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Part B

Question B1: Dunsfold Low Weald - tick YES

Part C - Dunsfold Low Weald

Question C1: sufficient natural beauty? tick YES

Please give a reason for your views.

Dunsfold Parish Council (the "Council") notes that the proposed revised AONB boundary includes most of the north and west of Dunsfold Parish, but excludes more southerly and eastern areas containing large tracts of ancient woodland/SSSI, listed buildings, pristine wildflower meadows and the Wey & Arun Canal (including Sidney Wood).

Although the Council is therefore disappointed that the proposed boundary is not more extensive in its scope within Evaluation Area 13, and subject to its observations elsewhere in this response, the Council generally agrees with the conclusions of the Natural Beauty Assessment Final Report (February 2023) (the "NB Report") in respect of Evaluation Area 13.

In particular, the Council notes the NB Report's "strong weight of evidence for natural beauty" within the area, including (but not limited to) its varied topography and "rich natural and cultural heritage". This is consistent with the area's existing designation as an Area of Great Landscape Value and also the conclusions of the Hankinson Duckett Associates Report (October 2013). The Council also notes the volume and quality of public responses to the call for evidence in relation to the Parish, and which has resulted several submitted photos being used in the consultation documents themselves.

Question C2: other important information to include in natural beauty assessment? Tick NO

Question C3: is it desirable to designate? Tick YES

Please give a reason for your views.

Although the Council is disappointed that the area proposed for inclusion in the revised AONB boundary is not more extensive (being as it only covers a portion of Dunsfold Parish), the Council nonetheless generally agrees with the conclusions of the Desirability Assessment Final Report (February 2023) (the "D Report") in respect of the Candidate Area within Evaluation Area 13.

In particular, the Council notes the D Report's concerns relating to the erosion of rural lanes, addition of close board fencing/gated accesses, and coniferous plantations, together with the area's vulnerability to loss of tranquillity arising from nearby activity and consented development. It is clear to the Council 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 Paragraph 176.

The Council is pleased to see that AONB designation is expected to bring additional funding, stewardship and permitted development rights restrictions to tackle the issues highlighted.

Question C4: any other important information that we should include in assessing desirability? Tick **NO** 

Question C5: Do you agree with the proposed boundary of this extension? Tick I WISH TO SUGGEST AN ALTERNATIVE BOUNDARY

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Please give a reason for your views.

The Council appreciates the extensive and diligent work carried out by Natural England and its advisers to identify a suitable revised boundary within Evaluation Area 13 Dunsfold Low Weald. Although the Council remains disappointed that more of the Parish has not been included, it warmly welcomes the proposal to expand the AONB to cover a substantial portion of Dunsfold Parish.

Without wishing to detract from the Council's positive and supportive sentiment towards the areas of the Parish already included in the proposed revised boundary, there are a couple of discrete areas where the Council is concerned that the Candidate Area and the proposed revised boundary may have been drawn too conservatively. Details are provided below and in the attached map (coloured green).

## Northeastern Boundary - Pratts Corner

- Between TQ 01280 37640 and TQ 01812 37876 on the south side of the Dunsfold Road, the verge/common land has been thinned, opening views south to the undulating landscape towards High Loxley. This area is in close proximity to Hascombe Hill, and therefore enjoys close visual association with the greensand Surrey Hills.
- The size of the field on the south side of the Dunsfold Road between Pratts Corner and Thatched House Farm is not inconsistent with the size of the fields within the existing AONB, including those on the north side of the Dunsfold Road, and it contains a number of mature deciduous trees together with the woodland at "The Burchetts" (see below).
- The coniferous plantation at "The Burchetts" (TQ 01756 37417) has been felled, leaving the ancient (deciduous) woodland remaining. As a result, Bridleway 280 to the south of Dunsfold Road enjoys direct views north through the woodland towards the Greensand hills, an important visual association which is emphasised throughout the consultation document and accompanying reports.
- As a result of the boundary tracking High Loxley Road, the proposed extension excludes the
  historic listed farm complexes at High Billinghurst Farm (Grade II, listed 1987) and Thatched
  House Farm (3x Grade II buildings, listed 1986) (also singled out in the NB Report), together
  with the surrounding undulating pastoral landscape and woodlands. It is not clear why these
  areas have been excluded.
- Given that Sayers Land has been mentioned in the NB Report as one of the pockets of ancient woodland forming the Chiddingfold Forest SSSI, it is not clear why it has been considered necessary to exclude this in its entirety. The Council notes that Sayers Land is also managed in parts through traditional coppicing methods and includes a ghyll stream all of which are features highlighted in the consultation documents. The Council notes that the land between Sayers Land and New Pound Farm (not New Pond Farm) might still be excluded by the boundary following the southwestern edge of Sayers Land in order to address concerns raised about detracting features.
- The Council notes the reference to the recent permission for hydrocarbon exploration east of High Loxley Lane, and agrees that this deserves consideration. However, the Council wishes to draw Natural England's attention to the following:
  - o The application is situated on land northwest of the aerodrome. The narrative NB Report appears to recommend this area of land for inclusion within the Candidate Area: "....extending east as far as Dunsfold Aerodrome". However, it is not clear why the site is then referred to under the following sub-section as "beyond the qualifying area of land in terms of natural beauty" and is then placed outside of the resulting Candidate Area (Fig 11.13). The hydrocarbon permission is again considered at the

- boundary setting stage, although that appears to be directed towards the specific impact from the creation of an access on High Loxley Road, as opposed to the main hydrocarbon exploration site itself. As a result, it is unclear at what stage in the assessment process the existence of the temporary planning consent has resulted in the whole site being discounted from inclusion.
- The Council understands that the grant of planning permission is currently subject to a legal challenge by Protect Dunsfold Limited and Waverley Borough Council, the full hearing for which is due to take place on 8 June 2023;
- The planning consent (subject of the legal challenge above) is for a temporary duration of 3 years, with reinstatement of the land thereafter (subject to the next bullet point). The Council notes that, per the Natural England Guidance for Assessing Landscapes revised in June 2021 (Appendix 4), incongruous features should be excluded unless of a temporary or transient nature); and
- The extent of the proposed permanent road widening at the junction of High Loxley Road and Dunsfold Road at Pratts Corner is limited in size to a maximum of 90cm either side of the existing carriageway, which is now clearly marked with wooden posts. The remaining extensive grass verge/common areas around the junction are unaffected by the application.
- Acknowledging the review's desire to use visible physical features over administrative boundaries, the Council respectfully submits that the proposed boundary may be drawn initially slightly beyond the Dunsfold Parish administrative boundary to track existing field boundaries in the vicinity of Thatched House Farm before continuing along existing field boundaries and incorporating both High Billinghurst Farm and Sayers Land.

## Southern Boundary – Chiddingfold Road and Plaistow Road

- The Council notes that the proposed boundary adopts a particularly complicated course at this
  location, excluding the area around Blacknest Farm north of the Chiddingfold Road. As a result,
  the proposed boundary does not follow the Chiddingfold Road at Loxley Bridge as might
  logically be expected but tracks north and west to join the Chiddingfold Road northwest of
  Wetwood.
- The boundary therefore notably stops just short of the historically significant properties of Wintershall (Grade II, listed 1987) and Blacknest Cottage (Grade II, listed 1960), displaying particularly strong vernacular and built heritage, together with a number of other traditional farm cottages and associated buildings. It also excludes a small section of Bridleway 286 and cuts through the southern section of Standing Wood. By following a watercourse, it is not clear to what extent the watercourse itself would therefore be included in the designation. The Council notes that watercourses are a particular natural heritage feature of the Dunsfold Low Weald landscape highlighted in the consultation documents.
- Acknowledging the concerns about ad hoc linear and commercial development along the Chiddingfold Road, the Council respectfully suggests that Natural England might consider continuing the boundary from Loxley Bridge along the north side of the Chiddingfold Road to include the above listed buildings and respective settings, allowing this to capture the additional pockets of ancient woodland and the watercourse itself, before turning north to follow the southern edge of Standing Wood.
- The Council notes that there has been no material new development along the Chiddingfold Road in recent times at this particular location close to Loxley Bridge affecting the view, and

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- therefore the concerns about detracting linear development along lanes would appear to refer to development elsewhere.
- The Council is also concerned that the proposed boundary excludes several historic buildings along the northernmost section of the Plaistow Road at the junction with the Chiddingfold Road which, although not listed, nonetheless display strong local vernacular (pantile roofs, red brick, timber framing and tile hanging), and are nestled in their natural surroundings comprising of wildflower meadows and mature (in some cases, ancient) tree specimens, bordered by the naturalised road junction at Chiddingfold Road/Plaistow Road and a public footpath (FP 286). If Natural England is minded to consider revising the proposed boundary at this location, the Council would be grateful if this additional segment could be included in that consideration.

Please refer to the enclosed map.

## Additional note

Although the Council makes the above comments regarding two discrete areas of the proposed boundary, the Council wishes to note that it would be generally supportive to the proposed boundary being extended even further to include the <u>whole</u> of Dunsfold Parish, in the event that Natural England is minded to revisit its conclusions more widely on the basis of other consultation responses.