

Appendix 10: Headley Hills

Please refer to Figure 19b

Additional responses from second (2024) statutory consultation are given in blue.

Overview

Question C1: Does the Headley Hills Extension Area have Sufficient Natural Beauty to be Designated as AONB?

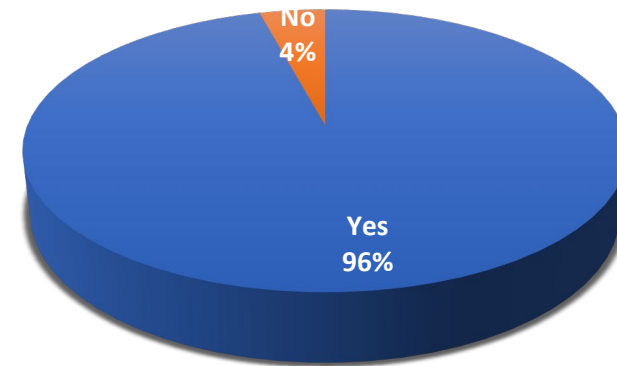
Natural Beauty	Responses
Yes	23
No	1
Not sure	0

Of the 24 respondents who answered Question C1, 23 respondents (96%) felt that the Headley Hills Extension Area has sufficient natural beauty to be designated as AONB.

Only 1 respondent answered no, this respondent answered no to this question for all Extension Areas.

Desirability issues included the importance of protecting open countryside especially in close proximity to London. These issues are addressed in Appendix 2.

Headley Hills - Sufficient natural beauty to be designated



Question C5: Do you agree with the proposed boundary for the Headley Hills Extension Area

Boundary	Responses
Yes	7
Yes, but I wish to suggest an alternative	16
No	3
Not sure	0

Of the 26 respondents who answered Question C5, 7 respondents (27%) agreed with the proposed boundary for the Headley Hills Extension Area and 3 respondents (11%) did not.

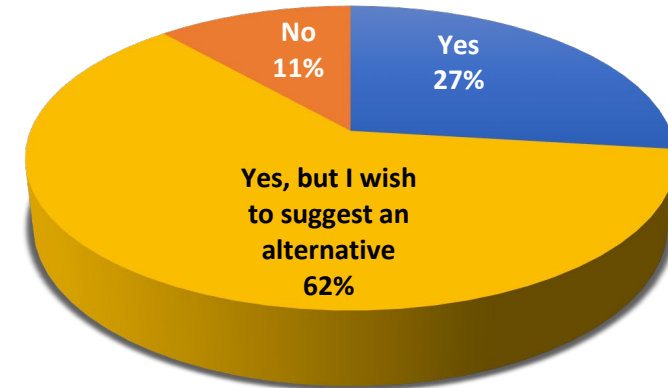
16 respondents (62%) agreed but wished to suggest an alternative boundary, many providing supporting evidence.

The additional areas of land that respondents wish to see included within the proposed extension are:

- Cherkley Court/Beaverbrook
- Land north of the M25 at Langley Vale and Epsom Downs and Walton-on-the-Hill
- Walton Heath and Banstead Heath
- Minor boundary adjustments south of the M25.

There are no requested exclusions.

Headley Hills - Agreement with the proposed boundary



During the second (2024) statutory consultation responses were received regarding **Addition 6: Land at Beaverbrook**. Natural England has reviewed these responses and provided further commentary in blue below.

Additional responses were also received relating to **Langley Valley, Walton-on-the-Hill, and Banstead Heath**. Natural England has reviewed these areas and provided further commentary in blue below.

Natural Beauty		
Theme	Representations	Natural England Commentary
The proposed extension meets the Natural Beauty Criterion	<p>Many respondents agreed that the proposed extension met the Natural Beauty Criterion.</p> <p>ANON-VUXE-WM1N-B <i>'The type of land around Headley is unique.'</i></p> <p>ANON-VUXE-WEW7-J <i>'Broadly speaking I am delighted with the extent of Surrey's landscape proposed for inclusion. Thanks must go to all those involved in evaluating the natural beauty of the landscape and desirability of extending the boundary across the Surrey Hills (and its valleys) and the impressive public engagement facilitated by the team.'</i></p> <p>ANON-VUXE-WEZ7-N (Mole Valley District Council) <i>'Yes. The Council agrees that this area has sufficient natural beauty and should be designated in accordance with the principles set out in Chapter 6 of Natural England's Guidance on Assessing Landscapes for Designation (June 2021).'</i></p> <p>ANON-VUXE-WSRS-Q <i>'Mixture of attractive woodland and open fields meets the 6 criteria for natural beauty.'</i></p> <p>ANON-VUXE-WMF9-B <i>'The area has a lot of natural beauty and historic landmarks such as the Church spire. There are bluebell woodlands and nature reserves in existence already. Too much encroachment is happening around the area and to the North part of the M25 proposals.'</i></p>	<p><u>Commentary</u></p> <p>Natural England agrees that land within the proposed Extension Area meets the natural beauty criterion for designation as AONB and that additional evidence provided by respondents supports the findings of the Natural Beauty Assessment.</p> <p>Natural England has also taken account of detailed responses requesting changes to the boundary and proposes some amendments. These are set out below.</p>

Natural Beauty		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<p><i>'The landscape is unspoilt and there exists a quiet harmony with the existing dwellings and the woodlands surrounding it.'</i></p> <p>ANON-VUXE-WEMS-4 <i>'This is an attractive landscape. I walk from time to time in the area and there are some important views within it and from the existing AONB. There are areas of ecological significance e.g. SWT's Nower Wood Reserve that contribute to the natural beauty of the area.'</i></p> <p>ANON-VUXE-WEMS-4 <i>'Absolutely stunning AONB, should have been part of the original boundaries a long time ago! Definitely a go!'</i></p> <p>ANON-VUXE-WEMS-4 <i>'It is important to preserve and manage the landscape around Headley that is not at present designated as AONB. Headley is in an elevated position on the North Downs and the landscape around the village is enjoyed by many local people and visitors for its natural beauty.'</i></p>	
The proposed extension does not meet the Natural Beauty Criterion	Respondent (ANON-VUXE-W5T8-Z) considered the area did not meet the Natural Beauty Criterion. No justification was given.	<p><u>Commentary</u> Natural England disagrees that the land identified for designation does not meet the Natural Beauty Criterion for the reasons set out in the Natural Beauty Assessment Report.</p> <p><u>Conclusion</u> No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
General agreement with proposed boundary	A number of respondents agreed with the proposed boundary and simply responded 'yes' on the response form.	<p>Commentary</p> <p>Natural England notes the support for the proposed boundary and has provided a detailed commentary to the boundary issues raised by other respondents, which can be found below.</p>
Requests for Additional Areas		
Extend boundary to include Cherkley Court/ Beaverbrook	<p>ANON-VUXE- WEZ7-N (Mole Valley District Council), ANON-VUXE- WEV7-H, ANON-VUXE- WEAP-N and ANON-VUXE- WEW7-J made the case that the whole of the Cherkley estate should be included within the proposed extension. The reasons given include:</p> <p>Natural Beauty:</p> <ul style="list-style-type: none"> • Rolling chalk topography • Historic landscape • Stane Street (Scheduled Monument) • Dramatic continuation of the broad sweep of landscape • Dramatic tree covered escarpment to the south • Magnificent long distance views • Mill Way public bridleway • Chalk grassland field along the A246/A24 • Spitfire carving – local artwork • Essential characteristics of Leatherhead Downs remains despite golf course • Active management • Tranquillity • Visually impressive and accessible 	<p>Commentary</p> <p>The Natural Beauty Assessment Report considered this area under EA7aNo. It noted that landscape quality was mixed stating that '<i>The development at Givons Grove on the outskirts of Leatherhead comprises a medium-sized private housing estate set within large gardens and woodland. To the east of this is the former parkland associated with Cherkley Court (a Victorian neo-classical mansion and estate). The former parkland has, over the last decade, become a golf course (Beaverbrook) and hotel. Although many of the parkland elements remain, including the lodge buildings, mature veteran trees/clumps and main driveway, the recreational use is nonetheless apparent including golf tees, greens and fairways as well as marked paths and signage which have undermined the integrity of the parkland. Coupled with the relatively urban aspect of this area, which slopes and extends towards Leatherhead, the landscape quality is judged to be transitional.</i>'</p> <p>Historic Landscape Characterisation notes that the land west of Stane Street had suffered field boundary loss prior to the creation of the golf course and, although the main access route to the house and park was from the north, the focus of the mansion house was southwards into the AONB.</p> <p>The Hankinson Duckett Associates assessment (2013) did not include the area as suitable for AONB designation in their assessment. This assessment was undertaken post planning permission for the golf course. Now that the golf course has been created, the effects of the fairways, bunkers, greens, flags, signage, restricted access, general activity is evident and most significantly felt on the land north of the bridleway</p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> AGLV Established relationship with the AONB to the south New ancillary golf club development has not interfered with the openness of the Green Belt or altered long views Includes limited built form and listed buildings of Cherkley Court Cultural associations to Lord Beaverbrook and Winston Churchill. <p>Desirability:</p> <ul style="list-style-type: none"> To protect as much of Surrey Hills outstanding landscape as possible More continuous landscape designation across the wider area Wider environmental and future lands management benefits for biodiversity, wildlife corridors Leaving the area out could impact on setting and scenic qualities of the existing and proposed AONB Extension Area. <p>Boundary: Should extend north and west to A24 and B2033 and follow public rights of way along edge of Givons Grove.</p> <p>The current boundary is considered a superficial boundary.</p>	<p>which cuts across the course from west to east. To the south of this, the land starts to dip southwards and views across the AONB open up increasing scenic qualities. Concerns regarding the landscape effects of the proposed golf course and hotel were raised by conservation bodies at the time the planning application was being decided.</p> <p>The Natural Beauty Assessment Report noted urban influences west of Stane Street including noise intrusion from the A24 and <i>'the more open character of this landscape and its less complex topography means that, whilst attractive, this area lacks the scenic qualities of the land further east.'</i></p> <p>In conclusion, the Natural Beauty Assessment Report stated <i>'the land to the west of Stane Street is affected by recreational uses and is transitional in terms of its landscape quality, becoming more influenced by the urban context as one moves west. In the south of the area the landscape slopes steeply towards the AONB and A24 corridor. Although heavily wooded, it contains the loose development of Givons Grove which is not considered suitable for inclusion within the AONB. The mansion house of Cherkley Court, and its designed gardens (now a hotel), have strong visual links to the wider AONB and steeply wooded slopes to the south. The existing AONB boundary in this location does not follow a clear feature on the ground and should be given particular scrutiny at the boundary setting stage. Overall, however, land to the west of Stane Street is not considered suitable for inclusion within the Candidate Area.'</i></p> <p>At the boundary assessment stage, particular scrutiny was given to the boundary around Cherkley Court/Beaverbrook <i>'where the existing AONB boundary does not follow a clear feature on the ground. Whilst the wooded grounds and designed gardens of Cherkley Court were regarded as high quality and visually connected to the AONB, the associated commercial development of the area, in terms of additional buildings, car parking and golf club house, presented difficulties in identifying a suitable alternative clear boundary on the ground. On balance this area was not included within the boundary.'</i></p> <p>This has been reviewed again in light of representations. Natural England remains of the view that the land used for the golf course does not qualify for inclusion within the</p>

Boundary		
Theme	Representations	Natural England Commentary
		<p>AONB. However, it has looked again at defining a boundary which would enable the mansion house/hotel and its grounds, as well as the woodland to the south, to be included given the higher scenic quality of this area and its visual connection to the wider AONB. A minor change to the boundary is therefore proposed, whereby the boundary follows the southern side of an access road from Stane Street heading west and then the southern side of the main hotel access drive before turning southwest beyond the Mansion House. The boundary then follows the northwest path to the designed gardens before adopting property boundaries heading south to join the existing AONB east of South Lodge.</p> <p>Conclusion Minor addition to include the mansion house at Beaverbrook and sloping designed gardens.</p> <p>(Addition 6 – Refer to Figure 19b)</p>
<p>Support for proposed Addition 6: Land at Beaverbrook</p>	<p>56 respondents) agreed with the designation of Addition A6, some providing reasons for their views as follows:</p> <p>ANON-PQ5Q-KRRC-S (Mole Valley District Council) <i>‘Yes, the Council agrees that this should be designated as part of the Surrey Hills National Landscape.</i></p> <p><i>While it is unfortunate that the full extent of the Council’s suggested amendment submitted at the initial consultation has not been accepted, it is considered that the methodology has been applied correctly and is consistent with other areas. The Council welcomes the addition of the Beaverbrook estate as shown on Map 19b, reference A6..’</i></p> <p>ANON-PQ5Q-KRT3-B</p>	<p>Commentary</p> <p>Natural England acknowledges the reasons given by respondents in support for this addition.</p> <p>2 respondents disagreed with the designation of Addition 6, but provided no reason for their view.</p> <p>Conclusion No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>[Anon] welcomed the proposed extensions of the AONB. The further additions now under consultation are also welcomed. In particular it is noted that a number of parks and gardens of interest as non-designated heritage assets are affected. These include Beaverbrook (formerly Cherkley Court)</i></p> <p>ANON-PQ5Q-KRHT-Z <i>'It is set in an area of natural beauty and needs to be preserved as an amenity for all.'</i></p>	
<p>Support Addition 6 but wish to see additional land included and an alternative boundary</p>	<p>4 respondents wished to comment on the proposed boundary of Addition 6, however, the first related to a different area, the second did not provide a comment, the third accepted the boundary as proposed and the fourth provided a comment and suggested an alternative boundary as follows:</p> <p>ANON-PQ5Q-KR4B-T Reasons given include:</p> <ul style="list-style-type: none"> • protect the views from the right of way to the SE • incorporate the historic Cherkley Court. <p><i>Proposed alternative boundary</i></p>	<p><u>Commentary</u></p> <p>Natural England has reviewed this response and confirms that the proposed addition includes the historic house at Cherkley Court (now Beaverbrook).</p> <p>Natural England does not consider it appropriate to extend the boundary further west to include the tumulus (given the change in context to a golf course and subtle quality of the feature resulting in a limited contribution to natural beauty).</p> <p>Natural England also does not consider it appropriate to include more woodland further west, given the presence of modern houses in this area. Natural England has taken care in defining the boundary in this difficult area and believes that the proposed boundary is the most suitable in these circumstances.</p> <p><u>Conclusion</u> No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<i>'The boundary could even be amended (extended) further to include (i) the Tumulus (and more) to the north-west and (ii) the woodland on either side of the north-south running footpath (between Givons Grove and Cherkley Court) where there is a rectangular / irregular notch in the boundary.'</i>	
<p>Include land north of the M25 at Langley Vale and Epsom Downs and Walton-on-the-Hill</p>	<p>ANON-VUXE-WEV4-E (Reigate and Banstead Borough Council) and ANON-VUXE- WS1D-7, ANON-VUXE- WEUJ-3, ANON-VUXE- WEAP-N, ANON-VUXE-WM8C-7, ANON-VUXE-WM1N-B, ANON-VUXE-WMJ8-E, ANON-VUXE-W5UR-U, ANON-VUXE-WSRS-Q</p> <p>ANON-VUXE-WE27-D (Epsom and Ewell Borough Council) although not submitting any evidence, expressed support for evidence submitted by third parties - <i>'We have not seen the evidence to justify such a change, however if additional evidence were to be submitted that justifies the inclusion of land within the borough within the AONB, we would be supportive of its inclusion.'</i></p> <p>Reasons given by respondents for including Langley Vale are summarised below:</p> <p>Natural Beauty:</p> <ul style="list-style-type: none"> • AGLV • Magnificent rolling chalklands and natural bowl of Epsom Downs • Dry chalk valleys, rolling chalk downland 	<p>Commentary</p> <p>The Natural Beauty Assessment Report considered this area as part of Evaluation Area 7b. It concluded at page 99 that <i>'There is evidence of natural beauty in the rolling wooded chalk landscape north of the M25 where it remains relatively intact and rural in character, i.e. the land which now forms part of the Langley Vale Centenary Woodland. The extent to which the Woodland Trust's proposals for nature conservation and creation of an evocative cultural landscape will positively affect the natural beauty of the landscape in future, is currently not fully understood. Furthermore, this landscape is significantly influenced by noise intrusion of traffic on the M25 due to topography and prevailing winds.</i></p> <p><i>Walton Down is recognised as valued for its chalk grassland and its aspect overlooking Langley Vale, however, the edges of this area are transitional, becoming increasingly influenced by Epsom Down Racecourse and the settlement of Langley Vale to the north and Walton on the Hill to the east. Similarly, to the east the landscape is transitional due to the influence of adjacent urban fringe and equestrian land uses and built development.</i></p> <p><i>Overall, therefore, the case for inclusion of this area is borderline and finely balanced. The extent of the qualifying area has been drawn conservatively to reflect these issues excluding land of lesser quality west and north on the edge of Ashted and Epsom, including land around Thirty Acre Barn, Epsom Down and land adjacent to Tadworth and Walton on the Hill.</i></p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> • Ancient woodland – Walton Park Wood, Great Hurst Wood, Little Hurst Wood and Sandhill Wood • Historic landscape reflected in field pattern and sheep walks/lanes • Woodland restoration (Woodland Trust Centenary Woodland) which enhance natural rolling hills, managing woods and new planting • Sculptures and visual interest as part of Centenary Woodland and commemoration of the fallen in the First World War • Wildflower planting adds visual interest through the seasons • High hedgerows and sunken lanes • Views from Epsom Downs are outstanding • Commemorative woodland is nationally important site • Walton-on-the-Hill founded in the 1st century by the Romans and was mentioned in the Doomsday book • Walton-on-the-Hill village pond • Historic racecourse – long history over 200 years • Sense of place and visual interest – open fields intermeshed with areas of woodland – contrasts of open and enclosure, hills and valleys • Feels remote given proximity to London – rural lanes are quiet and woodland and hedgerows contribute to feeling of remoteness 	<p><i>In relation to the qualifying area, particular scrutiny will be required in relation to a) the desirability of including Langley Vale within the AONB and b) the ability to define a suitable boundary within an area of transition at the desirability and boundary setting stages.'</i></p> <p>These issues were reviewed at the Desirability Assessment Stage. Pages 40-41 of the Desirability Report consider the matters arising from designation as follows <i>'The natural beauty assessment for the Langley Vale area, noted that it was borderline and the decision to include it in the Candidate Area was finely balanced. As noted above, this landscape forms part of the national Commemorative Woodland and is already managed by the Woodland Trust. It is therefore the focus of conservation and enhancement activity at a landscape scale, through the focus of a single organisation. Whilst the work of the Woodland Trust may benefit from access to increased resources through the AONB such as volunteers, as well as to increased funding, these benefits could be achieved through joint working with the AONB even if this area was excluded from the proposed Candidate Area. Given the transitional nature of the fringes of this area, the presence of adjacent non-qualifying land, and the effects of traffic noise on natural beauty, (as set out in the natural beauty assessment), it is concluded that there is no strong desirability reason which strengthens the argument in favour of taking this land forward for designation. This should be taken into account at the boundary setting stage (refer to Headley Hills writeup in Boundary Considerations Report).</i></p> <p>The Desirability Report concluded at paragraph 7.2.2-3 that <i>'Designation as AONB would bring positive benefits and help to address the issues affecting special qualities in the majority of areas. However, the case is less strong for Langley Vale and Banstead Heath, given their natural beauty is borderline, and the current management arrangements for these areas already address the issues affecting them.</i></p> <p><i>On this basis, it is proposed that the Candidate Area is taken forward to the boundary setting stage but that further scrutiny is given to the Langley Vale and Banstead Heath areas.'</i></p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> Few roads cross the area M25 and aircraft noise is apparent in area around Wooton Park Wood but most of the area is very tranquil due to geomorphology Five physical links across the M25 to the wider AONB M25 is largely invisible – eye is drawn to Headley Church Notable improvement in biodiversity as a result of management by Woodland Trust – skylark and lapwings In the southern corner the noise of the M25 is intrusive along with scramble and quad bike track, pylon line and stable complexes and some development along Love Lane and Sturt's Lane. <p>Desirability:</p> <ul style="list-style-type: none"> Development attack – last chance saloon to protect the area – designation would secure its future from encroachment of urban influences Including countryside close to where people live into London Designation as AONB would combine with The Woodland's Trust ownership and attract funding and volunteers to help management People struggle to understand why the area is not in the AONB Would strengthen the overall AONB designation 	<p>The Boundary Considerations Report concluded at pages 27-28 that <i>'In relation to Langley Vale, the natural beauty of the area was considered to be borderline, in part due to lack of strongly defined scenic qualities, and the significant impact of noise intrusion from the M25. This latter influence is particularly felt in this area as a result of prevailing wind conditions and topography, such that the traffic noise tends to reverberate within the vale. More detailed assessment during the boundary setting stage confirmed that the level of noise intrusion was considered to be sufficiently high across the area as a whole, and to impact on perceived tranquillity and relative wildness, as well as perceptions of scenic quality, which relies on the stimulation of the senses. In close proximity to the M25, these effects were found to be particularly pronounced, and coupled with other land uses such as motor racing and subdivision of fields for equestrian use, signage, lighting, masts and pylons, resulted in a cumulative effect of incongruous features which detract from natural beauty.</i></p> <p><i>Further north, the landscape is transitional and build development at Walton on the Hill as well as the infrastructure associated with Epsom Racecourse, visually intrudes on the area. In accordance with Natural England Guidance, the definition of a boundary in a transitional landscape should be drawn conservatively within the transition, including land at the higher quality end of the transition. Application of this consideration in the Langley Vale landscape raised concerns regarding the definition of a boundary which was likely to become overly complex and convoluted following field boundaries and edges of woodland. Furthermore, the qualities of the area, which were articulated in detail in the natural beauty assessment, were noted as under active management by the Woodland Trust as part of the establishment of a Commemorative Woodland. The qualities of this landscape are likely to be conserved and enhanced through this initiative. On balance therefore, taking all the above issues into account, it was concluded that the merits of this area were not sufficiently high to warrant inclusion within the AONB boundary and that a suitable boundary should be defined to the south of the M25.'</i></p> <p>Natural England has reviewed the evidence submitted by respondents regarding the inclusion of Langley Vale and Epsom Downs. The reasons given and evidence put</p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> Increasing biodiversity and contribution to nature recovery Include lesser quality land in south as it provides a strategic link to land at Walton and Banstead Heaths AGLV will probably be lost and in Green Belt but pressure for this to be watered down and no local landscape policy likely in the Local Plan Protect from encroaching urban influences. <p>Boundary: A number of boundary options are proposed including:</p> <p>The boundary put forward by ANON-VUXE-WEV4-E (Reigate and Banstead Borough Council) extends along the Parish boundary and Sheep Walk as far as Walton Downs, and heads south along the edge of build development at Tadworth and the western edge of Walton-on-the-Hill. It does not follow the settlement boundary of Walton-on-the-Hill but rather includes land in the north, in order to connect with the proposed extension at Banstead Heath. Walton-on-the-Hill, whilst not proposed for inclusion per se, is nonetheless split by the proposed boundary. No land is proposed in Epsom and Ewell (i.e. the northern end of Langley Vale and Walton Downs).</p> <p>ANON-VUXE- WS1D-7 and ANON-VUXE- WEUJ-3 put forward a different, more conservative boundary which extended into Epsom and Ewell, although not</p>	<p>forward was similar to that submitted during the 'Call for Evidence' and the issues raised were considered during the assessment process.</p> <p>Natural England remains of the view that this area should not form part of the boundary extension to the Surrey Hills AONB.</p> <p>Boundary: Natural England has reviewed the boundary options put forward by respondents.</p> <p>In reviewing the boundary options, Natural England is mindful that there have been no representations from the Woodland Trust or Epsom Racecourse.</p> <p>The three boundary options put forward illustrate the issues associated with defining a boundary in this area which:</p> <ul style="list-style-type: none"> excludes lesser quality land. avoids the splitting of a settlement. includes a small area of land within an additional neighbouring authority. requires the wash over of significant road infrastructure and focuses in an area of land which is already positively managed as part of a Commemorative Woodland. <p>Even if land was considered suitable to include within a proposed extension to the Surrey Hills these issues would need to be resolved. Natural England remains of the view that the proposed boundary along the M25 is robust.</p> <p>Conclusion No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p>onto Walton Downs, and pulled back from the edge of Walton-on-the-Hill (avoiding the splitting of the settlement) and excluding some areas of equestrian land use.</p> <p>The boundary put forward by ANON-VUXE-WEAP-N (Surrey Hills AONB) is the widest of boundary options extending into Epsom and Ewell, including Walton Downs and effectively adopting the Area of Great Landscape Value boundary.</p> <p>ANON-PQ5Q-KR3K-2 (Reigate & Banstead Borough Council)</p> <p><i>'We appreciate that the Headley Hills has been proposed but are disappointed that the area from Walton on the hill to Langley Vale has been excluded.... We would consider that the inclusion of horse uses would result in a less complicated and convoluted boundary in this location.'</i></p> <p>ANON-PQ5Q-KR4P-8</p> <p><i>'The areas meet most of the other criteria and it is likely that in future noise from the M25 will be reduced due to the use of electric vehicles and resurfacing with a quieter material than the current concrete.'</i></p>	<p><u>Commentary</u></p> <p>Natural England set out (on pages 9-12 above) the reasons for excluding Langley Vale which included the fact that the natural beauty of the area was considered to be borderline and transitional. Concerns were also highlighted <i>'regarding the definition of a boundary which was likely to become overly complex and convoluted following field boundaries and edges of woodland'</i>. Natural England acknowledges the view of respondent ANON-PQ5Q-KR3K-2 that inclusion of horse uses may result in a less complicated and convoluted boundary, if this land was considered to qualify for designation. However, as noted above, Natural England has concluded that this area on balance does not qualify for designation. Furthermore, the proposed boundary along the M25 remains the least complicated and convoluted option and, taking all factors into account, remains the most robust.</p> <p>Natural England acknowledges that in future, noise from the M25 may decrease as a result of electric vehicles and the use of low-noise road surfaces. However, the assessment of natural beauty is considered in terms of the current landscape, not the future potential for improvement (Natural England Guidance para 6.10, final bullet). For this reason, these potential changes are not taken into account when considering the inclusion of land.</p>

Boundary		
Theme	Representations	Natural England Commentary
		Conclusion No change.
Include Walton Heath and Banstead Heath and Walton-on-the-Hill	<p>ANON-VUXE-WEV4-E (Reigate and Banstead Borough Council), ANON-VUXE- WS1D-7, ANON-VUXE- WEAP-N, ANON-VUXE-WE1C-R, ANON-VUXE-W5FR-C, ANON-VUXE-WMJ8-E, ANON-VUXE-WSRS-Q</p> <p>The reasons for this are summarised below:</p> <p>Natural Beauty:</p> <ul style="list-style-type: none"> • Beautiful • Visual variety and mosaic of vegetation • Common is managed by the Banstead Commons Conservators and volunteers and retains a mix of open grassland, hedgerows and trees • Intrinsic part of the North Downs with its chalk rolling countryside, woodland and acidic grasslands • Contains important wildlife inc skylarks, Meadow pipits, Woodlarks, Stonechat • Stunning environment with native species of trees and wildlife • Historically important • Unique • Historically the windmill at Tadworth was visible but over time this view has been 	<p>Commentary</p> <p>The Natural Beauty Assessment Report considered this area as part of Evaluation Area 7c. It concluded at page 102-103 that <i>‘There is some evidence to support the inclusion of Banstead Heath within a Candidate Area for designation as AONB as result of its extensive open grassland semi-natural habitat, seasonal variation and cultural heritage. However, this area is also significantly affected by road noise which is evident across the area and greatest in winter and when prevailing winds are north-westerly. In the area to the north, where the common is in closer proximity to conurbations, the landscape is fragmented by busy roads and some urban fringe land uses have encroached and natural beauty is not considered to be met. Similarly, to the southeast the landscape lacks natural beauty where it forms arable farmland on the fringes of Lower Kingswood and across Walton Heath Golf Course where land use has altered natural habitat patterns and the landscape is especially affected by road noise from the M25.</i></p> <p><i>Overall, therefore, the case for inclusion of this area is borderline and the extent of the qualifying area has been drawn conservatively to reflect these issues, excluding land of lesser quality as noted above.</i></p> <p><i>In relation to the qualifying area, particular scrutiny will be required in relation to a) the desirability of including Banstead Common within the AONB and b) the ability to define a suitable boundary which contexts the area to the existing AONB.’</i></p> <p>These issues were reviewed at the Desirability Assessment Stage. Page 41 of the Desirability Report considered the matters arising from designation as follows <i>‘This area was noted in the natural beauty assessment as borderline and the decision to</i></p>

Boundary		
Theme	Representations	Natural England Commentary
	<p>obscured by tree growth which could be restored</p> <ul style="list-style-type: none"> • Sound of church bells from St Andrews Church – spire is visible from parts of Banstead Heath • Extensive unbroken views to the south from Mill Lane • Golf course creates a coherent link between Langley Vale and Banstead Downs • Road improvements and some relatively hidden urbanisation but heath remains intact • Remoteness of the heath • Visually Banstead Heath flows into Walton Heath • Aircraft noise is less noticeable and does not disturb conversations • Less weight given to the intrusive A217 and M25 - noise from vehicles is noticeable up to about 150m from the road, whereafter the visitor feels that they are in the countryside and birdsong can be heard • The M25 is in a cutting to the south and can be heard subject to wind direction. However, the woodland between the Walton Heath and Banstead Heath means that the road noise is barely audible in much of the wood and as a result is a peaceful haven punctuated by birdsong • Golf course is exceptional example of heathland landscape and many famous people have played there 	<p><i>include it in the Candidate Area was finely balanced. As noted above, this landscape is already managed by the Banstead Common Conservators and therefore the focus on landscape scale conservation and enhancement through a single organisation is already in place. Nevertheless, it is noted that the work of the Banstead Common Conservators may benefit from access to increased resources including volunteers, as well as to increased funding. However, it is also acknowledged that these benefits could be achieved through joint working with the AONB even if this area was excluded from the proposed Candidate Area. Given the poor connection of this land to the wider AONB due to non-qualifying land at Walton Heath golf course and Lower Kingswood, as well as the effects of road noise on the natural beauty of this landscape, it is concluded that there is no strong desirability reason which strengthens the argument in favour of taking this land forward for designation. This should be taken into account at the boundary setting stage (refer to Headley Hills writeup in Boundary Considerations Report).'</i></p> <p>The Desirability Report concluded at paragraph 7.2.2-3 that '<i>Designation as AONB would bring positive benefits and help to address the issues affecting special qualities in the majority of areas. However, the case is less strong for Langley Vale and Banstead Heath, given their natural beauty is borderline, and the current management arrangements for these areas already address the issues affecting them.</i></p> <p><i>On this basis, it is proposed that the Candidate Area is taken forward to the boundary setting stage but that further scrutiny is given to the Langley Vale and Banstead Heath areas.'</i></p> <p>The Boundary Considerations Report concluded at pages 28 that '<i>In relation to Banstead Heath the natural beauty of the area was considered to be marginal, in part due to the homogenous character of the area and lack of strongly defined scenic qualities. In addition, noise intrusion from the M25 (due to prevailing wind conditions and topography), as well as traffic noise from other surrounding A roads, was found to extend across the area. Detailed assessment during the boundary setting stage confirmed that traffic noise impacted on perceived tranquillity and relative wildness, as well as perceptions of scenic quality, which relies on the stimulation of the senses.</i></p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> Golf course is of high scenic quality - undulating, mature trees (oaks and Scots pine), heathland in fairways When golfers are not playing, the area feels remote Golf course is managed for nature conservation Golf course is more manicured than land in Banstead Heath Noise of roads does not drown out birdsong Roads which transverse the area are no different from other parts of the AONB Commons status means little encroachment from development Higher quality landscape than parts of Chipstead Valley No different from the landscape south of the M25 AGLV. <p>Desirability:</p> <ul style="list-style-type: none"> Need to be designated to protect them Increases the depth of the Surrey Hills AONB in this location – at its narrowest point Provide opportunities for a cohesive approach to future land management Setting of the AONB Banstead Heath would benefit from additional funding and manpower. 	<p><i>Close to the M25, around Mogador, these effects were found to be particularly pronounced and coupled with adjoining land uses such as the Walton Heath golf course and open farmland towards Lower Kingston (areas not considered to meet the natural beauty criterion), gave rise to a more tenuous link to the existing AONB. Consideration was given to the possibility of the application of the 'wash-over' principle in order to widen the connection between Banstead Heath and the existing AONB. However, areas to be 'washed over', be they Walton Heath or Lower Kingswood farmland, are not surrounded by qualifying land. Furthermore, the qualities of Banstead Common, which were articulated in detail in the natural beauty assessment, were noted in the desirability assessment as under active management by the Banstead Common Conservators. The qualities of this landscape are likely to be conserved and enhanced through this active management. On balance therefore, taking all the above issues into account, it was concluded that the merits of this area were not sufficiently high to warrant inclusion within the AONB boundary and that a suitable boundary should be defined to the south of the M25.'</i></p> <p>Natural England has reviewed the evidence submitted by respondents regarding the inclusion of Walton Heath and Banstead Heath. Many of the arguments put forward by respondents were previously put forward during the 'Call for Evidence'. However, considerable additional, and more detailed, information on aspects of nature conservation and management were also provided.</p> <p>Natural England has reviewed the evidence which has been submitted. Natural England accepts that this area of open heathland and common is extensive and unusual given its context close to London.</p> <p>The assessment of tranquillity, as with all natural beauty factors, has been undertaken within the context of the Surrey Hills. Natural England disagrees that less weight should be given to the noise intrusion of the A217 and M25 in order to justify the inclusion of this area. It is Natural England's view that the effect of noise intrusion is sufficiently high to adversely affect tranquillity and perceptions of scenic and landscape quality, and for the overall weight of natural beauty to not be sufficiently high to warrant national landscape designation.</p>

Boundary		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<p>Boundary: A number of boundary options are put forward.</p> <p>ANON-VUXE-WEV4-E (Reigate and Banstead Borough Council) put forward a boundary which broadly follows the AGLV, and includes a section of the A217</p> <p>ANON-VUXE- WS1D-7 present a more conservative boundary which follows Dorking Road, Mill Road and a section of the A217, therefore excluding the most heavily used areas of common.</p> <p>ANON-VUXE- WEAP-N put forward a boundary which follows the AGLV but also includes farmland to the west of Lower Kingswood.</p>	<p>Desirability: Natural England accepts that in this very narrow part of the Surrey Hills AONB there would be benefit in bringing in this larger area of land if it met the natural beauty criterion.</p> <p>It is noted that respondents consider that AONB designation would assist with provision of expert advice, organising volunteers and habitat improvement and that the Conservators have lost some EU Funding, and Reigate and Banstead Borough Council is not in a position to meet the shortfall. Nevertheless, Natural England is also of the view that AONBs are increasingly working beyond their boundaries in collaborative conservation initiatives and that such opportunities exist for Banstead and Walton Heaths.</p> <p>Natural England remains of the view that this area is finely balanced and that, on balance, it should not form part of the boundary extension to the Surrey Hills AONB.</p> <p>Boundary: Natural England has reviewed the boundary options put forward by respondents.</p> <p>The three boundary options put forward by respondents illustrate the issues associated with defining a boundary in this area which:</p> <ul style="list-style-type: none"> • excludes lesser quality land • requires the wash over of significant road infrastructure • focuses in an area of land which is already positively managed. <p>Even if land was considered suitable to include within a proposed extension to the Surrey Hills these issues would need to be addressed. Natural England remains of the view that the proposed boundary along the M25 is robust.</p> <p><u>Conclusion</u> No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p>ANON-PQ5Q-KR3K-2 (Reigate & Banstead Borough Council)</p> <p><i>'..we note that the Consultation Report 2024 page 24 states that; 'the natural beauty was considered marginal due to the homogenous character of the area and lack of strongly defined scenic qualities.' We also note that there were concerns raised with regard to the road noise adversely affecting the tranquillity. We would consider that a more holistic view is required in this location as the proposed changes to the NPPF could see some of the land being developed which overtime would adversely affect the National Landscape setting. Furthermore, proposed extensions near the Hogsback are equally impacted by road noise from the A31 which is mentioned but seems to have been outweighed by the landscape quality.'</i></p>	<p><u>Commentary</u></p> <p>Natural England has addressed concerns regarding the potential development of 'grey belt' as defined in the NPPF (Dec 2024) in Appendix 2 (page 28). Grey belt is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of the purposes a), b) and c) in paragraph 143.</p> <p>Natural England is not aware of any current planning applications/permissions in this area which should be taken into account in defining the proposed boundary. Decisions to allow development within the setting of an AONB must take account of the effects this has on the special qualities of the designation as set out in paragraph 189 of the NPPF. Natural England Guidance, on identifying land for national designation, does not allow for the inclusion of land simply to protect the setting of an AONB.</p> <p>Road noise has been a significant consideration during the boundary review for the Surrey Hills. During the assessment of natural beauty, Natural Beauty Factors (as defined in the Natural England Guidance, Appendix 1), are taken into account. Each area which is assessed has its own set of issues and qualities, and is considered on its merits. It is the overall weight of evidence in support of designation which determines judgements, rather than the presence or absence of road noise. It is not appropriate to consider road noise in isolation and to compare road noise in one area with that of another area.</p> <p>On balance, Natural England remains of the view that land at Banstead Heath should remain excluded from the proposed boundary extension.</p> <p><u>Conclusion</u> No change.</p>

Boundary		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
Minor boundary adjustments south of the M25 in vicinity of Mogador	<p>ANON-VUXE- WEV7-H and ANON-VUXE- WS1D-7 Reasons given include:</p> <ul style="list-style-type: none"> • Current AONB boundary predates the M25 • Boundary anomaly. <p>Desirability:</p> <ul style="list-style-type: none"> • Protect the area from development which may adversely affect the chalk scarp immediately to the south and Colley Hill. <p>Boundary:</p> <ul style="list-style-type: none"> • Use bridleway 101/101a and bridleway 87 to include all land south of the M25 • Include this area as well as Walton Heath and Banstead Heath. 	<p><u>Commentary</u></p> <p>Natural England has reviewed the evidence put forward for addressing the boundary anomalies along the M25. Bridleway 101 runs to the north of the M25 through the Walton Golf Course, with bridleway 87 heading south through woodland towards the road bridge over the M25 south of Mogador.</p> <p>Natural England has set out why land north of the M25 and the Walton Golf Course is considered to not meet the Natural Beauty Criterion. Furthermore, Natural England does not consider the bridleway to be a suitable boundary to the AONB where it cuts across the golf course. Natural England also does not consider the small additional area of land, north of the M25 and within the golf course, to be so exceptional as to justify the washing over of the M25 in this location. Natural England also does not consider it appropriate to address the boundary anomalies created by the M25 through the designation of additional land which is not considered to meet the Natural Beauty Criterion. The Surrey Hills Boundary Review has not considered the de-designation of land within the Surrey Hills AONB.</p> <p><u>Conclusion</u> No change.</p>