

## Appendix 17: Betchworth Hills and Mole Valley

Please refer to Figure 25b

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

### Overview

Question C1: Does the Betchworth Hills and Mole Valley Extension Area have Sufficient Natural Beauty to be Designated as AONB?

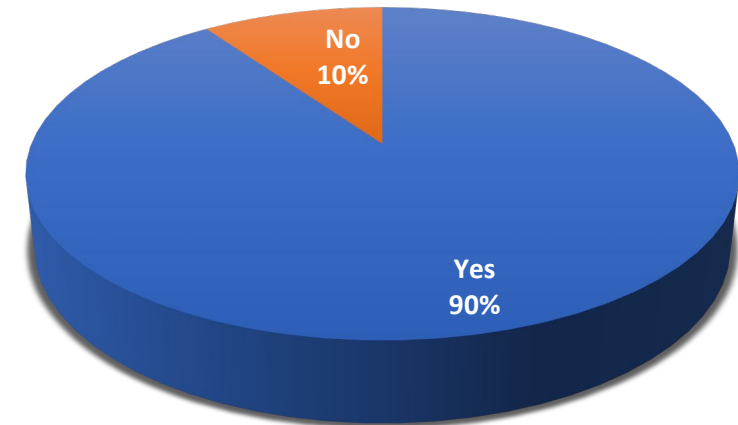
Natural Beauty	Responses
Yes	37
No	4
Not sure	0

Of the 41 respondents who answered question C1, 37 respondents (90%) felt that this area has sufficient natural beauty to be designated as AONB.

In contrast 4 respondents (10%) felt that the Betchworth Hills and Mole Valley does not have sufficient natural beauty to be designated as AONB.

Desirability reasons for including and excluding land within the proposed extension focused on the threat of development or related to an objection to designation in principle. These issues are addressed in Appendix 2.

Betchworth Hills and Mole Valley - Sufficient natural beauty to be designated



Question C5: Do you agree with the proposed boundary for the Betchworth Hills and Mole Valley Extension Area?

Boundary	Responses
Yes	17
Yes, but I wish to suggest an alternative	19
No	2
Not sure	2

Of the 40 respondents who answered question C5, 17 respondents (42%) agreed with the proposed boundary for the Betchworth Hills and Mole Valley Extension Area and 2 respondents (5%) did not.

19 respondents (48%) agreed but wished to suggest an alternative boundary, many providing supporting evidence.

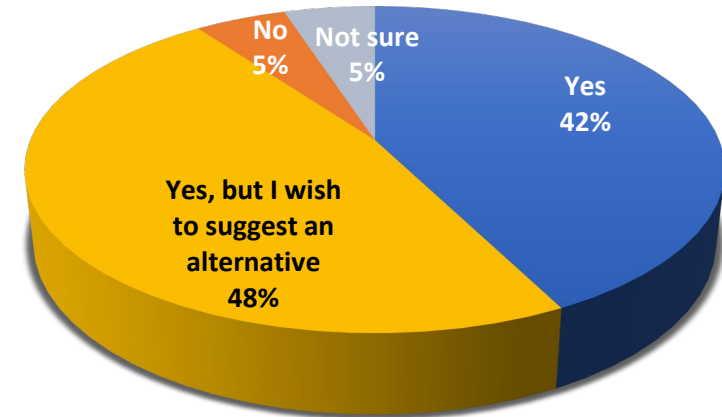
Respondents sought alternative boundaries in a number of different areas and for a range of reasons.

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

- Land east of Clifton's Lane to Pilgrim's Way (including fields east of Clifton's Way)
- Land north of the A25 and west of Clifton's Lane, including Tapwood Lake and Lawrence Lake and woodland south of the railway
- Whole of Buckland Park Lake curtilage
- Land south of the A25 and Shagbrook
- Land between Skimmington and Park Lane, inc Littleton Lane
- Land south of Littleton Lane to Clayhall Lane
- Land north of Old Reigate Road, NW of Betchworth
- Land west of Brockham
- Include land south of Inholm's Lane and land west of A23 at Glory Woods SNCI

There were no requested exclusions.

Betchworth Hills and Mole Valley - Agreement with the proposed boundary



During the second (2024) statutory consultation, responses were received regarding **Addition 15: Land at Colley Hil** and **Addition 16: Land at Shag Brook**. Natural England has reviewed these responses and provided further commentary in blue below.

Additional responses were also received relating to **land at Reigate Park and Littleton Lane**. Natural England has reviewed this area and provided further commentary in blue, on page 17 below.

Natural Beauty		
Theme	Representations	Natural England Commentary
The proposed extension meets the Natural Beauty Criterion	<p><b>ANON-VUXE-WEZ7-N (Mole Valley District Council)</b>  <i>'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><b>ANON-VUXE-WEV4-E (Reigate &amp; Banstead Borough Council)</b>  <i>'We note the proposed inclusion of the Reigate Heath as part of this addition which the council strongly supports.'</i></p> <p><b>ANON-VUXE-WM3K-A</b>  <i>'The backdrop of the scarp slope of the North Downs is a constant feature, whatever the vantage point within this area. This enhances its scenic quality.'</i></p> <p><b>ANON-VUXE-W5FD-X</b>  <i>'[Anon] supports the assessment of the land being put forward for inclusion within the extended boundaries of the Surrey Hills AONB and agrees with the views expressed by Natural England with respect to natural beauty.'</i></p> <p><b>ANON-VUXE-W5CD-U</b>  <i>'I agree with the views expressed by Natural England with respect to Natural Beauty and support the assessment of the land being proposed for inclusion within the extended boundaries.'</i></p>	<p><b>Commentary</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> <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		
Theme	Representations	Natural England Commentary
	<p><b>ANON-VUXE-W5CF-W</b>  <i>'I broadly agree with the views being expressed by Natural England with respect to Natural Beauty and support the assessment of the land that is being proposed for inclusion within the extended boundaries.'</i></p> <p><b>ANON-VUXE-W5YY-6</b>  <i>'Buckland and Betchworth are beautiful traditional villages, both protected over several hundred years from excessive development due the majority of the land area being owned by families with the inherited wealth of the Estate Assets. Your reports highlight some of the positive features, and I fully support their inclusion in the AONB extension.'</i></p> <p><b>ANON-VUXE-W5YY-6</b>  <i>'This is a stunning landscape between Buckland and Betchworth. The views to the North Downs, across and along the River Mole are breathtaking. It's also very peaceful and should remain this way.'</i></p> <p><b>ANON-VUXE-WSQ4-Q</b>  <i>'The landscape around Buckland and Betchworth is of the highest quality. The views of the North Downs, the views across the River Mole are breath taking. Softer than the Lake District or the Derbyshire Dales but appeal to my senses as much. Walking through this landscape is joyously tranquil.'</i></p> <p><b>ANON-VUXE-W5M9-T</b>  <i>'The area includes Reigate Heath which is SSSI and unique to East Surrey. Acid heathland is a declining habitat in Britain.... It is the uniqueness of the habitat that</i></p>	

Natural Beauty		
Theme	Representations	Natural England Commentary
	<p><i>give it a natural beauty not experienced elsewhere in the region of Surrey.'</i></p> <p><b>ANON-VUXE-WM5D-5</b>  <i>'Nothing beats the view north towards to the North Downs, and the view across the River Mole to the parklands of the Betchworth Estate are wonderful.'</i></p> <p><b>ANON-VUXE-WM56-Q</b>  <i>'The topography of farmland and River Mole has great beauty at this point, to which the higher ground of the proposed extension is complementary.'</i></p>	
<b>The proposed extension does not meet the Natural Beauty Criterion</b>	<p><b>ANON-VUXE-WM4D-4</b>  <i>'to have Natural Beauty you would have to control Noise. You don't control noise by allowing the Bikers to treat the roads as a race track and sound testing station. Stop the Bike noise - then it would be beautiful.'</i></p> <p><b>Respondent ANON-VUXE-WMMB-U</b> considered that the area EA11c should not be designated AONB concluding:</p> <p><i>'The Natural Beauty Assessment presents only a weak case for extending AONB status to sub-area 11c and my points above make the argument for doing so even weaker.'</i></p>	<p><b>Commentary</b></p> <p>Natural England agrees that the intrusion of noise can undermine perceptions of natural beauty and has been mindful of this in its assessment of natural beauty in the context of the Surrey Hills landscape. Natural England takes into account all aspects of natural beauty in reaching judgements and has concluded that the proposed Extension Area meets the criterion of natural beauty overall.</p> <p>Natural England agrees – the area of E11c was not proposed for inclusion in the Candidate Area following the Natural Beauty Assessment and the proposed boundary has been drawn to the east of Brockham.</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-W57U-Z</b></p> <p><i>‘Yes I do for the most part – having read the reports about the built up nature of other parts of Reigate in particular, I understand the reasons why the specific areas have been selected. I sincerely hope that all of the boundary extension proposals are accepted.’</i></p> <p><b>ANON-VUXE-WMUY-T</b></p> <p><i>‘It recognises there are many types of beauty, lower land as well as hills.’</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		
Land east of Clifton’s Lane to Pilgrim’s Way (including fields east of Clifton’s Way and north of the A25)	<p><b>ANON-VUXE-WEUQ-A, ANON-VUXE-WSRT-R, ANON-VUXE-WEPD-R, ANON-VUXE-W5CF-W and ANON-VUXE-WSR1-N, ANON-VUXE-W57U-Z, ANON-VUXE-WEC5-V</b></p> <p>Although each of the respondents put forward different boundaries, the arguments which are advanced are similar and are summarised below:</p> <p><b>Natural Beauty</b></p> <ul style="list-style-type: none"> <li>• Open fields which allow wide ranging views to Colley Hill.</li> <li>• Beautiful landscape.</li> <li>• Enjoyed by walkers and cyclists.</li> </ul>	<p><b>Commentary</b></p> <p><b>Natural Beauty</b></p> <p>This area was considered in detail during the natural beauty assessment and was found to have become fragmented by residential development and urban fringe land uses including the rugby club pitches.</p> <p>This area has been reviewed in light of the representations received. Natural England agrees that the land immediate to the south of the chalk scarp often affords spectacular views of the scarp and rising land. A view alone is not sufficient to justify the inclusion of land within the AONB, the land itself needs to express natural beauty and to form part of a wider tract of qualifying land. Nevertheless, Natural England agrees that views to dramatic topography can lift scenic qualities.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> <li>Management of fields at Clears Farm as wild flower meadows.</li> <li>Equal beauty to the fields to the west.</li> <li>Topography is critical – gentle incline to the hill.</li> </ul> <p><b>Desirability</b></p> <ul style="list-style-type: none"> <li>Part of the setting and buffer zone to Colley Hill.</li> <li>Area is under threat from development and requires protection.</li> </ul> <p><b>Boundary</b> Each respondent put forward a different alternative boundary ranging from the addition of a couple of fields to the east of the proposed boundary to extending the boundary to Colley Lane or Pilgrim's Way.</p> <p>In addition, respondent <b>ANON-VUXE-W5CF-W</b> requested a small extension to include woodland south of the railway and east of Clifton's Lane.</p>	<p>Natural England agrees that open pasture fields in this area form part of a sweep of uninterrupted downland forming the lower slopes of the chalk scarp. There is a strong sense of arrival on leaving built development and starting to climb the scarp. There are views east and west where the scenic composition and drama of the steep scarp slopes is readily apparent, although the open fields in the east have been partially affected by equestrian uses.</p> <p>The pattern of development within the area was a key reason why this area was not included within the proposed AONB extension. This has been reviewed. It is acknowledged that the development along The Clears includes a series of historic white cottages (Clears Cottages) as well as isolated historic farm buildings (Clears Farm) and farm/country houses e.g. Broadlees and Clears. These built elements contribute to scenic quality and sense of place. More recent infill development has occurred to the south of The Clears and also along Colley Way, although the latter sits down within the folds of the landscape, and given the well treed gardens, only isolated dwellings are visible in wider views. On balance therefore Natural England considers that the majority of this area does have sufficient natural beauty to be included within the boundary extension. Natural England has also reviewed this area in the context of other similar situations at the foot of the scarp foot slopes e.g. land west of Dorking, and has sought to ensure a consistent approach to designating land and defining boundaries.</p> <p><b>Desirability</b></p> <p>The process of evaluating landscape for designation does not take account of the role of a landscape in terms of providing a setting. Natural beauty is determined by consideration of the natural beauty factors set out in Natural England Guidance. Similarly, Natural England Guidance is clear that land is not included within a designation merely to seek to protect it from specific development proposals.</p> <p>These issues are addressed more fully in Appendix 2.</p> <p><b>Boundary</b></p> <p>Consideration was given to defining a boundary which includes the open fields around Clears and Broadlees but excludes the main areas of development of Clears Cottages and Colley Way. This would result in a convoluted boundary and would</p>

Boundary		
Theme	Representations	Natural England Commentary
		<p>exclude development which overall has little impact on the natural beauty of the open slopes. On balance, therefore, a decision was made to extend the boundary to include the wider area and dispersed development.</p> <p>The boundary enables the lower slopes of the scarp to be included whilst still excluding more recent development and the rugby sport pitch on lower lying land. The ancient woodland and SNCI of Colley Copse was considered to contribute to the rural character of Coppice Lane and The Clears and was also included. Colley Wood was considered to be more peripheral with development on two sides and its northern edge formed a clear boundary to the sweep of qualifying land. On this basis Colley Wood was not included. The woodland south of the railway and east of Clifton's Lane has not been included as it sits remotely from the area of qualifying land.</p> <p><b>Conclusion</b></p> <p>Minor addition to enable the lower slopes of the chalk scarp to be included, consistent with other existing land at the foot of the scarp which is included within the AONB.</p> <p>(Addition 15 – Refer to Figure 25b)</p>
<p><b>Support for proposed Addition 15: Land south of Colley Hill</b></p>	<p><b>59 respondents agreed with the designation of Addition 15 some providing reasons for their view as follows:</b></p> <p><b>ANON-PQ5Q-KRRC-S (Mole Valley District Council)</b></p> <p><i>'Yes, the Council agrees that this should be designated as part of the Surrey Hills National Landscape [AONB].</i></p> <p><i>While this area does not fall within Mole Valley, it is adjacent to the border and its inclusion both strengthens and reflects the high-quality landscape of the wider area. It is considered that the methodology has been applied correctly and is consistent with other</i></p>	<p><b>Commentary</b></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 15 but provided no reason for their view.</p> <p>2 respondents wished to comment on the boundary, however one referred to a different area and the second did not provide a comment. Natural England notes therefore, that there are no responses seeking a change to the boundary in this area.</p> <p><b>Conclusion</b></p>



Boundary		
Theme	Representations	Natural England Commentary
	<p><i>areas. The Council welcomes the addition of the Land South of Colley Hill as shown on Map 25b, reference A15.'</i></p> <p><b>ANON-PQ5Q-KR3K-2 (Reigate and Banstead Borough Council)</b>  <i>'...we note that some small further additions have been proposed for inclusion in the revised boundary that are located in Reigate &amp; Banstead which we would welcome.'</i></p> <p><b>ANON-PQ5Q-KR8F-2</b>  <i>'The land matches the criteria of outstanding beauty in its own right. It forms a beautiful sweeping vista towards the North Downs from the Greensand Way at the junction of Coppice Lane and Broadleas. This is important because it marks the boundary at which one leaves the more urban element of NW Reigate next to the designated ancient woodland that is include in the proposed addition.</i>  <i>It is also part of the important immediate green vista of Colley Hill and Saddle Knob.</i>  <i>The built environment includes the historic frontages of the 14 hearthstone mining company cottages in The Clears.</i>  <i>It is a landscape and habitat that deserves the additional layer of protection that designation would provide.'</i></p>	No change.

<b>Boundary</b>		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
<b>Whole of Buckland Park Lake curtilage</b>	<p><b>ANON-VUXE-W5CD-U and ANON-VUXE-W5YY-6</b> The reasons given for this minor boundary change include:</p> <ul style="list-style-type: none"> <li>• Clear fenced boundary to Buckland Park Lake along its eastern side.</li> <li>• Eliminate the anomaly of one side of the watercourse being judged "in" and the other "out" when they are effectively as desirable as each other.'</li> <li>• Current boundary along the brook takes no account of land use, land ownership and other designations.</li> <li>• Buckland Park Lake and its' surrounding woodland is now open to public access for members and paying visitors....boundary proposal excludes a small part of this land open to the public, which is of equal merit (ie the same woodland) and which is currently managed in the same way by the same owner.</li> <li>• Excluding it from the AONB, it may encourage it's over-development in future, as it would be outside any development protections offered by the AONB.</li> </ul>	<p><b><u>Commentary</u></b></p> <p>Natural England has reviewed the boundary in this area. The area of ancient woodland forms a small area in the north which has been extended by more recent plantation woodland. It is accepted that by following the watercourse half of the woodland has been excluded. Land ownership is not a consideration when defining a boundary and has not been taken into account. However, Natural England accepts that an alternative boundary can be drawn around the outside of more recent woodland so that all woodland flanking the brook (including the ancient woodland) is included.</p> <p><b><u>Conclusion</u></b> Minor addition to include all woodland east of Shag Brook.</p> <p>(Addition 16 – Refer to Figure 25b)</p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> <li>Boundary .... dissects ... wood which has a long-standing Ancient semi-natural woodland (ASNW) designation.</li> </ul>	
<b>Support for proposed Addition 16: Land west of Shag Brook</b>	<p><b>55 respondents agreed with the designation of Addition 16, although none provided a reason for their view.</b></p> <p><b>Respondent ANON-PQ5Q-KRRC-S (Mole Valley District Council)</b> commented on error in the previous analysis stating:</p> <p><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 small addition of the Land east of Shagbrook [Shag Brook] as shown on Map 25b, reference A16, but would suggest that this is not accurately named as it is instead west of Shagbrook [Shag Brook] and should be amended accordingly.’</i></p>	<p><b><u>Commentary</u></b></p> <p>Natural England acknowledges the support for this addition.</p> <p>Natural England agrees with the renaming of this area as west of Shag Brook and has made amendments to the text accordingly.</p> <p>2 respondents disagreed with the designation of Addition 16 but provided no reason for their view.</p> <p>3 respondents wished to comment on the boundary, however, one sought to correct a typo, the second referred to a different area and the third did not provide a comment. Natural England note therefore, that there are no responses seeking a change to the boundary in this area.</p> <p><b><u>Conclusion</u></b></p> <p>No change.</p>

<b>Boundary</b>		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
<b>Land south of the A25 and Shagbrook</b>	<p><b>ANON-VUXE-WEZ7-N (Mole Valley District Council), ANON-VUXE-WEEE-E and ANON-VUXE-W5YY-6</b></p> <p>The reasons given for the inclusion of this additional land include:</p> <p><b>Natural Beauty</b></p> <ul style="list-style-type: none"> <li>• Possess sufficient qualities for inclusion.</li> <li>• Flatter land with views to the south.</li> <li>• South of the A25, housing and commercial enterprises the land comprises open fields.</li> <li>• Shagbrook Stream on the west and leads back onto the Reigate Heath a SSSI.</li> <li>• Well protected by trees and is a popular walk for locals and visitors to the area.</li> <li>• Development on northwest edge of Reigate Heath is sporadic and low density.</li> <li>• Existing AGLV retained high quality landscape, indistinguishable from wider areas.</li> <li>• No past or current mineral extraction.</li> <li>• Tranquillity is the same as other areas proposed for inclusion.</li> </ul> <p><b>Desirability</b></p> <ul style="list-style-type: none"> <li>• Land lies between two areas of nature conservation value – inclusion of this land will enable them to function better.</li> <li>• Sits within a wider area of landscape of high quality.</li> </ul>	<p><b>Commentary</b></p> <p>Natural England agrees that this area of land forms a relatively flat area which slopes gently towards the Shag Brook to the south. It comprises a couple of relatively large fields between areas of plantation woodland on the edge of Reigate Heath and on the margins of the Buckland Park Lake. Land use is rough grassland and arable and there is evidence of some boundary loss. Properties are located along the northern edge and to the east. There are some limited views to the chalk scarp mainly in the southern part of the area.</p> <p>The inclusion of this area within the AGLV does not automatically mean it has sufficient natural beauty for inclusion within the Surrey Hills AONB and although it is an area which has not experienced past minerals extraction activity, it nonetheless lacks special qualities that distinguish it from wider countryside. Furthermore, it is experienced separately to the natural beauty of the surrounding qualifying areas to the south and sits at the margins of qualifying land. On balance it is not considered suitable for inclusion with the proposed AONB designation and the current proposed boundary is considered to be robust, including ancient woodland and wetland habitats (SNCI) and beyond, the heath habitats associated with the underlying greensand geology. Natural England disagrees that the landscape south of the A25 is indistinguishable from wider qualifying areas.</p> <p><b>Desirability</b></p> <p>Land is not considered desirable to designate because of the way it will function or be better managed. For land to be considered desirable to designate it must first meet the Natural Beauty Criterion. Given that the area is not considered to qualify in terms of its natural beauty, Natural England has not considered it in terms of desirability.</p> <p><b>Boundary</b></p> <p>The proposed alternative boundary would require the inclusion of land which is not regarded as meeting the Natural Beauty Criterion. Natural England considers that the current proposed boundary actually reflects the natural beauty of the landscape and is more robust.</p>

<b>Boundary</b>		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<ul style="list-style-type: none"> <li>Including this swathe of land enables the AONB to flow better and be justifiably continuous.</li> <li>Enables better management and protection of the setting of the AONB.</li> </ul> <p><b>Boundary</b></p> <ul style="list-style-type: none"> <li>Boundary would move east around the wooded boundary of the Pheasant at Buckland and its car park, following the hedgerow and established property boundary behind Windmill View/Bicknell Interiors, north of the agricultural field.</li> <li>While there can be more permanent features to use for the purposes of boundary setting, Public Rights of Way (PRoW), in this instance, can be used for the wider integrity of a stronger AONB extension.</li> </ul>	<p><b><u>Conclusion</u></b> No change.</p>
Land north of the A25 and west of Clifton's Lane, including Tapwood Lake and Lawrence Lake and woodland south of the railway	<p><b>ANON-VUXE-W5CF-W, ANON-VUXE-W5CD-U and ANON-VUXE-W5YY-6</b></p> <p>The reasons advanced for the inclusion of this area centred around the past extraction and restoration of the Tapwood and Lawrence Lakes following minerals extraction and the desire to include the whole of Buckland Parish.</p> <p><b>Reasons included:</b></p> <ul style="list-style-type: none"> <li>Restoration plans conditioned as part of the permission for the historic sand extraction</li> </ul>	<p><b><u>Commentary</u></b></p> <p>The landscape between the railway line and A25 has been reviewed in response to comments made by respondents. This landscape has a relatively unestablished character reflecting its former use as a landfill site (1940's) and the ongoing restoration of the Tapwood and Lawrence quarries which now form areas of open water and new woodland planting. Although the areas of open water are not visible in the landscape, the relatively recent woodland planting coupled with the railway line, overhead wires, as well as loss and alteration of field boundaries due to past land management, mean that this area lacks the qualities of more established and undisturbed land further to the west. Whilst the lake areas themselves have a nature conservation value, they are not considered to make an overt contribution to the natural beauty of the wider area and their wider context is poor. Overall, this area is not considered to express sufficient natural beauty to qualify as part of the Surrey</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p>were approved on the basis the land has remained green belt.</p> <ul style="list-style-type: none"> <li>• [don't] exclude any land in Buckland on the basis of possible future extraction as it is not going to happen.</li> <li>• Undue influence of the potential mineral working zone.</li> <li>• The processing capability has been removed and the landowner is committed to safeguarding the natural landscape.</li> <li>• Tapwood Quarry transfer into aftercare is imminent.</li> <li>• The uniqueness of the lakes in Buckland has been underestimated.</li> <li>• Largest areas of open water in Surrey when taken with Buckland Park Lake.</li> <li>• Tapwood and Lawrence are naturalised and surrounded by woodland and used for fishing.</li> <li>• Importance for wildlife including lake and margin habitats.</li> <li>• Sand extraction was completed in 2014, infrastructure was removed 2016.</li> <li>• Landscape compares favourably with land already in the AONB.</li> <li>• The land is Green Belt.</li> <li>• Inclusion of businesses along the A25 beneficial and consistent with other businesses in the AONB.</li> </ul> <p><b>Desirability</b></p>	<p>Hills AONB boundary extension and the proposed boundary along Lawrence Lane is considered robust.</p> <p>The exclusion of this area has been based on its current natural beauty. It is acknowledged that the landscape is establishing post restoration but is not considered likely to be of sufficient natural beauty within the short term (Natural England Guidance para 6.10). The decision to exclude this land is not based on its inclusion within a potential mineral working zone as defined in the Surrey Minerals Plan.</p> <p>Furthermore, the small-scale industries and businesses along the A25 immediately to the south of this area do not qualify for designation as AONB.</p> <p>Natural England does not consider that there is an inconsistency in reaching the decision to exclude all of this area and the decision to include Buckland Park Lakes to the south of the A25. Furthermore, Natural England does not consider there is an inaccuracy between the conclusions of the Natural Beauty Assessment Report and the Boundary Considerations Report. These assessments highlighted that the decision to exclude Buckland Park Lake from the Candidate Area was finely balanced (page 169) and went on to highlight the need for scrutiny at the boundary setting stage (page 173). At the boundary assessment stage detailed consideration was given to the inclusion of Buckland Park Lake. The location of the site adjacent to qualifying land to the north, west and south led to the conclusion that a less convoluted boundary could be defined resulting in the inclusion of the lake as part of a tract of qualifying land (page 47).</p> <p>Parishes are not a consideration in defining the boundary. Natural England Guidance set out under boundary considerations (Appendix 4) in relation to Integrity of Settlements that '<i>A settlement does not equate to a parish and the division of parishes is acceptable in drawing a boundary.</i>'</p> <p><b>Conclusion</b> No change.</p>

Boundary		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<ul style="list-style-type: none"> <li>• All lakes are under single management and designation would restrict commercialisation and protect nature.</li> <li>• Inclusion of Tapwood Quarry is desirable as adjoining land and to ensure consistency with inclusion of Park Lake.</li> </ul> <p>Respondent <b>ANON-VUXE-W5YY-6</b> raised concerns regarding the accuracy of the Natural Beauty Assessment. The reasons given include:</p> <ul style="list-style-type: none"> <li>• the Natural Beauty Assessment excluded Buckland Park Lake even though it is included within the boundary.</li> <li>• there are views to the chalk escarpment from within the Buckland Lake Park from the open water and southern access routes.</li> <li>• the use of the site does not create an urban fringe character.</li> </ul> <p>Respondent <b>ANON-VUXE-W5CF-W</b> requested a change in the boundary to include woodland south of the railway and the remaining land in the Parish of Buckland stating:</p> <p><i>‘This proposed amendment will include the small section of land which I consider meets the criteria to the immediate south of the railway line and eliminates what appears to me to be an adverse administrative judgement on the remaining land within the parish.’</i></p>	

Boundary		
Theme	Representations	Natural England Commentary
Land between Skimmington and Park Lane, inc Littleton Lane.	<p><b>ANON-VUXE-WEV4-E (Reigate &amp; Banstead Borough Council), ANON-VUXE-WEEV-Y and ANON-VUXE-WM3K-A</b></p> <p>A summary of the reasons given for the inclusion of this additional land is provided below:</p> <p><b>Natural Beauty</b></p> <ul style="list-style-type: none"> <li>Underlying geology is greensand and topography is undulating.</li> <li>Sunken, distinctive, atmospheric character of Park Lane.</li> <li>Park Lane is a Regionally Important Geological Site.</li> <li>Exposed tree roots and bluebell banks.</li> <li>Powerful sense of history in lanes inc Park and Littleton.</li> <li>Landuse is horse stabling, allotments and playing fields (high quality) and transient.</li> <li>The Greensand Way.</li> <li>Adjacent Priory Park (SNCI) and Reigate Heath (SSSI).</li> <li>Tranquil.</li> <li>Priory Lane sunken lane.</li> <li>Extraordinary views of scenic quality across the Low Weald and scarp face of the Downs.</li> <li>Backdrop of the downs.</li> <li>Currently AGLV.</li> </ul> <p><b>Desirability</b></p> <ul style="list-style-type: none"> <li>Issues in desirability report apply to this area also.</li> </ul>	<p><b>Commentary</b></p> <p><b>Natural Beauty</b></p> <p>The Natural Beauty Assessment Report considered this area as part of EA11b. It noted that <i>'between Skimmington and Reigate Park the lower hillsides and flatter land has been affected by equestrian land uses, allotments and sports pitches'</i> (page 165). Natural England accepts that the lower slopes of Park Hill afford views of the chalk scarp and that the incised route of Park Lane is a distinctive landscape feature typical of the greensand hills. However, Natural England also notes that Park Lane is affected by heavy traffic at certain times and that the wider area is affected by settlement fringe land uses. Equestrian activity has resulted in visual clutter, and coupled with the low voltage overhead line which crosses Littleton Lane, and some more modern isolated development, has resulted in declining scenic and landscape quality, such that the area is not considered to meet the natural beauty criterion. Whilst the post and wire and post and rail fencing associated with equestrian use is transient, it is not the only factor affecting the natural beauty of this landscape.</p> <p><b>Desirability</b></p> <p>For land to be considered desirable to designate it must first meet the Natural Beauty Criterion. Given that the area is not considered to qualify in terms of its natural beauty, Natural England has not considered it in terms of desirability.</p> <p><b>Boundary</b></p> <p>Overall, Natural England does not consider that this area qualifies in terms of natural beauty and remains of the view that the current proposed boundary is robust.</p> <p><b>Conclusion</b></p> <p>No change.</p>



Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> <li>• Need to protect nature corridor between Reigate park and Reigate Heath.</li> <li>• Preservation of scenic linkage between Priory Park and Reigate Heath.</li> <li>• Park Lane is under threat of suburbanisation.</li> </ul> <p><b>Boundary</b> Additional area south of Skimmington and extending to Park Hill and Lane.</p> <p><b>ANON-VUXE-WEEV-Y</b> <i>'The boundary could be extended slightly further north, east and south to protect the sunken section of Park Lane and the hamlet of Ede's Fields - see attached annotated map. The boundary could head north east from Littleton Manor Farm, turning south east to connect with Park Lane at the culvert, then right and south until it reaches the footpath south of Sandfells, turn right and then follow the footpath until it meets the Wallace Brook, which then forms the natural boundary heading north until reconnecting with the proposed AONB boundary at Littleton Manor Farm.'</i></p> <p><b>ANON-PQ5Q-KR3K-2 (Reigate &amp; Banstead Borough Council)</b> <i>'We note that further additions have been proposed in this area but that extensions of the Boundary to the west of Reigate and northwest of Reigate have been omitted due to; 'the landscape had been influenced by the urban fridge land uses (including allotments and sports pitches), as well as equestrian uses around Littleton Lane. This has resulted in a decline in</i></p>	<p><b>Commentary</b></p> <p>The Natural Beauty Assessment Report (pages 172) concluded that Reigate Hill met the Natural Beauty Criterion and was included within the proposed Candidate Area. However, it also noted a need for particular scrutiny at the boundary setting stage in areas of transition to the south and adjacent to the urban edge of Reigate.</p> <p>The Boundary Considerations Report (page 47) stated <i>'Detailed assessment at the boundary stage revealed that the elevated woodland of Reigate Park was separated from the wider area of qualifying land by a lower lying area. Here the landscape has been influenced by urban fringe land uses (including allotments and sports pitches),</i></p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>landscape quality and condition such that the elevated woodland of Reigate Park had become isolated. Furthermore its northern boundary was difficult to define.....' (Consultation Statement 2024 page 38).</i></p> <p><i>In response we consider that the separation due [to] Park Lane Road is misleading as it is a narrow sunken road which is in part heavily treelined. Indeed, there are similar roads cutting through the Greensand Ridge which are included in the National Landscape [AONB]. The exclusion of land in use by horses is raised as a broader issue above, and that such a use helps to keep the land open and cared for, and by consequence makes a positive contribution to the landscape. We would ask that our original proposals are reconsidered.'</i></p>	<p><i>as well as equestrian uses around Littleton Lane. This has resulted in a decline in landscape quality and condition such that the elevated woodland at Reigate Park has become isolated. Furthermore, its northern boundary was difficult to define - woodland extending as a feathered edge into the Reigate Priory Playing Fields and around Reigate Pond. On balance, a judgment was made to exclude this area, and a boundary was defined further to the west.'</i></p> <p>This analysis makes it clear that the isolation of Reigate Park is not due to Park Lane Road (which was acknowledged in the Natural Beauty Assessment Report as a distinctive landscape feature), but rather due to the lesser quality landscape which surrounds Reigate Hill and lies to the north and west of Park Lane Road. A variety of reasons for this lower quality landscape are set out in Natural England's earlier response above and include equestrian use, urban fringe land uses and pylons.</p> <p>Issues relating specifically to equestrian use of land are set out in Appendix 1, pages 11-13.</p> <p>Natural England maintains that the exclusion of Reigate Hill is appropriate for the reasons given previously.</p> <p><b><u>Conclusion</u></b> No change.</p>
Land south of Littleton Lane to Clayhall Lane	<p><b>ANON-VUXE-WEEV-Y, ANON-VUXE-WM3K-A, ANON-VUXE-WM2G-5, ANON-VUXE-WEG5-Z,</b></p> <p>Reasons given for the inclusion of this additional land include:</p> <p><b>Natural Beauty</b></p> <ul style="list-style-type: none"> <li>• Area is well maintained.</li> <li>• Wetland associated with Wallace Brook.</li> </ul>	<p><b><u>Commentary</u></b></p> <p><b>Natural Beauty</b></p> <p>The Natural Beauty Assessment Report considered this area as part of EA11b. It noted that '<i>South of Reigate Hill, around Flanchford Road....there is evidence of substantial field boundary loss, and the landscape has a more open and intensively farmed character. Here the condition of the landscape is less intact.</i>' It goes on to state that '<i>Similarly, on the south side of the greensand ridge and to the west, scenic quality is transitional as the topography becomes less distinct and the visual</i></p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> <li>• Hamlet of Ede's Fields.</li> <li>• Ancient woodland south of Littleton Lane.</li> <li>• Adjacent Priory Park.</li> <li>• Priory Lane sunken lane.</li> <li>• Land use is farming and horse stabling subdivided by small woods and hedgerows.</li> <li>• Landscape patterns similar in character to land included to west.</li> <li>• Peaceful, limited light pollution.</li> <li>• Elevated views from Edes Hill towards the chalk scarp.</li> <li>• Backdrop of the downs.</li> <li>• Currently AGLV.</li> </ul> <p><b>Desirability</b></p> <ul style="list-style-type: none"> <li>• Area would benefit from protection given potential loss of AGLV and pressure for development associated with A217 corridor.</li> <li>• One of the narrowest sections of Green Belt.</li> </ul> <p><b>Boundary</b> Respondents provided a number of different boundary options including as far as Wallace Brook, or further west to Flanchford Road or as far as the River Mole.</p>	<p><i>association with the chalk escarpment to the north is lost. These latter areas form an attractive Low Weald landscape.'</i></p> <p>Page 169 of the Natural Beauty Assessment Report concluded that <i>'to the south and west....the landscape is in transition, as the topography becomes less distinct, and views and vistas northwards to the chalk escarpment, substantially reduce, and the landscape is used for intensive arable farming.'</i> It went on to conclude on page 173 that <i>'Particular scrutiny will also be required at the boundary setting stage in areas of transition to the south....'</i></p> <p>A review of this area has confirmed the analysis above as well as noting that Little Wallace Brook is not a significant feature within this more open farmed landscape and makes only a limited contribution to natural beauty. Furthermore, the more undulating and elevated slopes around Littleton Manor Farm are influenced by equestrian land uses which have caused some visual fragmentation as a result of field division and horse shelters. Whilst views to the chalk scarp are more limited from this area it is noted that from rising land at Ede Cottages there are long distance views westwards to the greensand hills at Abinger Forest.</p> <p>In the Boundary Considerations Report (page 47) the assessment noted that <i>'Particular scrutiny has been given to the transitional nature of the landscape to the south and west. Here the greensand hills are declining in elevation giving way to an open and flatter agricultural landscape which lacks the scenic quality of the parkland landscape along the River Mole and close proximity views to the chalk scarp to the north. The boundary east extended to the south, to include the rising slopes of the greensand hills where they define the River Mole corridor around Ricebridge Farm and, where there are strong signs of former parkland and intact enclosure patterns. The boundary includes qualifying land at the higher end of the transition, excluding areas of latter open farmland to the south and west.'</i></p> <p>Natural England does not consider the additional evidence provided by respondents alters these conclusions.</p> <p><b>Desirability Issues</b></p>

<b>Boundary</b>		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
		<p>Desirability issues associated with AGLV and Green Belt are addressed in Appendix 2.</p> <p><b><u>Boundary</u></b> Natural England believes the proposed boundary remains robust.</p> <p><b><u>Conclusion</u></b> No change</p>
<b>Land north of Old Reigate Road, Northwest of Betchworth</b>	<p><b>ANON-VUXE-W5WF-H</b></p> <p>Reasons given for the inclusion of this additional land include:</p> <ul style="list-style-type: none"> <li>• Square off the designation.</li> <li>• No reason to exclude areas of quarrying as there are already quarries in the AONB.</li> <li>• The quarry is currently being restored to a high standard.</li> </ul>	<p><b><u>Commentary</u></b> The Natural Beauty Assessment Report considered the land north of the Old Reigate Road as far as the railway in EA11a and EA11b. It noted that Old Reigate Road quarry is currently undergoing restoration and has recently been awarded planning permission for a permanent minerals recovery facility on part of the former quarry (page 165) and that commercial development has occurred at the roundabout junction between the A25 and Station Road north of Betchworth (page 162).</p> <p>In defining a boundary to an Extension Area there is no requirement to 'square off' an area as depicted on a map. Where quarries are included within landscape designations they form part of a wider tract of qualifying land. Active quarries on the margins of a designation are generally excluded in accordance with Natural England Guidance. In this instance the former quarry and planning permission for a minerals recovery facility lie within a wider tract of non-qualifying land, affected by past land uses and the A25 road corridor.</p> <p><b><u>Conclusion</u></b> No change.</p>

Boundary		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
<b>Land west of Brockham</b>	<p><b>ANON-VUXE-WSQG-A and ANON-VUXE-WSQ4-Q</b></p> <p>Reasons given to include this additional area of land included:</p> <ul style="list-style-type: none"> <li>Views north to Box Hill and south to Leith Hill.</li> <li>Tranquillity.</li> </ul> <p><b>Boundary</b></p> <p>The proposed boundary is defined by Old School Lane and the railway as far south as Bushberry Farm/Parkpale Lane, but excluding the oil well.</p>	<p><b><u>Commentary</u></b></p> <p>The Natural Beauty Assessment Report considered this area as part of EA11c. It noted that the area was <i>'in good condition but formed flatter farmland which is surrounded by higher hills within the AONB to the north and west....'</i> It concluded that <i>'the area has a utilitarian agricultural character of moderate landscape and scenic quality.'</i> To the northeast the settlement of Brockham and Strood Street were also excluded.</p> <p>The area south to Parkpale Lane was reviewed. It is acknowledged that this area of land has views to the chalk scarp and surrounding hills and that it is relatively tranquil. It is also noted that the Oil Well is not visible from the surrounding landscape, screened by vegetation. However, there is some localised visual clutter associated with Bushbury Farm, and although forming wider countryside, this landscape lacks the qualities that mark it out as nationally outstanding. For these reasons Natural England does not consider the boundary should be extended to include this area.</p> <p><b><u>Conclusion</u></b></p> <p>No change.</p>
<b>Include land south of Inholm's Lane and land west of A24 at Glory Woods SNCI</b>	<p><b>ANON-VUXE-WEV7-H</b></p> <p><i>'We recommend the additional inclusion of that block of land south of Inholm's Lane &amp; west of Blackbrook road (including Inholm's Brick-pit LWS/SNCI). This would be for reasons of nature/biodiversity/ecological conservation and also scenic beauty. Consideration might also be given to inclusion of land west of the A24 at the Deepdene cutting (to include Glory Woods SNCI/Local Nature Reserve).'</i></p>	<p><b><u>Commentary</u></b></p> <p>Holmwood Park Site of Nature Conservation Importance (SNCI) lies to the north of Inholms Lane, adjacent to built development and Glory Wood SNCI lies within the built-up area to the north, and to the west of the A24 - it is therefore isolated from the wider area of qualifying land. South of Inholms Lane is the Inholms Clay Pit Nature Reserve, comprising a former clay quarry and including young establishing woodland, open grassland and areas of bare ground. The site is managed by Surrey Wildlife Trust and Mole Valley District Council. South of this is open mixed farmland and a dispersed pattern of rural farm businesses and settlement. The landform is gently undulating and substantially defined by woodland.</p> <p>Overall Natural England does not consider this land to have sufficient natural beauty to justify being designated as a nationally important landscape. The wildlife sites</p>

Boundary		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
		<p>noted by respondent <b>ANON-VUXE-WEV7-H</b> are acknowledged as having natural heritage interest, but the areas concerned are fragmented from the wider tract of qualifying land by development or infrastructure and the wider farmland west of Blackbrook Road and south of Inholms Lane lacks distinction. The current AONB boundary, which includes Holmwood Common, is considered to be robust.</p> <p><b><u>Conclusion</u></b> No Change.</p>