs. It is important to note that there has been no change to legislation since the Landscape Review and no change to the wording in the statute that enables land to be designated as either National Park or AONB. The Natural Beauty Criterion must be met for land to be considered for designation and the factors used to determine the presence of natural beauty have been tested at numerous public inquiries. Natural England is exploring innovative approaches to future landscape designations that support the Government's Environment Improvement Plan 2023 ambitions. However, the current programme of landscape designations that Natural England is working on must follow the existing legislation. Therefore, the use of the Natural England Guidance, which relates directly to the words of the statute, remains sound. Natural England does not accept that this approach is out of date. <u>Conflation of designation criterion and purposes of designation</u> There is a clear distinction between the statutory technical criterion for designation as AONB which is set out in Section 82(1) of the Countryside and Rights of Way Act 2000 (CRoW) which states that an AONB is <i>'an area which is not in a National Park but which appear to Natural England to be of such outstanding natural beauty....'</i> and the purpose of AONB designation which is to <i>'conserve and enhance natural beauty'</i>. Under the purpose of designation, AONBs can develop policies to support the enhancement of nature and to implement the principles of the Lawton Review. However, the potential to enhance nature is not a reason for designation in and of itself; as noted in the Natural Beauty Assessment Report (para 1.4.3). Land must meet the Natural Beauty Criterion for it to be designated as AONB. Furthermore, the assessment of natural beauty is based on the current condition of the landscape not some future potential unless it is a current initiative which will deliver positive change of a standard which will meet the

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	<i>to support Nature's Recovery.'</i> ANON-VUXE-WEJ4-2 <i>'I believe to ensure species biodiversity long-term we should create an uninterrupted AONB that extends to the High Weald.'</i> ANON-VUXE-WES8-F <i>'I support the proposed extension of the Surrey Hills AONB but the Limpsfield boundary should be extended southwards so as to be consistent with national policies to make protected areas 'bigger, better and more joined up' and to increase the quality and quantity of wildlife.'</i> ANON-VUXE-W5MG-8 <i>'The candidate area is not large enough in scope. I am concerned that there has not been sufficient regard paid to the recommendations of the 2010 Lawton review and the 2019 Glover report [Review].</i> <i>It appears that national policies on connectivity and increasing the quality and quantity of wildlife in AONBs have been ignored. This should be remedied by extending the boundary southward to join the High Weald AONB East of Lingfield and to the Eden Brook to the west, thus taking in the bulk of the River Eden Biodiversity Opportunity Area and the Blindley Heath and Staffhurst Wood SSSIs..'</i> ANON-VUXE-WSK9-P <i>'The Surrey Hills AONB Boundary Review is in danger of missing an unprecedented opportunity to put important national policies into practice, by appearing to ignore the commitment of both the Government and Natural England to ensure greater connectivity between protected areas and to</i>	Natural Beauty Criterion within the short term (para 6.10 of the Natural England Guidance). <u>National Landscapes and Nature Recovery</u> The Surrey Hills AONB Partnership, in collaboration with the AONBs landowners and managers, have developed a Nature Recovery Strategy which will run from 2021-2031. This strategy aims to make more space for nature and includes details on how the AONB will deliver on its nature recovery targets, how it will work collaboratively and how the strategy will be funded. It also makes a commitment to work across its borders to ensure that the knowledge and the impact of the AONBs activities reach beyond its boundary. The Surrey Hills AONB, along with the Kent Downs and High Weald AONB, have opportunities to work within a wider area beyond their AONB to further nature conservation objectives, even though this land itself may not be designated. Natural England therefore does not agree that the need to meet Government policy on nature recovery and climate change should result in any extension of the AONB boundary into land that does not meet the Natural Beauty Criterion. However, Natural England is of the view that where land does meet the Natural Beauty Criterion, and can form part of an extension to the Surrey Hills AONB, that the additional benefits that flow from designation can directly contribute to these aims (as noted above).

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	<i>enhance the quality and quantity of nature and wildlife within them.</i> <i>The consultants who prepared the documents thus appear to have adopted an out-of-date approach to designating AONB Landscapes.</i> <i>Such danger would be compounded by the Natural Beauty Assessment's dismissal of the very area whose inclusion would fulfil those policies by connecting the Surrey Hills and High Weald AONBs, and taking in the River Eden Biodiversity Opportunity Area and the Blindley Heath and Staffhurst Wood sites of special scientific interest and local nature reserves. In the course of doing so, it appears to go beyond the necessarily subjective into exaggeration, inaccuracy and possible misrepresentation.</i> <i>The consultation documents fail to take account of the policies of the Government and Natural England to increase both connectivity and the quality and quantity of nature and wildlife in protected areas like AONBs. Moving the proposed boundary of the extended Surrey Hills AONB southwards to the Eden Brook and the border of the High Weald AONB would remedy this – and there is no reason for failing to do so since the Natural Beauty Assessment's verdict that this area does not meet the required criteria is based on inaccurate information and faulty judgement.'</i> ANON-VUXE-WESP-7 <i>'I feel the proposed extension should go much further and be extended as far as the High Weald AONB. In doing so there is an opportunity to forge a connection to the High Weald AONB – as encouraged by Government guidance - and to embrace</i>	

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	<i>the Surrey Bio-diversity area of the River Eden and its tributaries.</i> <i>In that regard, the 2019 Glover Review is hugely important as it highlighted the fragmentation of the existing National Parks and AONB and the resultant diminished ambition. Specifically it included this recommendation (accepted by government):</i> <i>Proposal 4: National landscapes should form the backbone of Nature Recovery Networks – joining things up within and beyond their boundaries</i> <i>The earlier 2010 Lawton review concluded that “there is compelling evidence that England’s collection of wildlife sites are generally too small and too isolated, leading to declines in many of England’s characteristic species.” It recommended enhancing connection by creating new wildlife corridors or stepping stones.</i> <i>And Natural England itself highlighted the slow progress on implementation of the Lawton review in its blog Making Space for Nature – 10 years on.</i> <i>Extending the AONB further south to link up with the High Weald AONB – which can be done both in Godstone Hills and Limpsfield – would help meet this crucial objective. And importantly, I believe there is no significant difference in the natural beauty and quality of the land south of the railway line from land to the north of it.’</i>	

Desirability Theme in Support of Designation	Representations	Natural England Commentary
Desirable to bring in land beyond the proposed extension to improve access and wellbeing	ANON-VUXE-WSK1-E felt that a crucial opportunity is being missed to incorporate areas of high landscape quality in their own right that can also serve to bring the AONB closer to more people in Guildford. ANON-VUXE- WENZ-C <i>'The South East is a built-up area, and many local people do not have access to landscape and natural beauty of this kind. Access to such areas has both mental and physical advantages. By including the rising land in the western and northern approach to the AONB, it will enhance the lives of many and protect it for the enjoyment of generations to come.'</i> ANON-VUXE-WEPM-1 <i>'The mental health of residents in Tongham, Ash, and even villages/towns further away is improved by having access to natural green areas of such a size. Several scientific studies in the last 10 years have proved beyond doubt that being immersed in nature makes a significant improvement on mental health, and can reduce stress. (Indirectly this also reduces load on the NHS.)'</i> ANON-VUXE-WEEK-M <i>'Designating Hogs Back as an Area of Natural Beauty encourages responsible and sustainable tourism. It presents an opportunity for visitors to connect with nature while promoting eco-friendly practices. Controlled access, designated trails, and visitor education initiatives can be implemented to ensure minimal impact on the environment. Encouraging sustainable recreation in Hogs Back and Wey Valley fosters a sense of environmental stewardship, benefiting both the local economy and the wider community. More should be done to encourage this, such as the good work</i>	<u>Commentary</u> Natural England recognises the importance and delivery of access to good quality natural greenspace near to where people live through Accessible Greenspace Standards and Green Infrastructure Strategies. The demonstrable and positive impact that 'cherished landscapes' can have on mental health is also recognised in the Surrey Hills AONB Management Plan 2018-2023. Section 2.5 of the Plan covers Health and Social Wellbeing and makes reference to the excellent recreational opportunities within the existing AONB which can support healthier lifestyles, as well as to the opportunities to volunteer for environmental and societal projects which can also support good mental health and engender community spirit. In order for land to be designated as AONB it must meet the Natural Beauty Criterion. It is not possible to include land within a national designation simply because it lies in close proximity to centres of population or improves access to landscape which improves wellbeing. It should be noted, however, that several of the proposed Extension Areas do physically connect to nearby urban and semi-urban areas. Natural England recognises and appreciates the positive role that AONBs can play in providing a range of physical and mental health benefits for people, alongside other benefits for natural beauty and biodiversity. The Surrey Hills AONB is no exception and there are numerous examples of the range of activities which contribute to the health and wellbeing of people, and which are provided under the auspices of the AONB Team. It is reasonable to expect that if the proposed Extension Areas are confirmed then such benefits, where appropriate and feasible, will also accrue to local residents and visitors in these areas.

Desirability Theme in Support of Designation	Representations	Natural England Commentary
	<i>being done to bolster Ash Meadows.'</i> ANON-VUXE-WEU4-D <i>'There are great pressures on land use in the South East and this will only grow with the population. However, whilst the focus is often on housing, the importance of well-being is often over looked. Extending the AONB and protecting this landscape will provide focus for the well-being of people who wish to access such areas of great beauty. It will also provide a framework for the sympathetic development of housing in the South East. An enhanced status of natural beauty will provide a further level of protection to ensure future generations can continue to enjoy this precious landscape accessible to residents from nearby urban and semi-urban areas.'</i>	

Table B: Desirability Responses Against Designation

Desirability Theme Against Designation	Representations	Natural England Commentary
Dilution of the Brand	ANON-VUXE-WEBP-P <i>'The existing Aonb area is poorly managed, and increasing its size will make this worse. When the existing Aonb is well managed it should then consider including other areas.'</i> ANON-VUXE-WE2Z-G <i>'Some areas of the Surrey Hills are attractive but there are many areas which do not really have and [a] difference in character to other areas which are not included.'</i> <i>Expansion to include areas of lower quality will end up diluting the overall landscape quality and potentially lead to an increase in pressure on the areas that are of a higher quality.'</i> ANON-VUXE-WSKF-3 <i>'The [Anon] believes it is only desirable to designate additional areas of land if they can be shown to be the very finest. The [Anon] is concerned that some of the proposed boundary extensions do not qualify as having sufficient natural beauty for AONB status. In some cases, the features are not even present.'</i> ANON-VUXE-WSKK-8 <i>'AONBs are protected areas because of their beautiful countryside, wildlife and cultural heritage. To extend the Surrey Hills AONB by nearly 25% would undermine the rationale for designating them in the first place. If the majority of the countryside in Surrey is designated it would dilute the special nature of these areas.'</i>	Commentary: Land which has been proposed for designation has been identified through detailed landscape evaluation and testing of the landscape against the natural beauty factors set out in the Natural England Guidance. The justification for including land is set out in detailed evaluation tables, to provide transparency in reasoning. Natural England Guidance states that 'Not all [natural beauty] factors or indicators have to be present across a designation. Different parts of a designation can satisfy the natural beauty criterion for different reasons, provided that overall, the area is of sufficient natural beauty to be designated as a National Park or an AONB.' Furthermore, the Natural England Guidance states that when applying the technical criterion of natural beauty it is not appropriate to do so on a 'field by field' basis (paragraph 5.3 4th bullet). The assessment process also requires consideration of the desirability to designate. This takes account of the special qualities of the qualifying land, consensus as well as rarity and representativeness. This adds further weight to the strength of evidence supporting recognition of the proposed Extension Areas, as part of the wider Surrey Hills AONB. Natural England does not accept that the proposed Extension Areas will damage or undermine the Surrey Hills AONB designation as a whole.

Desirability Theme Against Designation	Representations	Natural England Commentary
Inadequate resourcing	ANON-VUXE-WSKF-3 <i>'Boundary extensions to Surrey Hills AONB should not go ahead if responsible bodies are not adequately resourced and funded to support the communities, environment, and businesses the AONB is meant to serve.</i> <i>Funding for AONBs has been cut by 36% over the past decade. The Surrey Hills AONB boundary variation proposes a 25% expansion of the AONB with no additional resources to manage it. The [Anon] is concerned this will lead to poor outcomes for nature, reduced support for landowners, and increased delays for planning applications.'</i> ANON-VUXE-W5WY-4 <i>'The Surrey Hills AONB planning department is already over-stretched, inefficient and ineffective. There is a good argument for areas of AONB to be reduced in this area to enable the department to manage those areas under its jurisdiction more effectively.'</i>	<u>Commentary</u> The Surrey Hills AONB currently receives up to 75% funding from Defra for its core staff unit costs and a percentage contribution from the relevant local authorities who have land within the designation. Any additional funding for the proposed Extension Areas to the Surrey Hills AONB will be subject to a future Government spending review. All Local Authorities, within the existing AONB and those in the newly extended areas, will be expected to provide an appropriate level of funding to contribute to the effective delivery of the AONB's statutory purpose to conserve and enhance the landscapes special qualities and natural beauty. Responsibility for land management within an AONB lies with the landowner and remains unchanged post designation. In meeting the purpose of designation, the Surrey Hills AONB works closely and collaboratively with local landowners and businesses in order to conserve and enhance the special qualities of the landscape. Several funding schemes led by the Surrey Hills AONB, including Farming In Protected Landscapes, provide additional support to landowners and farmers, and any new land that is to be included in the AONB would have direct access to these resources.
Areas are already protected in planning terms	ANON-VUXE-WMWH-B and ANON-VUXE-WSR7-U <i>'Green belt is a well trodden & robust planning law that protects most of what the supporters of AONB want. There is no need for it.'</i> ANON-VUXE-WMPQ-D <i>'The current planning legislation provides sufficient protection of the land in question to prevent inappropriate development. There is no requirement to expand the AONB to this area. It's</i>	<u>Commentary</u> National planning policy related to Green Belt is not the same as that associated with AONB Designation. The purpose and function of these is not the same, but may geographically overlap. The identification of land as Green Belt is not a consideration when assessing land for designation as AONB. Furthermore, the perceived need to protect land from development is not a justification for identifying land for

Desirability Theme Against Designation	Representations	Natural England Commentary
	<i>[Its] current designation as green belt is sufficient. Protection against development is already sufficient under current planning restrictions as it is a green belt site.'</i> ANON-VUXE-W5T8-Z <i>'designation of the area as AONB is not necessary given existing policy associated with AGLV, Green Belt and the Dunsfold Conservation Area.'</i> ANON-VUXE-W5WY-4 <i>'Local Plan policies already stipulate that AGLV should be offered the same protection as the AONB and therefore, no further protections are required.'</i>	designation. When determining land for designation, consideration is given to the statutory technical criterion of natural beauty. In relation to AGLV, this is a local landscape designation which remains extant within relevant Local Plans. Local landscape designations give an indication that an area is valued for its landscape qualities, but it does not necessarily mean it has an equivalence to nationally recognised landscapes. This is reinforced at paragraph 5.4.3 of the Desirability Assessment Report, which states <i>'Designation as AONB of parts of the AGLV which meet the natural beauty criterion would enable additional planning policy and development control protection to be applied, ensuring that the special qualities of qualifying areas are conserved and enhanced into the future.'</i> Natural England does not agree that current planning legislation associated with other landscape, natural or cultural designations addresses the conservation and enhancement of landscape where it meets the Natural Beauty Criterion. Furthermore, local landscape designations such as AGLV by definition are not recognised as being nationally important, and do not afford the same opportunities to conserve and enhance the natural beauty of the area as AONB designation. This is reflected in response ANON-VUXE-WSK2-F (Guildford Borough Council) which stated <i>'Whilst the Area of Great Landscape Value (AGLV) designation has helped to act as a buffer to the AONB and provide some additional protection, its status as a local designation carries less weight. Furthermore, it has been demonstrated through the work undertaken by Natural England that some land within Guildford that lies outside the AGLV designation has been found to fulfil the criteria for AONB designation. This demonstrates the value of this process in protecting this valuable landscape.'</i> Once designated as AONB, the National Planning Policy Framework requires

Desirability Theme Against Designation	Representations	Natural England Commentary
		that great weight is given to the purpose of designation i.e. the conservation and enhancement of natural beauty when making planning decisions. Furthermore, Section 245 (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 places a duty on relevant authorities (which includes local authorities) in exercising or performing any functions in relation to, or so as to affect, land in a National Park, the Broads or an Area of Outstanding Natural Beauty in England, to seek to further the statutory purposes of the area. This duty also applies to proposals outside the designated area but which impacts on its natural beauty. The presence of other landscape and biodiversity designations within the proposed Extension Areas provide further justification for designation as AONB, as it is evidence that the area has long been considered of value for its landscape and biodiversity, and thus contributes to the strength of evidence that designation is desirable.
Increased Regulation and Restrictions	ANON-VUXE-WMWH-B and ANON-VUXE-WSR7-U <i>'More regulations & more laws only restrict movement, enterprise & community living.'</i> and <i>'Planning becomes much more restrictive for perfectly reasonable planning applications.'</i> ANON-VUXE-WM5T-N <i>'I believe the land is very well looked after by the current landowners and farmers and the restrictions that will be imposed if it become[s] AONB will make their lives more difficult.'</i> ANON-VUXE-WEUH-1 <i>'There seems to be no real attempt to understand or engage with what we are doing/are trying to do as a business or interest in the regulatory impact an AONB designation would have on us. We face numerous problems presently –among which are Brexit, loss of BPS, labor [labour] shortages and</i>	<u>Commentary</u> AONB designation does not impact the current practices or business of landowners, farmers and other enterprises. There is little change in the powers of Local planning authorities to affect farmed and managed land within an AONB and the wider countryside. Local planning authorities do not have powers to direct activity, nor specifically to restrict use of private or public land in AONBs. They cannot, for example, compel a particular type of business activity or land use on farmland. There should therefore be no reason for any landowner or business to change their current land use or other business activity as a consequence of designation. However, the purpose of designating land as an AONB is to protect and enhance the natural beauty of that landscape and therefore any development or land management changes that might impact this will require the relevant local planning authority to have regard to the purpose for which AONBs are

Desirability Theme Against Designation	Representations	Natural England Commentary
	<i>climate change. The last thing we need is an ill thought out AONB designation on top of this.</i> <i>Also assessing areas of land based on definitions of 'beauty' alone ring hollow when an AONB designation has very serious long term regulatory implications on an area and the businesses and people who live and work in it. There appears no real assessment or care in what those might be. A better approach would be to adopt a growth plan for an area in conjunction with a plan to protect and enhance its natural beauty.</i> <i>.....a more comprehensive review should take place by way of a Public Enquiry [inquiry] to ensure appropriate testing of the evidence base for the proposed changes is put to expert examination by independent and appropriately qualified landscape consultants, and other expert witnesses to properly assess the regulatory burden.'</i> ANON-VUXE-WM5T-N <i>'restrictions that will be imposed if it become[s] AONB will make their [current landowners and farmers] lives more difficult.'</i> ANON-VUXE-WSKF-3 <i>'AONB designations bring severe planning restrictions that impact businesses, mainly because environmental considerations often overrule economic and social considerations in decision-making processes. This effect places businesses and communities within designated areas at an unfair disadvantage to those outside these artificial boundaries.'</i>	designated when determining development proposals. References to regulation and bureaucracy from respondents are therefore likely, in practice, to relate to perceptions with regard to planning management. Responses specifically with regard to town and country planning are dealt with below. Designation can bring additional access to advice and potentially grant aid (for example resources for undergrounding power lines). Other schemes and support led by the Surrey Hills AONB partnership will also be available to any new landowners, farmers or businesses that are included in the AONB.

Desirability Theme Against Designation	Representations	Natural England Commentary
Planning and Need to Meet Housing Supply	ANON-VUXE-WMWH-B and ANON-VUXE-WSR7-U <i>‘Surrey is in desperate need for more housing starts, as we are well below the government targets for new housing. This will restrict this.’</i> ANON-VUXE-WEX6-J Key issues raised are summarised as follows: • Designation would introduce an additional constraint on the provision of new housing in an area where there is undersupply and unaffordability. • Desirability Assessment Report paras 5.4.1. and 5.4.5 notes designation of land as AONB gives greater planning protection against housing development. • Expansion of the AONB risks diminishing the potential of Surrey local authorities to meet their communities’ housing and infrastructure needs. • Proposals risk exacerbating the housing crisis. ANON-VUXE-WEUH-1 <i>‘I’m concerned that whats [what’s] really going on is that NE [Natural England] are doing the government’s bidding in trying to prevent windfall housing developments in what is designated in the Mole Valley Local Plan as “the area beyond the green belt” by rushing in the constraint of an AONB. The threat of windfall housing is there because the Mole Valley Local Plan hasn’t come into being yet because it hasn’t resolved its shortfall in housing numbers in relation to its original assessed housing need set out in its SHMA [Strategic Housing Market Assessment]. So they’re asking the businesses in this area to shoulder the regulatory burden of an AONB, in order to keep new housing numbers down to keep Mole Valley Conservative at the next General Election.’</i>	<u>Commentary</u> Government planning policy since 2012 in the National Planning Policy Framework has set out how planning policies and decisions can help deliver sustainable development. This applies within National Parks and AONBs as elsewhere. The National Planning Policy Framework (Dec 2023) maintains the highest level of protection in relation to conserving and enhancing the landscape and scenic beauty of AONBs, and includes a limited number of specific policies restricting development within them. Importantly, the National Planning Policy Framework does not prevent appropriate, sustainable development being granted permission e.g. affordable housing for local needs. The National Planning Policy Framework includes a specific AONB policy at paragraph 183. This sets out the highest status of protection for landscape and scenic beauty in National Parks, the Broads and AONBs. It also states that the scale and extent of development within these designated areas should be limited and that major development should be refused other than in exceptional circumstances and where it can be demonstrated that the development is in the public interest. Nevertheless, appropriate development within AONBs can provide an opportunity to secure environmental gains as well as meeting local economic and social objectives. Policies elsewhere in the National Planning Policy Framework which relate to AONBs and which provide that development should be restricted are: • Footnote 7 to the paragraph 11 presumption in favour of sustainable development which includes AONBs as an area or asset of particular importance; • with regard to community-led development exception sites (footnote 37, para 73); and

Desirability Theme Against Designation	Representations	Natural England Commentary
	ANON-VUXE-WEW3-E Key issues raised are summarised as follows: - Many local authorities have failed to meet strict Government targets for housing and residential development is more challenging to unlock due to the presence of strategic policy protection such as Green Belt. The proposed boundary extensions have significant implications on housing delivery across the 6 local planning authorities bordering the Surrey Hills AONB. Significant reduction in the amount of land available for development – by allowing the extension to the existing AONB boundaries across the Surrey Hills, there would be a significant reduction in land availability with local planning authorities who are already unable to meet their 5-year housing land supply. - Extension of the AONB boundary can also result in more stringent planning restrictions and can make it harder for developers to obtain planning permission for housing projects...leading to delays and higher costs. Loss of Class Q permitted development rights affecting conversion of agricultural buildings resulting in reduced flexibility and adaptability of farmers to respond to changing market conditions, environmental challenges or technological innovations and diversification. ANON-VUXE-WEXE-1 <i>'The issue is the balance of Reigate and Banstead, with much of the unbuilt Northern half being designated AONB then the Southern half will be forced to take the lions share of any future development which in turn will lead to overdevelopment.'</i>	in relation to the provision of landbanks of non-energy minerals (para 217). Other policies in the National Planning Policy Framework, for example those supporting rural housing where it will enhance or maintain the vitality of rural communities, restrictions on the development of isolated homes in the countryside, enabling sustainable rural tourism and leisure developments which respect the character of the countryside and encouraging high quality design, apply in AONBs, as they do elsewhere. The National Planning Policy Framework policies should be read as a whole in order to deliver sustainable development which meets the needs of local communities. Statutory development plans covering AONBs set out policies to provide for appropriate development within AONBs which conserves and enhances the designated area whilst meeting local needs for housing and other development, in line with the National Planning Policy Framework. Natural England is aware of the pressure for housing within the southeast generally, and within Surrey specifically, however it is not for Natural England to determine any balance of national policy. Natural England does not make decisions to designate land based upon the impact of other central Government policy. For this reason, Natural England does not consider the impact of designation on achievement of current approved planning policy and targets during the designation process. Natural England relies on statutory planning authorities to raise these concerns and no representations from a statutory planning authority has been received to this effect. Furthermore, if designation of the proposed AONB extensions did not take place, much of the land would still restrict development by virtue of Green Belt policy, in any event.

Desirability Theme Against Designation	Representations	Natural England Commentary
	<i>This is especially pertinent in Reigate and Banstead due to the distinct halves of the Council not really being two areas that should be connected. There needs to be development protections attached to both halves of the Borough to prevent future uneven development. Designating these areas [in the north] will create additional pressure on the Southern part of the Borough and this needs to be considered carefully before allocating a new AONB. This consultation does not appear to have done that.'</i> ANON-VUXE-WSKP-D <i>'increasing the AONB boundaries in any of these areas is only likely to increase the difficulties that these LPAs [local planning authorities] have in meeting their development needs.'</i> ANON-VUXE-WSKP-D <i>'There is real concern that if the AONB boundaries are extended as proposed, the areas' development needs will only increase over time as LPAs [local planning authorities] struggle to meet the wide variety of needs of their area, without detrimentally impacting the AONB. If the government's changes to the NPPF [National Planning Policy Framework] are also implemented, as set out in the recent consultation, the impacted LPAs [local planning authorities] will not be required to amend their Green Belt boundaries as part of their plan preparation processes, further reducing their ability to meet their future development needs. These two proposals together will therefore have longlasting implications for the future planning and economic growth of the area.'</i>	In addition, many of the local authorities affected by the proposed AONB extensions are already familiar with making planning decisions within AONBs and with the need to take account of natural beauty in decision making decisions regarding housing need, etc.

Desirability Theme Against Designation	Representations	Natural England Commentary
Removal of Permitted Development Rights	ANON-VUXE-WE2Z-G <i>'If brought into the Area of Outstanding Natural Beauty, householders will be limited in the Permitted Development rights extensions they can construct which wouldn't be fair.'</i> ANON-VUXE-WSKK-8 <i>'Many farmers have buildings or barns which are no longer viable for modern agriculture and could be re-purposed for another use. Class Q and other permitted development rights often are not allowed in protected landscapes such as AONBs. The [Anon] has been made aware of many cases where this barrier to development has led to those buildings falling into extreme disrepair or even collapse meaning a loss to the character of the area.'</i>	<u>Commentary</u> Certain Permitted Development Rights (PDRs) will be withdrawn at the point a designation variation Order comes into being. Where Permitted Development Rights have been withdrawn, the standard development management process applies. The Permitted Development Rights that are withdrawn within AONBs are withdrawn in the context of the statutory AONB purpose, namely the conservation and enhancement of the natural beauty of the area. The restriction on Permitted Development Rights does not prevent approval of the types of development affected, but it does provide an opportunity for local authorities to fully consider proposals and ensure that such developments take into account the special qualities of the AONB, in line with planning policy. This adds weight to the desirability of designating the Extension Areas.
Net Zero Targets and Climate Change	ANON-VUXE-WEKF-3 <i>'When assessing the desirability of designating an area, national environmental targets should be taken into account, including those found in the Environment Improvement Plan 2023 and the Net Zero Strategy: Build Back Greener. These targets should be delivered alongside any other benefits from designation.'</i> <i>'If households and businesses in the proposed boundary extension area are prevented from moving toward net zero, the designation is not desirable. The aim should be for "win-win" situations whereby protecting natural beauty is considered alongside adapting to the climate crisis.'</i> ANON-VUXE-WSKK-8 <i>'The [Anon] believes that farms have the potential to cultivate new green jobs and deliver clean growth, with our diverse farm businesses producing not only climate-friendly and affordable</i>	<u>Commentary</u> The National Landscapes Association recognises that National Landscapes are on the front line in the response to the climate and nature crises. It advocates for the inclusion of meaningful measures around climate change mitigation, adaptation and targets to support Net Zero in National Landscape management plans. The signing of the Colchester Declaration by all National Landscapes in England reflects the commitment by all to take specific steps to achieving these goals. Natural England does not agree that designation as an AONB would prevent households and businesses from moving towards 'Net Zero'. Natural England remains of the opinion that extending the AONB boundary to encompass the proposed extensions will provide a positive impetus with regard to future land management initiatives which seek to mitigate for and adapt to climate change. What is more, the Protected Landscapes Targets and Outcomes Framework

Desirability Theme Against Designation	Representations	Natural England Commentary
	<i>food and drink, but also renewable sources of energy and fibre, while managing valuable environmental and recreational assets. The [Anon] are therefore concerned on the additional planning constraints that may affect farms looking to generate renewable energy.'</i>	includes 3 major targets related to net zero and climate change that must apply to all AONBs: - Reduce net greenhouse gas emissions in Protected Landscapes to net zero by 2050 relative to 1990 levels. - Restore approximately 130,000 hectares of peat in Protected Landscapes by 2050. - Increase tree canopy and woodland cover (combined) by 3% of total land area in Protected Landscapes by 2050 (from 2022 baseline). An important part of the new Surrey Hills AONB Management Plan is to address how these targets will be delivered across the landscape and in partnership with landowners, farmers and businesses.
Impact on the economy	ANON-VUXE-WEX6-J <i>'Narrow focus of Desirability [Assessment] report means the wider social and economic implications of the proposed boundary variations have not been fully explored or understood – this is a serious shortcoming.</i> <i>Consultation Document and evidence base fail to provide an objective assessment of the impacts of what is proposed.'</i> ANON-VUXE-WEKF-3 <i>'The beauty of the Surrey Hills AONB and surrounding areas depend on landowners actively maintaining them. Natural beauty and the environment go hand in hand with sustainable business development and growth.</i> <i>[Anon] members have already experienced limitations to economic development due to the existing Surrey Hills AONB boundaries. Extending the boundary will lead to further constraints on business development. Sustainable growth of</i>	<u>Commentary</u> From a legislative perspective the wider social and economic impacts of designation are only directly relevant to the decision whether it is desirable to designate, in so far as they relate to the conservation and enhancement of the area's natural beauty. The existing Surrey Hills AONB has initiatives which provide benefits to businesses such as Surrey Hills AONB branding of products and 'Growing the Surrey Hills Economy' is a strategic target within the Surrey Hills Management Plan. More broadly, and in relation to social and economic implications of designation, the National Planning Policy Framework does not prevent appropriate, sustainable development being granted permission. Appropriate development within AONBs can provide an opportunity to secure environmental gains as well as meeting local economic and social objectives. Furthermore, designation can provide a stimulus to some business enterprises which are notably, but not solely, in the tourism and recreation

Desirability Theme Against Designation	Representations	Natural England Commentary
	<i>local businesses must be enabled for rural areas to thrive.we believe an independent assessment should be conducted to consider the economic impacts of designation, particularly when it comes to planning permissions and growing an agricultural enterprise.'</i> <i>[Anon] members feel that these marketing opportunities [existing AONB branding of products] do not outweigh the economic disadvantages of restrictive planning policies on their businesses and ability to diversify their income.'</i> <i>'Since 2018, the tourism sector has dealt with a global pandemic that shut down many businesses, others are now wading through a cost-of-living crisis. Households will be changing spending habits, and businesses will be facing huge rises in energy costs. The change to agricultural subsidy post-Brexit means that farming businesses in England will lose a total of £1.87bn income a year from 2028. It is predicted that, on average, around 50% of this loss will be recouped from environmental schemes. However, the other 50%, ~£935m, needs to be made up through diversification opportunities such as tourism - an important sector in the Surrey Hills. Any further changes to the Surrey Hills must not impact sustainable growth of tourism, particularly for agricultural businesses who need to diversify.'</i>	sectors, as considered further below.
Impact on viability of businesses	ANON-VUXE-WEKF-3 <i>'The Surrey Hills Management Plan should not handle rural businesses as an afterthought – they must be a priority.'</i> <i>'Business viability requires a viable flow of funds, from diversified farming businesses, to be able to afford to maintain and enhance the landscape and biodiversity. If this was not to</i>	<u>Commentary</u> The concern expressed in this response with regard to the impact of designation on business is the perception that there are burdens or drawbacks arising from AONB designation. Local planning authorities do not have powers to direct activity, nor specifically to restrict use of land or certain business in AONBs. They cannot,

Desirability Theme Against Designation	Representations	Natural England Commentary
	<i>continue, then the nature conservation and reasons for creating the designation in the first instance are jeopardised. We need to nurture businesses that look after the land and therefore the environment.'</i> <i>'The economic viability of those farming in AONBs is often very tight and alternative sources of income are essential to maintain the business. This viability is often undermined as planning policy is rigid and strict about what will/[will] not be granted planning permission, and is not conducive to flexible and adaptable development, let alone the delivery of a broader-based economy with high-value industries creating higher wage opportunities.'</i> ANON-VUXE-WSRA-5 <i>'The buildings on my constituent's farm are in a dilapidated state due to age and require investment for the farm to remain operational. He had plans to invest in the Farm, starting with the new grain store, but this has proved difficult due to planning regulations. An expansion of the AONB to include his land would only make it even more challenging to carry out this necessary work. This is exemplified by friends of his from the Country Land and Business Association who he says have been crippled by their land being within national parks.'</i> <i>The proposed extension to the Surrey Hills AONB would greatly impact [Anon's] ability to make the necessary repair works and improvements to his farm to ensure it remains viable and operational, thereby also having a major impact on his ability to sustain rural jobs.'</i>	for example, compel a particular type of business activity or land use. There should therefore be no reason for any landowner or business to change their current land use, management or other business activity as a consequence of designation. However, the purpose of designating land as an AONB is to protect and enhance the natural beauty of that landscape and therefore any development or land management changes that might impact this will require the relevant local planning authority to have regard to the purpose for which AONBs are designated when determining development proposals. With regard to Permitted Development Rights (PDRs), as described in previous themes, certain PDRs will be withdrawn at the point a designation variation Order comes into being. Where Permitted Development Rights have been withdrawn, the standard development management process applies. The Permitted Development Rights that are withdrawn within AONBs are withdrawn in the context of the statutory AONB purpose, namely the conservation and enhancement of the natural beauty of the area. The restriction on Permitted Development Rights does not prevent approval of the types of development affected, but it does provide an opportunity for local authorities to fully consider proposals and ensure that such developments take into account the special qualities of the AONB, in line with planning policy. This adds weight to the desirability of designating the Extension Areas. The concerns expressed by this respondent on behalf of its constituent relate to the planning system and these are addressed in response to comments with regard to the planning elsewhere in this Table. A further consideration is the positive impact that spending within an AONB can have on the local economy. As with all such spending, this has a positive multiplier effect on the local economy. Although the prime function of public sector spending within an AONB is to deliver its statutory purpose,

Desirability Theme Against Designation	Representations	Natural England Commentary
		an indirect and important consequence is to provide a financial benefit for local businesses and communities, for example by employing local contractors. AONBs also attract other external grants and income which benefit local businesses and communities. Natural England does not agree that AONB designation threatens the long term viability of businesses or adversely affects employment opportunities in these rural areas. On the contrary, designation can provide a stimulus to some business enterprises which are notably, but not solely, in the tourism and recreation sectors, as considered further below.
Increased public access and visitor numbers	ANON-VUXE-WSKK-8 <i>'Due to close proximity to London and heavily populated urban areas nearby we have concerns that visitor numbers on livestock heavy farm land could lead to an increase in livestock worrying. Data from the NFU Mutual indicates that the average insurance claim for an attack is over £1,300 with the total cost to the sector of £1.3m in 2021 – a rise of over 10% on 2019. Research suggests that 64% of dog owners let their dog off the lead in the countryside while half admit their pet doesn't always come back when called.</i> <i>Furthermore, the agricultural industry is a working environment involving large machinery and needs to balance the rights of the public to access the networks of footpaths, bridleways and byways across farms with safety. The sector represents just under 2% of the workforce in Great Britain but accounts for around 19% of the reported fatal injuries each year. Over the past 20 years, there has been 100 deaths caused by livestock and one fifth of those were members of the public - on average one person killed every year, with many more injured. The safety of both the public and those working in the agricultural industry continues to be a high priority and we are</i>	<u>Commentary</u> The inclusion of additional land within the AONB would not in itself bring about any change in existing access arrangements. On the contrary, the AONB Partnership can provide support to landowners to mitigate any conflicts between access and land management. Within an AONB the management of Public Rights of Way remain the responsibility of the responsible authority and designation would not result in any change to this responsibility. There are several examples where the Surrey Hills AONB has developed projects that attempt to manage increased footfall and visitor numbers. One notable project, the Yew tree project was developed in response to problems from increased footfall and using the Surrey Hills Access For All Fund implemented new strategies to encourage people to use designated footpaths, bridleways and board walks. The Surrey Hills AONB Management Plan also places focus and aims to address the concerns highlighted by the respondents on the issue of increased public access. The development of the management plan is also a collaborative process and therefore all stakeholders and communities that fall

Desirability Theme Against Designation	Representations	Natural England Commentary
	<i>concerned that a potential increase in visitor numbers will add an unnecessary risk to the working environment.</i> <i>Rural areas are characterised by roads that are often narrow, single track and difficult to pass and issues included roads being blocked to emergency vehicles, gateways and lane entrances being barricaded, blocked farm vehicles in fields or prohibiting field access. We do therefore have concerns over a potential increase in visitor numbers leading to a number of risks for our already stretched rural network of roads. Indeed in 2022 Surrey County Council announced plans to reduce the speed limit on some rural roads from 60mph to as low as 20mph after identifying the risk associated with the current local rural road infrastructure.</i> <i>In addition to this, a particular worry to NFU members relates to transportation of livestock to and from farms, markets, and abattoirs. When animal hauliers experience undue delays, this has important welfare implications and therefore increased traffic on rural roads is of concern.'</i>	into the AONB or are associated to its designation are given the opportunity to voice their priorities and concerns for the future of the landscape.
Increase in house prices	ANON-VUXE-W5T8-Z <i>'Any extensions to the AONB will greatly increase house prices within and around the AONB. House prices are already far too high and in short supply.'</i> ANON-VUXE-WEW3-E Housing delivery will likely become more expensive which can result in higher house prices and changes to the quality, size, design and affordability of homes including the delivery of First Homes. ANON-VUXE-WE2Z-G	<u>Commentary</u> Natural England Guidance (para 8.20) addresses issues relating to house prices. It states that '<i>designation may have impacts beyond the statutory purposes but which are not relevant to the consideration of the desirability of designation in the statute. Common issues raised include democratic representation, impacts on housing markets, local economies or agriculture and the name of a designation. Natural England, in designating, must bear in mind however that Parliament has put in place the basic framework of National Parks and AONBs which addresses some of these issues. In addition, Government policy influences how National Parks and AONBs operate in relation to wider policy areas, such as housing, the economy and</i>

Desirability Theme Against Designation	Representations	Natural England Commentary
	<i>'Surrey is a popular place to live due to the attractive countryside and proximity to London. There does, however need to be some managed development to reduce house prices and increase jobs. Further expansion is not necessary.'</i>	<i>planning. Any matters such as these are beyond those relevant to the consideration of the desirability of designation, but may rightly form the basis of Natural England's separate advice to Government on general matters relating to designated landscapes policy.'</i>