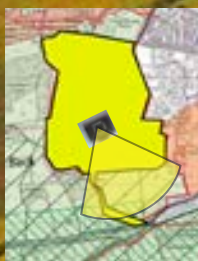


Consultation Response

Surrey Hills AONB Boundary Review

November 2021



Compton Parish Council



Note

All photos in this paper show areas of Blackwell Farm currently outside Natural England's draft "possible areas of search".

The approximate area omitted from the area of search is highlighted on the thumbnail map in yellow.

The camera icon shows the position and direction that each photograph was taken.



e.g. camera pointing NW



Introduction

Compton Parish Council welcomes Natural England's review of the Surrey Hills Area of Outstanding Natural Beauty (AONB) boundary and welcomes the inclusion of additional parts of the Parish, which aren't currently designated as AONB, as possible evaluation areas.

The opportunity to designate land as worthy of special status (and protection) is rare. It is therefore extremely important that land in and around our Parish, which is of a high landscape value and which has already been assessed as worthy of inclusion in the revised AONB boundary, should be considered as part of the forthcoming review.

However, we are concerned that there may be pressure from the local authorities, the Local Enterprise Partnership, and developers to exclude particular areas from the study, and this might influence the extent of the review being undertaken by Natural England. Concern is particularly raised as study areas indicated in Figure One, dated August 2021, are described as "possible" rather than definite areas. We are also con-

cerned about the vague boundary to the study area on the west side of Guildford (highlighted in Figures Two and Three), where the precise boundary of the study area is open to interpretation and could be subject to 'pressures' to exclude the area from the AONB review.

We are also concerned that strictly following Natural England's own guidance in executing the review introduces inconsistencies and undesirable results, which might serve to undermine the review process. We therefore highlight these issues and touch on the wider opportunities that Natural England has in undertaking the review, using "actual words of the relevant statutory provisions" to produce more desirable results for future generations.

In this document we describe the reasons why we believe that land north of the Hog's Back should be included in this review, and we then discuss specific inconsistencies that would be introduced if part of this land was excluded from the study.

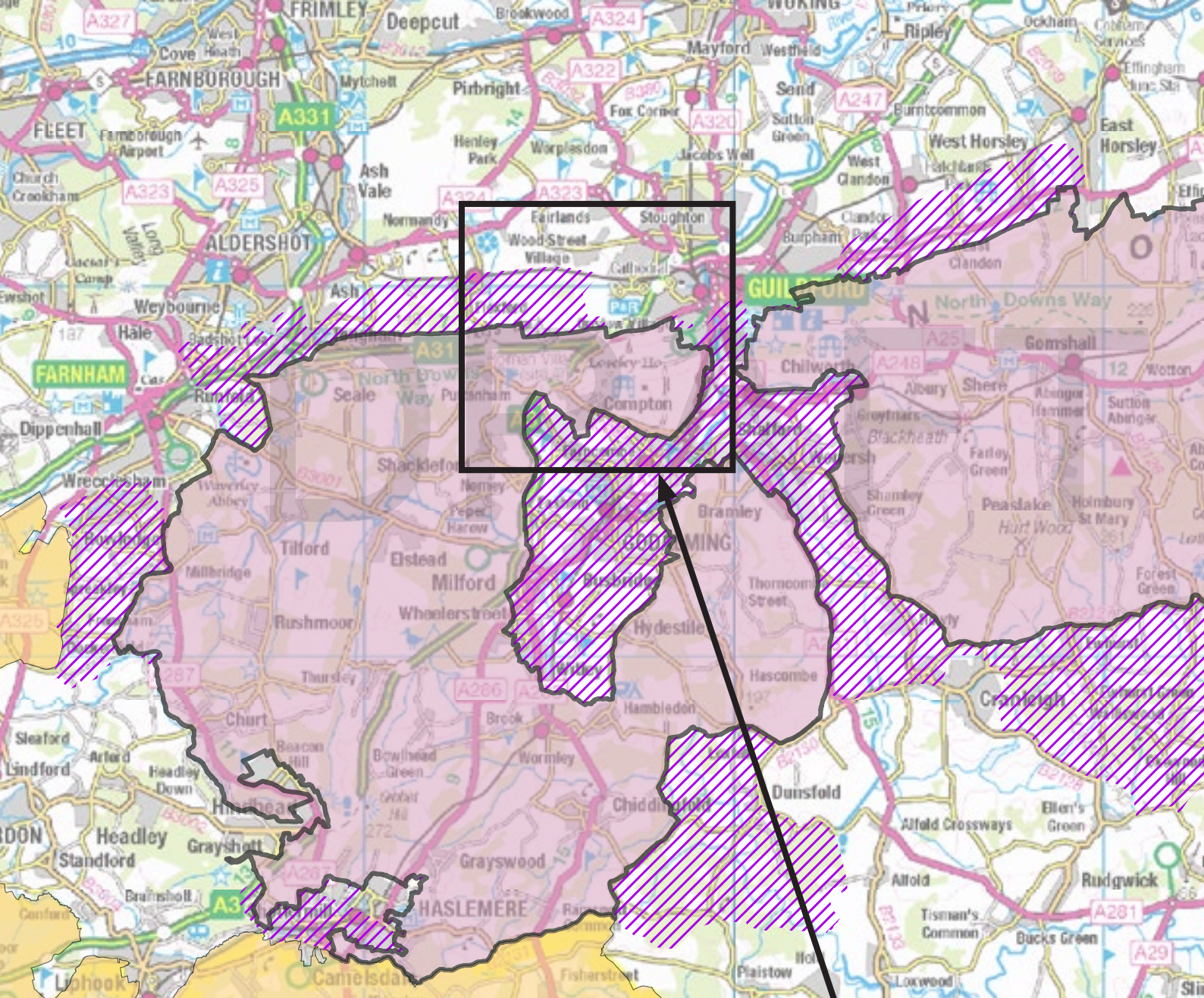


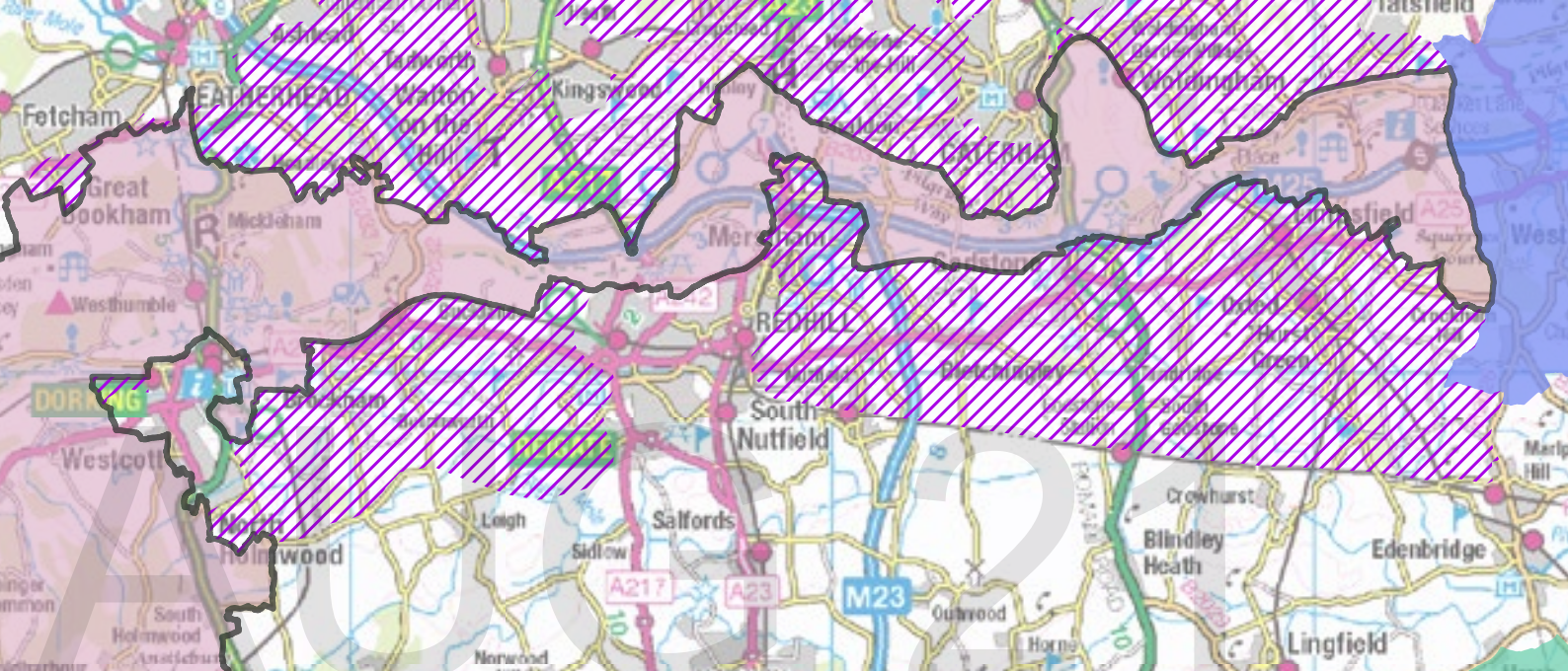
Figure One – Natural England’s Possible Area of Search as at August 2021 (Draft).



Figure Two – Detailed view of evaluation area originally proposed by Alison Farmer Associates on the western edge of Guildford (March 2012) includes the area between the Hog’s Back ridge and the railway line (see Figure Five for full map).

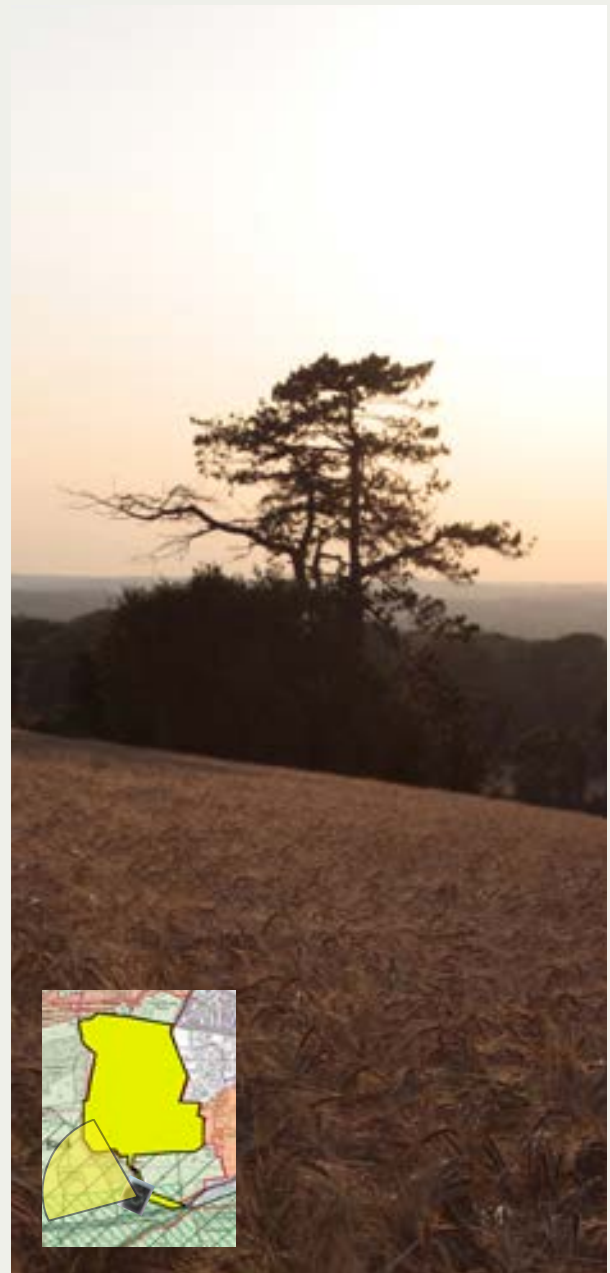


Figure Three – an area on the west of Guildford appears to have been removed from the search area in August 2021. This corresponds to land owned by the University of Surrey at Blackwell Farm.



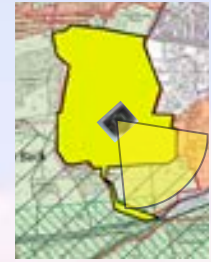
Compton Parish Council recommends/proposes that the original search area (indicated in Figure Two) should be included in the AONB review, and Natural England redraws the draft map dated August 2021 to include this land (north of the Hog's Back – bounded by the railway line to the north and the ancient woodland at Dean Bottom and the line of trees heading from the woodland up the slope towards the ridge to the east).

We do not comment on the merits or otherwise of areas already included as possible areas of search as we hope that an objective assessment of natural beauty will result in the revision of the AONB boundary to include land based on merit alone.



The landscape shown on this page was excluded from Natural England's Area of Search before the AONB boundary review started.





Our concerns over the planned AONB boundary review process

Discussions with the Planning Advisor to the AONB Board, with councillors from GBC and with members of the AONB Board suggest that particular areas will be excluded from the boundary review as a result of recent land designations for development within Guildford's local plan. The rationale being argued by these parties was that the AONB review should not be used to protect land from development as described in Natural England's *Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England, Appendix 4 Boundary Setting Considerations*, which states:

“Land allocated for development: Land on the margins of a National Park/AONB identified in development plans (both adopted and emerging), or having the benefit of planning permission, for major built developments (including the extraction of minerals and other deposits) should normally be excluded from the Park/AONB, unless the land will be developed or restored to a land use and quality which contributes to Park/AONB purposes. Land should not be included merely to seek to protect it from specific development proposals.”

However, the introduction to this Guidance also suggests that Natural England is given some room for manoeuvre and can tailor its review accordingly:

“It is not intended to be complete or exhaustive guidance and it will be possible to depart from

this guidance where the circumstances demand it. Above all, it is the actual words of the relevant statutory provisions which need to be applied in decision-making on designations.”

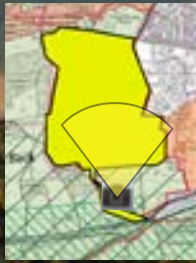
What is relevant here is the *Countryside and Rights of Way Act 2000, Part IV Areas of Outstanding Natural Beauty, Section 82 Designation of areas*, which states:

“(1) Where it appears to Natural England that an area which is in England but not in a National Park is of such outstanding natural beauty that it is desirable that the provisions of this Part relating to areas designated under this section should apply to it, Natural England may, for the purpose of conserving and enhancing the natural beauty of the area, by order designate the area for the purposes of this Part as an area of outstanding natural beauty.”

AONB status was not established to prevent any form of development taking place and we believe that neither should any planned development prevent land being designated as AONB. However, this designation would ensure that any development is appropriate in scale, design and setting at the planning stage, thus minimising adverse impact to the wider area as well as to the setting of the existing AONB.

Compton PC would also like to draw your attention to the article attached (**Annex A**), which demonstrates Natural England's willingness to designate an area in Swanscombe, Kent, as an SSSI despite plans for development, thus demonstrating a desire to judge areas on merit alone, a decision we would wish to see repeated on the Hog's Back.

Hills and views: photograph from the
ACME on the Hog's Back in Blackwell
Farm looking north



“From this town of
Guilford [sic], the
road to Farnham
is very remark-
able, for it runs
along west from
Guilford, upon the

ridge of a high chalky hill... from
this hill is a prospect either way,
so far that 'tis surprising; and one
sees to the north, or north west
over the great black desert, called
Bagshot-Heath, mentioned above,
one way, and the other way south
east into Sussex, almost to the South
Downs, and west to an unbounded
length, the horizon only restraining
the eyes ...” (Daniel Defoe, 1724-27)



“Upon the whole
it was an excellent
journey and very
thoroughly enjoyed
by me; the weather
was delightful the
greatest part of the

day ... I never saw the country from
the Hog'sback so advantageously.”
(Jane Austen, May 20, 1813)



“All the world in a few
square miles. Chalk
pits and blue butterflies
on the Hog's Back. And
at the foot of the hill,
suddenly, the sand;
hard, yellow sand with
those queer caves ...

And the fine grey sand on which
the heather of Puttenham Common
grows ... And the enormous sloping
meadows round Compton and the
thick dark woods. And the lakes,
and the heaths, the Scotch firs at
Cutt Mill. The forests at Shack-
leford. There was everything. Do you
remember how we enjoyed it all?”
(Aldous Huxley, Antic Hay, 1923)



Land north of the Hog's Back should be assessed as part of the review

The reasons why Compton PC believes that this land should be included in the review are as follows:

1. This area forms some of the most dramatic and beautiful long-ranging views from the Hog's Back to the north, and from the north into the Hog's Back. The views from the Hog's Back have been admired and treasured for generations and written about by authors such as Daniel Defoe, Jane Austen and Aldous Huxley.
2. The views from the Hog's Back towards the north and towards the south have been considered integral to the Surrey Hills AONB since its inception in 1958. This is confirmed in a history of the Surrey Hills AONB published by the Surrey Hills Society to celebrate the AONB's 60th anniversary, which states:

"In 1934, a book was published titled The Surrey Landscape and dedicated to CPRE. Included within it was a map of the county which delineated special
3. Ken Bare's book specifically references views from the Hog's Back to the north and from the north into the Hog's Back. In describing the problem facing those deciding where the original AONB boundary should be drawn, he writes:

"the views to the north across the Thames Valley were just as special as those from the same point looking south and the view from the north towards the Hogs Back was also important." [The Surrey Hills – Our Changing Landscape, page 7]

areas – particularly within the North-downs and Greensand Hills. It is evident from the similarity of the areas marked on this early map and the boundaries subsequently agreed for AONB that there was already strong agreement about the core areas which needed to be included.

This map even identifies what it calls "fine viewpoints", including those from the Hog's Back, above the Tillingbourne Valley, Box Hill, Reigate Hill and above Titsey. All of these are still recognised as inspiring views and treasured as features of the AONB." [The Surrey Hills – Our Changing Landscape, Ken Bare, page 6]



Figure Four - Hills and Views - "fine view points" still regarded as important from *The Surrey Hills – Our Changing Landscape* by Ken Bare.

“This landscape is therefore considered integral to the AONB and critical to the conservation of rural views to the north of equal if not greater importance to land to the west of Down Place”

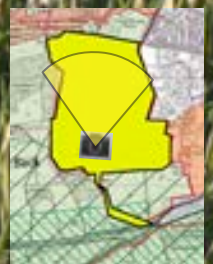
A body of evidence demonstrates that the area north of the Hog’s Back meets the natural beauty criterion. For example:

i) in 2016, independent landscape architect Land Management Services (LMS) carried out a landscape beauty evaluation of this area on behalf of three parish councils (Compton, Worplesdon and Wanborough) and concluded that most of it met the criteria for AONB status. Furthermore, the evaluation confirmed that this landscape was “integral to the AONB” and “critical to the conservation of rural views to the north”. The LMS study states that:

“land to the south and east of Wildfield Copse, in the vicinity of Down Place and Blackwell Farm (sub character areas 3 and 4), is of a landscape and scenic quality, character and condition which should merit inclusion within a revised AONB boundary. The landscape represents many of the defining characteristics of landscapes within the Surrey Hills AONB. These two sub character areas

*include land on the upper slopes of the Hog’s Back ridge which is representative of classic chalk downland and areas on the lower slopes typical of former parkland estates, with field patterns and mature trees and large blocks of ancient woodland providing strong evidence of the landscape and cultural heritage of the local area. **This landscape is therefore considered integral to the AONB and critical to the conservation of rural views to the north of equal if not greater importance to land to the west of Down Place included in Area 12-1** [Hogs Back Natural Beauty evaluation – Land to the east of Flexford in the vicinity of Blackwell Farm, Down Place and Homestead Farm, May 2016].*

This evaluation by LMS was passed to Natural England by former Guildford MP Anne Milton in 2016. A copy of this assessment is also attached to this document (see **Annex B**).



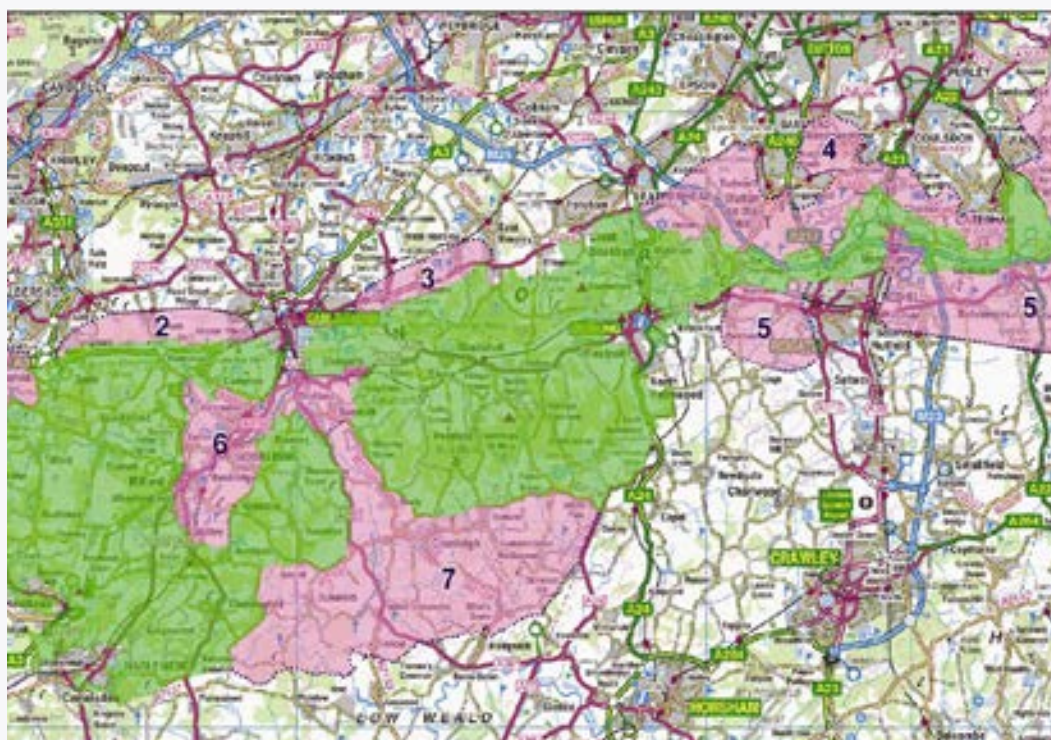
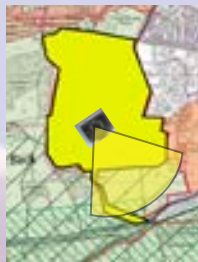

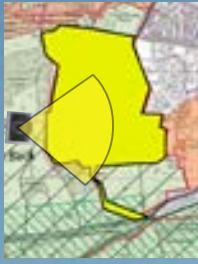


Figure Five – Recommended evaluation Area for Surrey Hills AONB, Alison Farmer associates, March 2012.



ii) **The area was recommended for inclusion in the search area for the revised AONB boundary in the 2012 landscape review commissioned by Surrey County Council.** This review carried out by Alison Farmer Associates was based on studies over 13 years between 1997 and 2010 and used up-to-date criteria, based on boundary reviews of the New Forest and South Downs National Parks. The review recommended that the “northern fringes to the AONB between Aldershot and Guildford” should be among the areas to be assessed for AONB status. [Alison Farmer Report to Natural England – Surrey Hills Review Table 2.1.] The map (see left) indicating the proposed area of search from the Alison Farmer Associates review clearly shows land between the railway and the Hog’s Back ridge was considered as worthy of inclusion in the AONB boundary review.

iii) **Part of the land at Blackwell Farm is AONB and other areas are designated AGLV.** Surrey Hills AONB Designation History Series, para 4, states: “there was clearly an expectation in the County that the existence of AHLV [Areas of High Landscape Value - in 1955 ‘High’ was replaced with ‘Great’] would facilitate the eventual designation of these areas to AONB by the NPC [National Parks Commission.]”



iv) **Historically, Guildford Council has pressed to have more of the northern side of the Hog's Back included in the AONB.** At the time of the Surrey Hills AONB's initial designation, Guildford Rural District Council (the predecessor to Guildford Borough Council) sought to have more of the northern flank of the Hog's Back included in the AONB boundary. The Designation History Series for Surrey Hills AONB states that:

"Guildford Rural District Council also repeated their previous requests for considerable additions of land to the north of the Hogs Back and the chalk ridge generally." (para 9).

An appendix to the designation series makes it clear that this land included much of the area that Compton PC would like to see included in the revised AONB boundary:

"Guildford Rural District ask for rather sweeping additions: i) a strip of about one mile broad north of the Hog's Back from the ugly Village of Tongham to the Guildford borough boundary..." (Folio 6)



v) In addition to two belts of ancient woodland, the area includes Chalk Pit Wood – an old chalk quarry dating back to the 1930s, which is of geological interest. A representative from Natural England visited the quarry with a former parish councillor in 2014 and stated that it could merit SSSI status for its geological interest, were it not for the fact that a similar quarry with the SSSI designation existed nearby on the southern flank of the Hog's Back at Seale. The Surrey Wildlife Trust describes the Seale chalkpit as a “hidden gem on the Hogs Back containing fascinating geology

and rare chalk flowers”. It further states:

“The chalk formed in the Upper Cretaceous era some 65-80 million years ago and marks the boundary between the London Basin to the north and the Wealden anticline (where the rocks buckled up into a wide shallow dome) to the south; this is one of the few places in the area where this important feature can be examined.” [<https://www.surreywildlifetrust.org/nature-reserves/seale-chalk-pit-meadow>]





vi) The area contains remnants of 18th century parkland at Down Place, which is believed to have been designed by Capability Brown. Capability Brown designed several parks at nearby estates, such as Peper Harow House and Clendon Park. Whilst only anecdotal evidence exists to link Down Place and Capability Brown, the tree groupings and vistas are certainly in the Capability Brown style.



Landscape assessment, pressures to omit Blackwell Farm and inconsistencies introduced as a result

The Landscape Beauty Evaluation commissioned by Surrey County Council in 2013 (and carried out by Hankinson and Duckett Associates), which assessed the northern fringes of the AONB between Aldershot and Guildford), did not include the area around Blackwell Farm as a “Recommended Additional Area within Surrey Hills AONB”. However, it is important to note that a FOI request revealed that the study did not fully evaluate this area despite this land being included in the evaluation area identified by Alison Farmer Associates just a year earlier and despite a portion of it including AGLV. Blackwell Farm had also not been publicly presented as a potential development area at the time.

The Hankinson and Duckett evaluation states that as part of its methodology: *“Initial field survey points for each of the character areas within the study area were identified, and an evaluation carried out at each location using standard survey and evaluation sheets.”* No standard survey and evaluation sheets were filled in for the land around Blackwell Farm that was planned to be developed by the University. A rigorous assessment of this land might have shown it did not meet criteria. However, the independent analysis by Land Management Services commissioned by Compton, Worplesdon and Wanborough Parish Councils showed that it did, and as this is the only full analysis of this land then it should be included in the current AONB boundary study by Natural England. The LMS evaluation is the only assessment that has been carried out according to the principles set out in the Countryside Agency’s updated landscape assessment guidance, published in 2002.

Neighbouring Parish Councils have been recently told by representatives on the AONB Board that “there is no way that Blackwell Farm will be included in the AONB review”, and have been dissuaded from arguing the case for this area to be included. However, strictly following Natural England’s guidance to exclude this area gives rise to inconsisten-

cies and perverse decisions. Consider the village of Farncombe, as an example, which is already developed and where there are applications for further development. This area is indicated as being included within the review. However, there would appear to be a decision made a long time ago to exclude Blackwell Farm (which has been independently assessed as meeting the criteria for AONB) from the study area. Photographs of these two areas are shown in Figures Six and Seven below. The difference between these areas is that Farncombe is already heavily developed and Blackwell Farm isn’t.

Furthermore, if Blackwell Farm is not included in the revised boundary, then other potential AONB candidate areas which overlook it (Chalk Pit Farm, Wanborough and Flexford further west along the ridge and the commons in Wood Street Village to the north) may also be blighted by inappropriate development on this site.

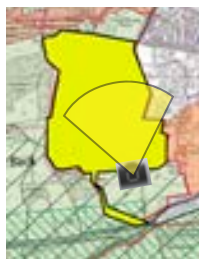
Finally, the decision to omit Blackwell Farm from inclusion in the “Recommended Additional Areas of Surrey Hills AONB” has resulted in a boundary proposed by Hankinson and Duckett that was indefensible and inconsistent with Natural England’s guidance as described in the section below.



Figure Six - Farncombe is included in the AONB review.



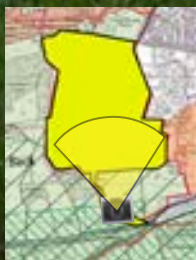
Figure Seven - Land on the West of Guildford at Blackwell Farm is not included in the review despite part of the area designated AGLV and directly neighbouring AONB.



View looking north across Blackwell from the Area of Outstanding Natural Beauty. The ancient woodland on the right of the image (Strawberry Grove, Dean Bottom and Manor Copse) forms a strong and defensible AONB boundary. This coincides with the historic boundary of Guildford's Royal Park, where banks and deer leaps dating back to Henry II are still evident

Railway

Pink's Hill and Broad Street Common



Boundary considerations

There is a strong argument that the AONB on its northern boundary should extend beyond the railway line to include Broadstreet Common (a Site of Nature Conservation Importance) up to Oak Hill and Broad Street, which as a road forms a defensible boundary. Alison Farmer Associates evaluation area suggested that the railway line itself might form a defensible boundary in its 2012 study.

Strawberry Grove



Dean Bottom



Manor Copse



Remains of Henry II's Royal Hunting Lodge (SAM) are found on the eastern edge of Blackwell Farm where it meets Manor Farm at Manor Copse. Manor Farm was previously designated AGLV, but has since been subject to development by the University of Surrey.

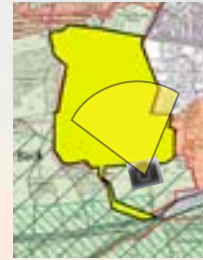


Records show that King John spent Christmas at Manor Farm with “uncommon splendour and magnificence” in 1200; Edward III spent Christmas there in 1337, 1340 and 1347; Edward IV stayed in 1479 and 1482; and Henry VIII in 1546. It is also believed that Elizabeth I visited on several occasions.

The proposed AONB boundary by Surrey CC follows the approximate dotted line below and is not defensible.

Furthermore, none of the land beyond the dotted line is included within Natural England's review of the AONB, despite some of this land already being designated as AGLV and despite an independent study concluding that large parts of Blackwell Farm meet AONB criteria.





Boundary proposed by Surrey CC study is indefensible and counter to NE Guidelines

Surrey CC commissioned a study in 2014 to explore areas to be included within the AONB. This study did not undertake a full assessment of all the land at Blackwell Farm and results in an indefensible boundary just short of what was the proposed development area. The northern boundary suggested by the Surrey CC study follows a rather arbitrary line, which passes through the middle of a field at Blackwell Farm (as indicated by the dotted line) and then follows a two-foot rabbit fence at the bottom of a private garden at Down Place (see overleaf). It also cuts through the middle of an Area of Great Landscape Value. Compton Parish Council proposes that NE adopts an alternative AONB boundary that is robust and follows identifiable features on the ground. This should be either the Oak Hill / Broad Street roads or the railway line to the north. The wide belt of ancient woodland and an established tall treeline should form the boundary to the east (following the historic deer leap of the Guildford Royal Park). This is described later on.

If Natural England does not include the whole of the northern flank of the Hog's Back to the railway in the search area, then an alternative appropriate boundary would be the Farm Road, which at Down Place is bounded by a high wall forming a Victorian walled garden, which would screen proposed development to the north). This proposal would be more robust than the AONB boundary proposed by Hankinson and Duckett's study for Surrey CC.

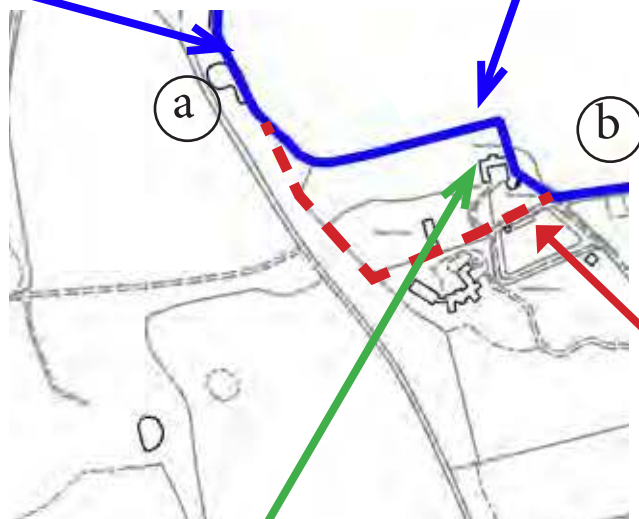
The Northern boundary of the AONB proposed by the Surrey CC study is formed by a low, wire rabbit fence and barely visible and not defensible in this location. If NE decide not to include Blackwell Farm within the AONB (by shifting this boundary to the railway line or further north to include Broadstreet Common), then this proposed boundary should be modified at Down Place as indicated by the red dotted line to create a more defensible boundary.

The rabbit fence can't be seen clearly from any distance as shown in this photograph.

The property boundary at The Stables, Down Place between points 'a' and 'b' shown on the diagram below comprises a low rabbit fence as photographed on the right. This does not form a defensible boundary as described in Natural England's guidance.



AONB Boundary proposed by SCC study.



The Stables, Down Place is directly adjacent to the proposed boundary.

The road and high brick wall of the walled garden would provide a significantly more defensible boundary than the short wire rabbit fence along the boundary of The Stables.



Blackwell Farm extends between the Hog's Back ridge and the railway line indicated in the aerial photograph below.

Hog's Back ridge.

Ancient woodland would provide a defensible boundary on the eastern edge of Blackwell Farm.

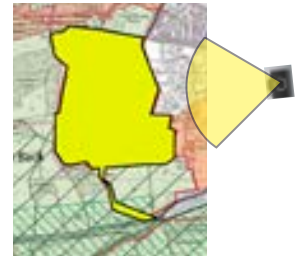
Railway line would form a defensible boundary on the northern edge of the AONB.



Surrey CC's AONB study proposes that the revised AONB boundary runs across the middle of this field. This is not a defensible boundary.

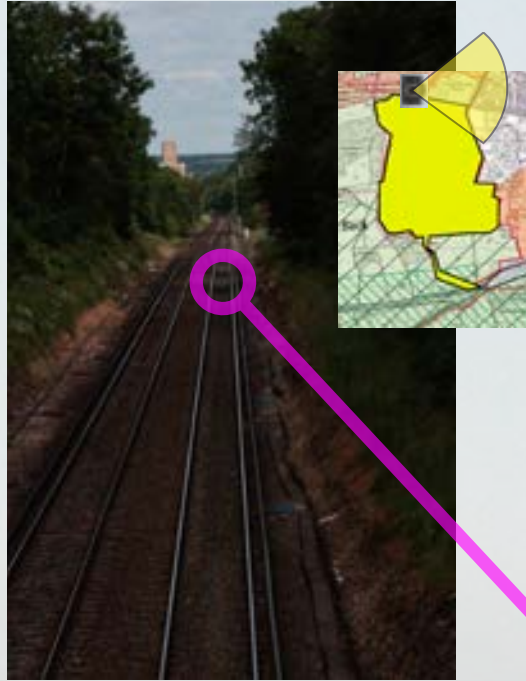
Down Place.

Existing University of Surrey development.



Google Earth image looking from Guildford towards the west

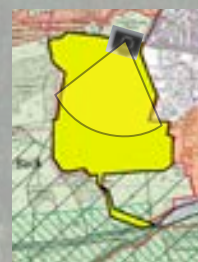
The railway line forms a strong and defensible boundary to the AONB. Broadstreet Common behind would provide protected views in and out of the AONB on the northern boundary of the AONB on the eastern edge of Guildford.



Railway line separates Blackwell Farm from Park Barn



Photograph on the left shows the view from the north-east corner of Blackwell Farm up towards the Hog's Back ridge.



John Norden's 1607 Guildford survey shows the historic setting. The deer leap forming the boundary of Guildford's Royal Park is still visible along the North eastern perimeter of Blackwell Farm.



Woking



North-east corner of site





Compton Parish council recommendations:

Natural England should, as a minimum, consider the independent landscape assessment on Blackwell Farm (by LMS) before making any decision to exclude the area from the study. Surrey County Council has stated that its study (commissioned in 2013) only sets out to justify why areas it has included in its own proposed extension to the boundary. The statement that the AONB “has to stop somewhere” is not justification for the indefensible line drawn on the northern boundary or why the area further north, up to the railway line, had not been assessed.

The analysis by LMS was undertaken prior to the examination of the Local Plan and to its controversial adoption by GBC. The assessment is in the public domain (submitted as part of Compton Parish Council’s consultation response to the Local Plan) and it would not therefore be a total surprise if Natural England agreed with the assessment of the land and included it as part of the AONB.

Compton PC believes that land should not be excluded because it is politically difficult, but should be considered purely on merit.

Blackwell and Manor farms provide the only remaining views of the Cathedral where it rises from an entirely rural setting. The ancient woodland visible on the left screens the development on Manor Park and the Research Park beyond.



A resident Yellow Hammer at Blackwell Farm. The Linnet and Sky Lark are other birds of principal importance found at Blackwell Farm.

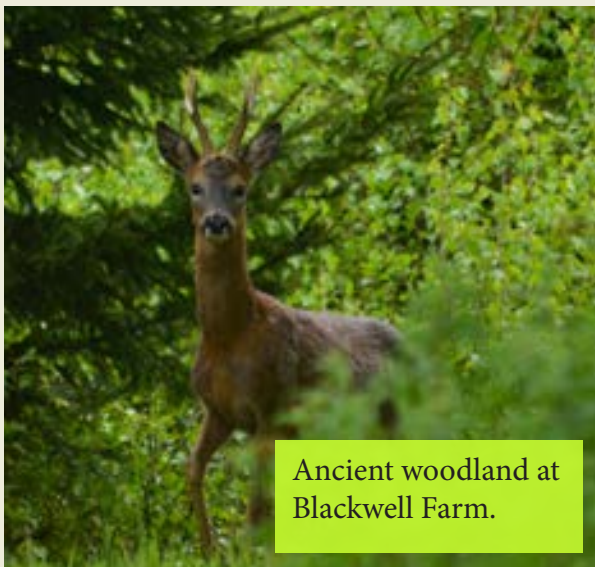


Spindle found on Blackwell and Manor farms hedgerows.

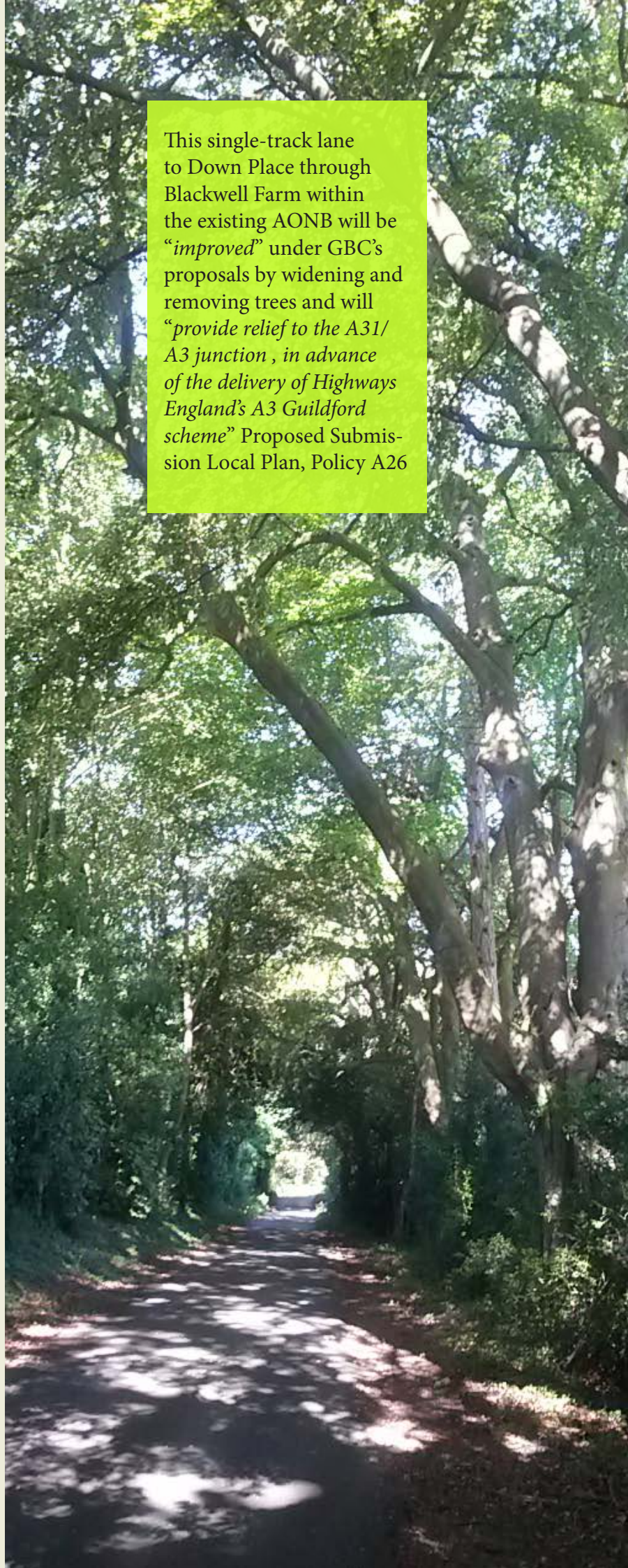
Attachments

Annex A - Planning Resource article re NE's SSSI designation at Swanscombe Peninsula

Annex B - *Hogs Back Natural Beauty evaluation – Land to the east of Flexford in the vicinity of Blackwell Farm, Down Place and Homestead Farm*, Land Management Services, May 2016



Ancient woodland at Blackwell Farm.



This single-track lane to Down Place through Blackwell Farm within the existing AONB will be “*improved*” under GBC’s proposals by widening and removing trees and will “*provide relief to the A31/ A3 junction , in advance of the delivery of Highways England’s A3 Guildford scheme*” Proposed Submission Local Plan, Policy A26

