

## Appendix 15: Limpsfield

Please refer to Figure 23b

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

### Overview

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

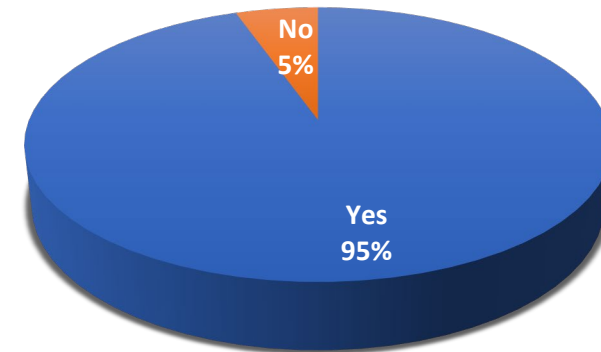
Natural Beauty	Responses
Yes	35
No	2
Not sure	0

Of the 37 respondents who answered Question C1, 35 respondents (95%) felt that the Limpsfield Extension Area has sufficient natural beauty to be designated as AONB.

In contrast 2 respondents (5%) felt that the Limpsfield Extension Area does not have sufficient natural beauty to be designated as AONB.

Desirability reasons for including and excluding land within the proposed extension focused on current land management and restrictions to landowners and farmers as well as the need to join up protected areas in order to address biodiversity decline. These issues are addressed in detail in Appendix 2.

Limpsfield - Sufficient natural beauty to be designated



Question C5: Do you agree with the proposed boundary for the Limpsfield Extension Area?

Boundary	Responses
Yes	8
Yes, but I wish to suggest an alternative	21
No	5
Not sure	2

Of the 36 respondents who answered question C5, 8 respondents (22%) agreed with the proposed boundary for the Limpsfield Extension Area and 5 respondents (14%) did not. 21 respondents (58%) agreed but wished to suggest an alternative boundary, many providing supporting evidence.

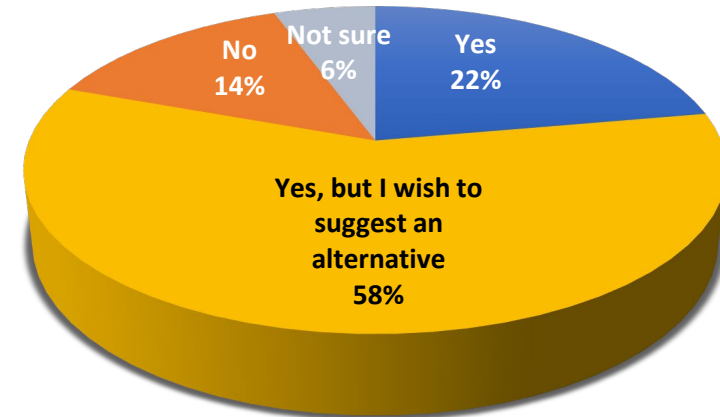
Many of the responses made similar points and revisions to the boundary focused on its southern extent. A number of the responses were identical.

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

- Extension to the railway line to include Staffhurst Wood and other woodlands to the southwest
- Extension as far as the High Weald AONB

There are no requested exclusions.

Limpsfield - Agreement with the proposed boundary



During the second (2024) statutory consultation, responses were received regarding **Addition 12: Land south of Staffhurst Wood**. Natural England has reviewed these responses and provided further commentary in blue below.

Natural Beauty		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
<b>The proposed extension meets the Natural Beauty Criterion</b>	<p>Many respondents agreed that the proposed extension met the natural beauty criterion.</p> <p><b>ANON-VUXE-MWUS-M</b>  <i>'The positive inclusion into the AONB of Limpsfield Area of Great Landscape Value has long been called for. This was a common local comment, endorsed and supported by [Anon] and Tandridge District Council. It abuts Kent Downs AONB.'</i></p> <p><b>ANON-VUXE-WES8-F</b>  <i>'The area fulfils many of the 6 tests of natural beauty..... The area has woodland, heathland and is visited by people outside of the area to see the beautiful countryside.'</i></p> <p><b>ANON-VUXE-WEP2-6</b>  <i>'Superb landscape, views across the vale.'</i></p> <p><b>ANON-VUXE-WMM2-B</b>  <i>'A diverse beautiful Surrey landscape with mature wooded areas and green field landscapes, all below the wonderful North Downs... Already a conservation area, the extension would seem the perfect way of maintaining the area's distinctive features.'</i></p> <p><b>ANON-VUXE-WEQG-V</b>  <i>'Overall very beautiful and scenic area of North Surrey.'</i></p> <p><b>ANON-VUXE-WM6H-A</b></p>	<p><b><u>Commentary</u></b></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>

Natural Beauty		
Theme	Representations	Natural England Commentary
	<p><i>'The area has plentiful natural beauty. A walk or cycle ride around the area clearly illustrates this.'</i></p> <p><b>ANON-VUXE-WM6N-G</b></p> <p><i>'A very historic, interesting and out of the way place that comes from nowhere and goes to nowhere and has thus been just left alone to develop naturally and long may it continue....unspoilt countryside...beautiful'</i></p> <p><b>ANON-VUXE-W5ZC-H</b></p> <p><i>'The extraordinary nature of the Limpsfield Common is renowned for its peace, beauty, views and tranquillity'</i></p> <p><b>ANON-VUXE-WMYX-W</b></p> <p><i>'the 66-mile Vanguard Way trail from Croydon to Newhaven, which passes through this area... It is acknowledged by all who follow it to be one of the trail's loveliest sections.'</i></p>	
<b>The proposed extension does not meet the Natural Beauty Criterion</b>	<p><b>ANON-VUXE-WM5T-N</b> and <b>ANON-VUXE-W5T8-Z</b> did not consider the proposed Extension Area to meet the natural beauty criterion but did not provide any natural beauty reasons for this view. Reasons put forward relate to desirability issues and are summarised as follows:</p> <ul style="list-style-type: none"> <li>• Land is very well looked after by the current landowners and farmers</li> <li>• Restrictions to farmers and landowners will make their lives more difficult</li> </ul>	<p><b>Commentary</b></p> <p>The reasons put forward are considered in Appendix 2.</p>

Boundary		
Theme	Representations	Natural England Commentary
General agreement with proposed boundary	<p>A number of respondents agreed with the proposed boundary simply answering yes to the consultation question and providing no additional information. Some did provide additional commentary including:</p> <p><b>ANON-VUXE-WS1M-G</b> <i>'[Anon] fully support the extension of the AONB at Limpsfield...'</i></p> <p><b>ANON-VUXE-WMUS-M</b> <i>'I agree with the proposal to extend the area as Natural England has set out.'</i></p> <p><b>ANON-VUXE-WM6H-A</b> <i>'The proposed boundary is a sensible suggestion.'</i></p> <p><b>ANON-VUXE-WMN1-B</b> <i>'It includes areas of natural beauty that are worthy of added protection.'</i></p>	<p><b>Commentary</b></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		
Include land further to the south as far as the east-west railway line and including Honesland Wood, Merle Common, Earls Wood and	<p><b>ANON-VUXE-WE74-F/WSQN-H</b> (Tandridge District Council) and <b>ANON-VUXE-WES1-8, ANON-VUXE-WEJ4-2, ANON-VUXE-WEKG-P, ANON-VUXE-WEZJ-8, ANON-VUXE-WE11-6, ANON-VUXE-WENV-8, ANON-VUXE-WS1P-K, ANON-VUXE-WERX-E, ANON-VUXE-WECX-Y, ANON-VUXE-WEXW-K, ANON-VUXE-WEQH-W, ANON-VUXE-WERK-1, ANON-VUXE-WED9-1,</b></p>	<p><b>Commentary</b></p> <p>The Natural Beauty Assessment considered this area as part of EA10c. The assessment highlighted that the landscape is in transition from the more elevated and undulating landscape associated with the greensand hills to the gently undulating and wooded landscape of the Low Weald. In particular, and in relation to the southern part of the EA10c it noted the ancient woodland, natural and cultural heritage and good condition of features but it also noted the larger scale field pattern, increased incidence of arable farming and loss of longer distance views. Overall, it concluded that <i>'To the south and east, where the landscape is in transition, becoming more open and less</i></p>

Boundary		
Theme	Representations	Natural England Commentary
Staffhurst Wood.	<p><b>ANON-VUXE-WES8-F, ANON-VUXE-WEWM-8, ANON-VUXE-WEP2-6, ANON-VUXE-WMUS-M</b></p> <p><b>Reasons include:</b></p> <p><b>Natural Beauty</b></p> <ul style="list-style-type: none"> <li>Staffhurst Wood is a really important, ancient woodland that is so beautiful and is an SSSI</li> <li>The woodlands themselves are of high quality and designated ancient woodland.</li> <li>The open aspect of the neighbouring fields, small field sizes affords spectacular views of the greensand ridge.</li> <li>Rural lanes e.g. Grant's Lane</li> <li>Exceptional peace, bluebells and wildlife</li> <li>The Woodland Trust describe Staffhurst Wood as a nationally important site which boasts 200 species of flora and 288 species of moth fauna including orthosis populeti.</li> <li>Enjoyed by many locals</li> <li>Visually appealing</li> <li>Diverse and richly textured mosaic of woodland, pastures and farmland create a highly scenic landscape</li> <li>Strong sense of tranquillity and connection to nature.</li> </ul> <p><b>Desirability:</b></p> <ul style="list-style-type: none"> <li>This area is subject to pressure for development from neighbouring Edenbridge</li> </ul>	<p><i>distinctive, it is considered to comprise attractive countryside. This area is not regarded as meeting the natural beauty criterion.'</i></p> <p>In setting out the issues to be addressed in defining extent it noted:  <i>'There is a transition in landscape quality on the slopes to the south of the greensand ridge due to reduced topographic variation and less distinctive landform, as well as more intensive arable farming where the landscape forms attractive countryside but lacks the distinctive qualities and features found on the greensand hills to the north. This is particularly the case south of the ridge near Hart's Lane and Southlands Lane and to the southeast of Itchingwood Common. Care should be taken at the boundary setting stage to draw a boundary within the high-quality end of the transition in accordance with Natural England Guidance.'</i></p> <p>As a result, the Candidate Area was defined to include the greensand hills and the lower transitional slopes with the intention of defining a boundary at the higher end of the transition (in accordance with Natural England boundary considerations), focusing on the greensand hills. This approach is consistent with the way in which the southern boundary of the Kent Downs AONB has been defined immediately to the east.</p> <p>Natural England acknowledge that the land south of the proposed boundary contains listed buildings such as Gullivers and Couldens Farm and other dispersed rural settlement and that the ancient woodlands associated with Staffhurst Wood are either SSSI or SNCI, exhibiting natural heritage interest such as bluebells in spring. These features contribute to the natural beauty of the area. Furthermore, Natural England acknowledge that the shallow valley of the Crooked River also creates topographic variation through this landscape adding to its scenic qualities, albeit it lacks the interest and drama of the greensand hills to the north. Beyond the railway to the south, the landscape is not considered to meet the natural beauty criterion and the nature of the Statutory Consultation responses would tend to support this view.</p> <p>Natural England is therefore of the view that the transitional nature of the landscape continues beyond the Candidate Area as far as the southern railway and that Staffhurst Wood and other ancient woodlands are features within this wider landscape transition. Natural England note that these woodlands comprises beech, oak, hornbeam, birch,</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p>Other respondents cited the need to provide better planning protection to the land for example respondent <b>ANON-VUXE-WEZJ-8</b> stated that:</p> <p><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></p> <p><b>Boundary</b> The proposed boundary extends along Red Lane and Dwelly Lane as far as the railway, then turns east for a short distance before adopting a footpath and then Grants Lane and then Monks Lane then Guilables Lane and then a track heading east as far as the Kent Downs AONB boundary.</p>	<p>sweet chestnut and aspen and are particularly valued for their display of bluebells in Spring. Natural England recognise that this woodland is regarded as peaceful, tranquil and visually appealing and is of importance to local residents.</p> <p>When defining the boundary, the Boundary Considerations Report directly addressed the issue of the transitional landscape stating <i>‘The second issue related to the transitional quality of the landscape in the south, as the landscape progresses from the steep, and sometimes convoluted, slopes of the greensand hills, to the lower lying (although still undulating) slopes of the Low Weald. This transition is reflected in a gradual reduction in elevated views, less frequent ancient woodland and an increase in arable cultivation, such that landscape qualities are declining. The natural beauty assessment highlighted the need for particular scrutiny at the boundary setting stage, to define the boundary within the transition.’</i></p> <p>It went on to state <i>‘In terms of defining the southern boundary to this area, consideration was given to the transitional nature of the landscape. A boundary was identified within the transition, enabling the steepest slopes and historic settlement, to be included along with wooded shaws and Itchingwood Common. The boundary adopts rural lanes within the transition wherever possible.’</i></p> <p>Natural England Boundary Considerations Report also address ‘features of interest’, such as Staffhurst Wood, stating that <i>‘Areas and features of wildlife, geological, geomorphological, historic, cultural or architectural value which are situated on the margins of a National Park/AONB should be included where practicable providing that they are situated within a tract that meets the statutory criteria.’</i></p> <p>In reviewing this area Natural England is of the view that Staffhurst Wood forms part of a transitional landscape from the greensand hills. Natural England also considers that the proposed boundary is drawn conservatively within the transition, that Staffhurst Wood lies on the margins of the transition, and that the proposed boundary follows clear features on the ground (predominately lanes) and is consistent with the definition of the Kent Downs National Landscape to the east.</p>

Boundary		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
		<p>Natural England Guidance is clear that land <i>‘should not be included merely to seek to protect it from specific development proposals.’</i></p> <p>In relation to the proposed solar farm to the east of Staffhurst Wood, Application 2022/1240 has been withdrawn and Application 2022/963 was refused in November 2023, it has therefore not been a material consideration in defining the extent of any boundary.</p> <p>Given the transitional nature of the landscape and recognition of the value of Staffhurst Wood, and in light of comments made by respondents, Natural England also considered what an alternative boundary would be like if Staffhurst Wood was to be included.</p> <p>The proposed boundary put forward by respondents also follows rural lanes, a small section of railway and a small section of County boundary along a Kent Brook. The western boundary is drawn along Red Lane and Dwelly Lane and therefore splits the areas of woodland, excluding ancient woodland and SNCIs to the west.</p> <p>Having reviewed the evidence, Natural England acknowledge that an alternative boundary could be drawn further to the south which would enable the features of interest such as the woodland of Staffhurst Wood to be included, whilst excluding tracts of lesser quality land. It also notes that the Surrey Landscape Character Assessment describes this area as being in better condition (appears more maintained) and with a slightly higher sense of tranquillity than other areas of Low Weald landscape to the west (Surrey Landscape Character Assessment: Tandridge District, Page 79).</p> <p>On balance Natural England considers that there is a case to extend the boundary further south thereby including Staffhurst Wood and higher quality undulating land to the west, whilst still excluding lesser quality land to the south of Monks Lane, where there is evidence of field boundary loss. Although this is a revised boundary on the margins of a transitional landscape, upon further review, Natural England considers the landscape qualities to remain sufficiently high due to the natural and cultural heritage features which overtly contribute to natural beauty.</p>



Boundary		
Theme	Representations	Natural England Commentary
		<p><b><u>Conclusion</u></b> Minor addition to include land to the south, including Staffhurst Wood.</p> <p>(Addition 12 – Refer to Figure 23b)</p> <p><b><u>Commentary</u></b></p> <p>Natural England is aware that planning application 23/00505/FUK for a solar farm was granted in January 2024. This development lies beyond Staffhurst Wood, east of Black Robin's Farm and Kent Brook and within Sevenoaks District Council. Natural England has reviewed the proposed boundary in light of this change and considers that it remains robust.</p> <p><b><u>Conclusion</u></b> No change.</p>
Support for proposed Addition 12: Land south of Staffhurst Wood	<p>192 respondents agreed with the designation of Addition 12, some providing reasons for their view as set out below. 2 went on to suggest an alternative boundary, bringing in more land:</p> <p><b>ANON-PQ5Q-KRHH-M (Tandridge District Council)</b> <i>'Tandridge District Council supports the inclusion of this area as defined in Figure..... 23b of the Second Consultation Documents. We agree with the conclusions made by Natural England (Appendix 15: Limpsfield Analysis Table) that the landscape qualities of this area remain sufficiently high due to the natural and cultural heritage features which overtly contribute to natural beauty.</i></p>	<p><b><u>Commentary</u></b></p> <p>Natural England acknowledges the reasons given by respondents in support for this addition.</p> <p>3 respondents disagreed with the designation of Addition 12 but provided no reason for their view.</p> <p>Respondent <b>ANON-PQ5Q-KR54-D</b> raised the issue of the description of the extent of the AONB if the Secretary of State confirms the Extension Areas and designation order. This is a matter for the Surrey Hills National Landscape Board.</p> <p><b><u>Conclusion</u></b></p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>We also fully support the view that the expanded AONB boundary should include Staffhurst Wood and other ancient woodlands that are of great importance to visitors and local residents.</i></p> <p><i>We agree with Natural England that the ancient woodlands are features within the wider landscape transition and exhibit natural heritage interests such as bluebells in spring and that this woodland is regarded as peaceful, tranquil and visually appealing. We wholeheartedly endorse this AONB boundary amendment.'</i></p> <p><b>ANON-PQ5Q-KR3B-S (Sevenoaks District Council)</b></p> <p><i>'...the extension at Limpsfield would result in the Surrey Hills AONB being contiguous with the Kent Downs AONB boundary, before extending slightly further south than the Kent Downs along the administrative boundary before moving further within Tandridge and to the south. This will have some bearing on our functions in so far as the setting of the Surrey Hills AONB and any impact on it, will need to be taken into consideration, however we recognise that anything in this locality would also likely have to take into account their impact on the Kent Downs AONB.</i></p> <p><i>As such, Sevenoaks District Council has no comments or objections to raise with respect to the proposed boundary variation where it abuts our district.'</i></p>	No change.

Boundary		
Theme	Representations	Natural England Commentary
	<p><b>ANON-PQ5Q-KRTV-E</b>  <i>'The Western boundary of area A12 that runs along Red Lane is the boundary between Oxted Parish Council and Limpsfield Parish Council.</i></p> <p><i>[Anon] fully supports the inclusion of this area as defined in Figures 12b and 23b of the Second Consultation Documents. We agree with the conclusions made by Natural England (Appendix 15: Limpsfield Analysis Table) that the landscape qualities of this area remain sufficiently high due to the natural and cultural heritage features which overtly contribute to natural beauty. We also fully support the view that the expanded AONB boundary should include Staffhurst Wood and other ancient woodlands that are of great importance to visitors and local residents.</i></p> <p><i>We agree with Natural England that the ancient woodlands are features within the wider landscape transition and exhibit natural heritage interests such as bluebells in spring and that this woodland is regarded as peaceful, tranquil and visually appealing. We wholeheartedly endorse this AONB boundary amendment.'</i></p> <p><b>ANON-PQ5Q-KRV4-E</b>  <i>'Staffhurst Wood is designated Ancient Woodland. This proposed addition would help protect this small woodland comprising 65 acres.'</i></p> <p><b>ANON-PQ5Q-KR48-G</b></p>	

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>'The proposed extension is a logical step encompassing Staffhurst Wood, an ancient woodland. It is a Site of Special Scientific Interest (SSSI) and home to a wide variety of flora and fauna, including several rare species. It also has great amenity value and [is] used by walkers and dog owners.'</i></p> <p><b>ANON-PQ5Q-KR4X-G</b>  <i>'I support the addition of .....the beautiful Staffhurst Wood and certainly merits inclusion in the SHNL [SH AONB].'</i></p> <p><b>ANON-PQ5Q-KR51-A</b>  <i>'Staffhurst Wood is I believe is already under the care of The Woodlands Trust therefore this addition makes perfect sense.'</i></p> <p><b>ANON-PQ5Q-KR52-B</b>  <i>'such a beautiful place - and brings so much pleasure to many people who visit throughout the year, but above all, is essential for the wildlife in the area.'</i></p> <p><b>ANON-PQ5Q-KR54-D</b>  <i>The proposed addition of the land south to Staffhurst Wood, will complement the existing and previously proposed AONB area in Limpsfield. The</i></p>	

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>proposed addition is both rural and tranquil and merits inclusion in the AONB.</i></p> <p><i>Recognising the significant increase in the AONB area within the parish, [Anon] would also suggest that on completion of the process the description for the Surrey Hills AONB be changed from "Farnham in the west to Oxted in the east" to "Farnham in the west to Limpsfield in the east".</i></p> <p><i>We feel that this description will more accurately reflect the changes to the AONB in Limpsfield and east Surrey.'</i></p> <p><b>ANON-PQ5Q-KR5C-V</b>  <i>'Beautiful peaceful rural area to visit, especially the unique sight of the bluebells of Staffhurst Wood. Any disturbance would threaten flora and fauna and ruin the place.'</i></p> <p><b>ANON-PQ5Q-KR5T-D</b>  <i>'Staffhurst Wood itself is a special area; particularly beautiful when the bluebells are out, when many people visit, from nearby and further afield. The adjacent farmland area, to the east and northeast, is attractive in it's own right and because of it's views north to the Greensand Ridge. It is also attractive and worthy of preservation when viewed south from the Greensand Ridge.'</i></p> <p><b>ANON-PQ5Q-KR9E-2</b></p>	

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>'This area is loved by so many of the local residents and has a special place in the community. As such I feel it should be protected for future generations.'</i></p> <p><b>ANON-PQ5Q-KR9E-2</b> <i>'Natural, largely unspoiled woodland, good natural diversity of habitat.'</i></p> <p><b>ANON-PQ5Q-KRAX-W</b> <i>'This tranquil and beautiful area allows scope for many walking routes and should be protected for us now and future generations to enjoy the physical and mental refreshment that the countryside can bring.'</i></p> <p><b>ANON-PQ5Q-KRHE-H</b> <i>'This is a very attractive woodland area (for which Surrey is famous) and is an obvious omission from the local AONB.'</i></p> <p><b>ANON-PQ5Q-KRJ6-4</b> <i>'Fully support the proposition to extend the AONB boundary which hugely contributes to the natural beauty of the area. Fully support that this area should be included as they are of great importance to visitors and local residents. The woodland features within the wider landscape, particularly in the Spring time with the growth of the beautiful</i></p>	

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>bluebells of which bring many peace, tranquility and an opportunity to get out into nature.'</i></p> <p><b>ANON-PQ5Q-KRJW-5</b>  <i>'This is a beautiful natural area of mixed heritage woodland and rolling fields that attracts walkers and nature lovers year round.'</i></p> <p><b>ANON-PQ5Q-KRN2-4</b>  <i>'Staffhurst wood is high value not just for its biodiversity, but also its ambiance and contribution to the natural beauty of the area.'</i></p> <p><b>ANON-PQ5Q-KRNR-4</b>  <i>'We agree with the proposal for this area to be included. It very much deserves to be designated ANOB [AONB]. The bluebells are stunning in spring, and generally a beautiful area.'</i></p> <p><b>ANON-PQ5Q-KRNS-5</b>  <i>'Staffhurst Wood is an area of beauty, woodland, special habitat and tranquility which is very important to local residents and others visiting the site and its surrounding countryside. It is a rare and ecologically important site and without a doubt should be included within the boundary review. I fully support its inclusion.'</i></p> <p><b>ANON-PQ5Q-KRPE-S</b></p>	

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>‘Staffhurst wood and the surrounding area are examples of the most beautiful unspoilt countryside. There are amazing walks at all times of year but especially amongst the bluebells in Spring. The extensive woodland provides a calm green space to enjoy and for nature to thrive.’</i></p> <p><b>ANON-PQ5Q-KRQE-T</b>  <i>‘This is an area of outstanding beauty bordered by ancient woodland and English, therefore native bluebells. It is chocca block with wildlife, fungi and birds and adds so much to our local area. Please keep it protected for the future generations.’</i></p> <p><b>ANON-PQ5Q-KRQM-2</b>  <i>‘The land makes sense as it was always an abutment to the AONB and to leave this small portion out does not make sense.’</i></p> <p><b>ANON-PQ5Q-KRQZ-F</b>  <i>‘The area is peaceful and a haven for flora and fauna. I suspect that - given the area’s years of undisturbed existence - biodiversity will be enormous. The area should therefore be given additional protection so as to preserve its special nature for generations.’</i></p> <p><b>ANON-PQ5Q-KRSB-S and ANON-PQ5Q-KRSJ-1</b></p>	



Boundary		
Theme	Representations	Natural England Commentary
	<p><i>'Protection against the erosion of the green spaces in this area are essential to preserve them for future generations.'</i></p> <p><b>ANON-PQ5Q-KRVN-8</b> <i>'Just too beautiful to be destroyed for ever by developments.'</i></p> <p><b>ANON-PQ5Q-KRWY-M</b> <i>'There is no doubt that this area is one of outstanding national beauty but then most of the local area is and could be protected. However if at some time in the future some development is allowed close by as it surely will be, then it will be even more important that these exceptionally attractive areas to view and visit will become very significant and important to our general well being.'</i></p> <p><b>ANON-PQ5Q-KRX1-D</b> <i>'this is an area of outstanding natural beauty with rural vistas, ancient wood and provides a wonderful area of clean air and scenery for individuals and families to explore and learn from.'</i></p> <p><b>ANON-PQ5Q-KRX7-K</b> <i>'It has been an incomprehensible anomaly that the East Surrey section of the beautiful Greensand Chart and its environs have not hitherto enjoyed</i></p>	

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>the same protection as for decades has been accorded to it in West Surrey.'</i></p> <p><b>ANON-PQ5Q-KRXV-J</b></p> <p><i>'Provides uninterrupted views across countryside of classical English nature; open air free from visual clutter and atmospheric and light pollution. Need to keep this area free to maintain the afore mentioned benefits.'</i></p>	
<p><b>Support Addition 12 but wish to see more land included and an alternative boundary</b></p>	<p><b>3 respondents agreed with the designation of Addition 12 and wished to comment on the boundary. As noted above, 2 respondents who simply agreed also suggested alternative boundaries giving a total of 5.</b></p> <p>A variety of additional areas and boundaries were suggested by respondents including:</p> <ul style="list-style-type: none"> <li>• Extend boundary up to the railway line in the south</li> <li>• Include Honesland Wood, Great Earls Wood, Little Earls Wood and Merle Common SNCIs and include land all the way to the High Weald</li> <li>• Include land west as far as Holland Road.</li> </ul> <p><b>Extend boundary up to the railway line in the south</b></p>	<p><u><b>Commentary</b></u></p> <p>Several respondents who requested the inclusion of more land, reiterated evidence previously submitted during the first (2023) statutory consultation.</p> <p>Natural England notes that there is no consensus regarding an alternative boundary put forward by respondents.</p> <p><b>Extend boundary up to the railway line in the south</b></p> <p>Pages 5 to 9 above set out the reasons why the boundary was extended southwards to include Staffhurst Wood. In summary, the issues which influenced the decision for Addition 12 and the proposed boundary included the transitional nature of the landscape away from the Greensand Ridge, the inclusion of a feature of national importance at the margins of the area (Staffhurst Wood SSSI) and the use of roads as a robust boundary within the transition. The use of the railway line as the boundary would require the inclusion of land beyond the SSSI, further to the south. Natural England considers the edge of woodland is a clear, robust boundary line and there is no necessity to extend further to the railway line.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><b>ANON-PQ5Q-KR44-C</b></p> <p><i>'I am pleased to see the extension to the south now includes the majority of Staffhurst Wood and its surrounds and that Natural England have now acknowledged that it meets the required criteria...</i></p> <p><i>....please don't miss out the last small section of Staffhurst Wood and Black Robins farm, it would be an inexcusable miss with no criteria or logic for doing so.</i></p> <p>Reasons given include:</p> <ul style="list-style-type: none"> <li>boundary along Grants and Monks lanes excludes the last SE section of Staffhurst Wood (the best section for the much loved and visited bluebells) and the iconic, listed wealden farm of Black Robins</li> <li>Black Robins Farm (land and house) have been traditionally farmed for generations and are a beautiful representation of Wealden farming set against the Staffhurst Wood backdrop.</li> </ul> <p><b>Proposed Boundary</b></p> <p><i>'The obvious ... boundary would be the railway lines to the south and east of this land. Beyond these two railway lines Natural England are correct that the nature of the land and how it is farmed changes but the current Monks lane boundary</i></p>	<p><b>Include Honesland Wood, Great Earls Wood, Little Earls's Wood and Mearle Common SNCIs</b></p> <p>In transitional landscapes, it is common for roads to be identified as the most robust boundary features. This may lead to land either side of the road appearing similar in character and quality, and/or the exclusion of other features of interest which lie immediately beyond. In this case, Natural England recognises there are features of interest which remain excluded, including ancient woodland at Great Earls Wood, Little Earls Wood, Merle Common and Honesland Wood, as well as SNCI woodland to the south. To the east there are listed buildings associated with Black Robins Farm as well as listed properties off Dwelly Lane.</p> <p>Natural England has reviewed the request for the inclusion of these features of interest on the margins and considered alternative boundary options. Nevertheless, Natural England notes that these features of interest are not unusual within the Low Weald landscape, and that their inclusion would either give rise to more complex boundaries or the inclusion of land at the margins of the transition from the Greensand Hills.</p> <p>On balance, Natural England favours a boundary that brings in the vast majority of the SSSI designation whilst also using lanes to form a robust boundary in this location.</p> <p><b>Include land as far as Holland Road</b></p> <p>Land further to the west as far as Holland Road lacks the qualities of Staffhurst Wood and the visual connection and variety associated with the Crooked River in the east. Land is falling in elevation westward and, whilst attractive Low Weald landscape, it lacks distinction. Furthermore, Natural England Guidance is clear that land should not be included merely to seek to protect it from specific development proposals.</p> <p>Natural England acknowledges that the definition of the boundary in this area has been finely balanced. Nevertheless, taking all factors into account, Natural England considers the proposed boundary of Addition 12 remains robust and appropriate given the specific set of issues in this area.</p> <p>Natural England supports Nature Recovery Strategies and the connectivity between habitats. These initiatives may operate inside and outside of AONBs and are not a factor which determines the extent of land which qualifies for designation. Although only</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>misses a jewel that is entirely consistent (if not better) than the land in the extension.'</i></p> <p><b>ANON-PQ5Q-KR4N-6</b></p> <p><i>'I am pleased to see, and agree that the land to the south of Staffhurst Wood is now included in the consultation and is part of the proposed extension of the AONB..... I believe the AONB should extend to the railway line to the south of Staffhurst Wood and then east to where it meets the Kent Brook and then up to where it meets Monks Lane.'</i></p> <p>Reasons given include:</p> <ul style="list-style-type: none"> <li>• view from the top of the little railway bridge on Grants Lane is really beautiful as it takes in views all the way up to the Greensand Ridge</li> <li>• Grade 2 listed Black Robins Farm</li> <li>• open view of undulating low weald up to Limpsfield Chart takes into account Crooked River and Kent Brook and the natural way it meanders through the countryside</li> <li>• habitats support voles and kingfishers.</li> </ul> <p><b>Include Honesland Wood, Great Earls Wood, Little Earls Wood and Merle Common SNCIs</b></p> <p><b>ANON-PQ5Q-KR4A-S</b></p>	<p>part of the area is proposed for designation, this will not prevent the movement of species and habitat connections between areas. Similarly, the designation of one area does not prevent the AONB Partnership from working beyond its boundaries to achieve nature recovery.</p> <p><b><u>Conclusion</u></b></p> <p>No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>‘ANON strongly supports the inclusion of Staffhurst Wood in the extended AONB... We also strongly believe, however, that the proposed new boundary is too restrictively drawn and should be expanded to encompass the adjacent Honesland Wood, Great Earls Wood, Little Earls Wood and Merle Common, all of which are SNCIs.’</i></p> <p>Reasons given include:</p> <ul style="list-style-type: none"> <li>• Appendix 15 recognises their value by twice appreciatively mentioning the other ancient woodlands associated with Staffhurst Wood. It gives no rationale for their exclusion.</li> </ul> <p><i>‘We also think that the new boundary of the AONB should be extended southwards to meet the High Weald AONB, taking in the River Eden Biodiversity Opportunity Area, which Appendix 15 recognises to be one of the “most important areas for wildlife consultation remaining in Surrey” . That would be consistent with the recommendations of the Glover and Lawton review, as we argued in our previous submissions to this exercise. We are disappointed that our arguments have not been adequately addressed either here or in appendices 2 and 16.’</i></p> <p><b>ANON-PQ5Q-KRC2-S</b></p> <p><i>‘Very appropriate to include this piece of land. However the field on the opposite side of the road that runs from The Hollies to Merle Common should also be included.’</i></p>	

Boundary		
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	<p><b>Include land west as far as Holland Road</b></p> <p><b>ANON-PQ5Q-KRC8-Y</b>  <i>'Within the past twenty seven years that we have lived in Hurst Green, a lot of houses have been built within the area which finishes at the end of Holland Road. It would be useful to protect land from there to the end of Staffhurst Wood.'</i></p>	
<p><b>Inclusion of land south of the railway including as far as the River Eden and High Weald</b></p>	<p><b>ANON-VUXE-WEBR-R, ANON-VUXE-W5MG-8, ANON-VUXE-WS1P-K, ANON-VUXE-WS1N-H, ANON-VUXE-WEJ4-2</b> requested the inclusion of land as far as the High Weald National Landscape (AONB).</p> <p>Similar submissions were also made in relation the proposed extension of Godstone (refer to Appendix 16).</p> <p>Many framed their arguments in relation to the opportunity to forge a connection to the High Weald and made reference to:</p> <ul style="list-style-type: none"> <li>• Surrey Biodiversity Opportunity area of the River Edem and tributaries</li> <li>• 2019 Glover Review – national landscapes should be the backbone of nature recovery – joining things up within and beyond their boundaries.</li> </ul>	<p><b><u>Commentary</u></b></p> <p>Arguments which have been put forward in relation to opportunities for nature recovery have been considered under desirability which can be found in Appendix 2.</p> <p><b><u>Inclusion of the River Eden Biodiversity Opportunity Area (BOA)</u></b>  This area has been identified by Surrey Nature Partnership (Sept 2019) along within other river catchments in Surrey. The River Eden area extends from Limpsfield in the north to south east of Outwood and along the northern fringes of the High Weald AONB. It focuses on the watercourse corridors of the Eden and its main tributaries. BOAs identify the most important areas for wildlife conservation remaining in Surrey. The aim of Biodiversity Opportunity Areas (BOAs) is to establish a strategic framework for conserving and enhancing biodiversity at a landscape scale, making our wildlife more robust to changing climate and socio-economic pressures. Natural England notes that whilst this area indicates nature conservation interest and opportunities for enhancement, it does not equate to a wider tract of land which has natural beauty. Natural England Guidance is clear that natural heritage must contribute to an appreciation of the natural beauty of the landscape. Natural England therefore does not consider the presence of the River Eden BOA as a justification for including this part of the Low Weald within the proposed boundary extension. Furthermore, the assessment</p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> <li>2010 Lawton Review – bigger, better and more joined up.</li> </ul> <p>Respondents also gave reasons why the area is considered to meet the natural beauty criterion.</p> <p><b>Natural Beauty</b></p> <ul style="list-style-type: none"> <li>Gently undulating farmland</li> <li>High concentrations of important wildlife habitats</li> <li>Well maintained landscape</li> <li>Quiet country lanes</li> <li>Sparce settlement</li> <li>Views from elevated points to the North Downs and High Weald</li> <li>Staffhurst Wood SSSI (ancient bluebell woodland)</li> <li>Peacefulness</li> <li>Dark night skies</li> <li>Old farmhouses and listed buildings</li> <li>Small brooks feeding the River Eden</li> <li>Ancient bluebell woodland</li> <li>Diverse wildlife</li> <li>Benefits set out in Surrey County Landscape Character Assessment have been ignored</li> </ul> <p><b>Desirability</b></p> <p>Respondents cited the need to fulfil Government's National Policy on 'joining up' protected areas, and enriching wildlife value.</p>	<p>of natural beauty is based on the current condition of the landscape not on future potential (para 6.10 last bullet of Natural England Guidance).</p> <p>The issues identified in the Natural Beauty Assessment were not the absence of landscape features but rather that this landscape, although attractive, lacked the qualities that made it nationally outstanding. The Natural Beauty Assessment Report noted the transitional nature of the landscape south of the greensand hills. The lower lying nature of this landscape and its well wooded character means that much of it lacks visual connectivity to the greensand hills to the north or chalk scarp, within the existing AONB beyond. Natural England Guidance on defining boundaries notes that where there is a transition in natural beauty the boundary should be drawn towards the high-quality end of the transition. It goes on to state that '<i>Visual associations may also be used to help define the extent of land for inclusion in these circumstances.</i>'</p> <p>Natural England notes that concerns are raised regarding perceived lack of consideration of evidence contained within the Surrey County Landscape Character Assessment. This area is classified as part of the Low Weald Farmland landscape type and an extensive area of low weald farmland called Horley to Swaynesland Low Weald Farmland. The assessment highlights that the area is defined by the change in the underlying geology to the north from clays to greensand. Boundaries between character areas are recognised as not hard and fast boundaries but reflect gradual changes in character.</p> <p>The proposed boundary takes account of changes in character and quality of the landscape. The natural beauty assessment makes it clear that the south side of the greensand ridge is in transition and that the defining qualities of the greensand ridge become less pronounced moving south.</p> <p>Natural England has reviewed this area following consultation responses and has concluded that the area comprises attractive and generally unspoilt tranquil countryside with few landscape detractors. This is not unusual in the Low Weald.</p> <p>Natural England considers that the judgement to exclude the wider area and to not extend further south than Staffhurst Wood (as noted above) is sound. The wider</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><b>ANON-VUXE-WEJ4-2</b>  <i>'I believe to ensure species biodiversity long-term we should create an uninterrupted AONB that extends to the High Weald.'</i></p> <p><b>ANON-VUXE-WES8-F</b>  <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></p> <p><b>ANON-VUXE-W5MG-8</b>  <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.'</i></p> <p><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></p> <p><b>Boundary</b></p>	<p>swathe of Low Weald landscape between the railway and High Weald AONB, whilst including attractive countryside, is not of national significance. Furthermore, south of the railway the visual links of this area to the Surrey Hills are not strong, with views focusing more to the south and the High Weald National Landscape or to the east to the Kent Downs National Landscape.</p> <p>This wider area, south of the greensand hidge is not strongly associated with the core areas of the Surrey Hills. Natural England agrees with respondents who note that <i>'the area running south to the Eden Brook and the boundary of the High Weald AONB is not as visually spectacular as much of the landscape to the north'</i> (<b>ANON-VUXE-WEBG-D</b>). The fact that this landscape has not been identified as AGLV (local landscape designation) in the past, strengthens this view.</p> <p>AONBs seek to implement strategies related to nature recovery within and beyond their boundaries. When working beyond their boundaries they are able to support initiatives which will have a direct benefit on the natural beauty of the designated AONB in accordance with the purpose of designation. The Surrey Hills AONB along with the Kent Downs and High Weald National Landscapes have opportunities to work within the area south of the railway to further nature conservation objectives, even though this land itself may not be designated.</p> <p><b>Conclusion</b>  No change.</p>



<b>Boundary</b>		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	Eastern boundary to follow the Tandridge Border path – Country boundary and southern boundary to Eden Brook and Ray Brook.	