

Appendix 16: Godstone Hills

Please refer to Figure 24a

Overview

Question C1: Does the Godstone Hills Extension Area have sufficient natural beauty to be designated as AONB?

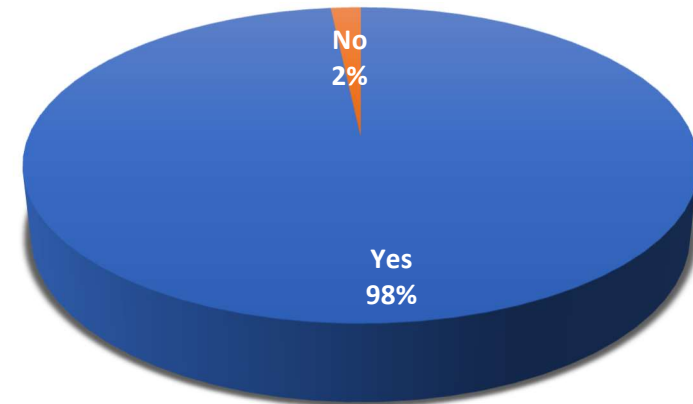
Natural Beauty	Responses
Yes	115
No	2
Not sure	0

Of the 117 respondents who answered question C1, 115 respondents (98%) felt that the Godstone Hills Extension Area has sufficient natural beauty to be designated as AONB.

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

Desirability reasons for including and excluding land within the proposed extension tended to focus on planning issues. These are addressed in Appendix 2.

Godstone Hills - Sufficient natural beauty to be designated



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

Boundary	Responses
Yes	6
Yes, but I wish to suggest an alternative	95
No	15
Not sure	2

Of the 118 respondents who answered question C5, 6 respondents (5%) agreed with the proposed boundary for the Godstone Hills Extension Area and 15 respondents (13%) did not.

95 respondents (80%) agreed but wished to suggest an alternative boundary for the Extension Area, many providing supporting evidence.

This was the highest number of responses for any of the proposed Extension Areas. Many respondents made similar points, and a number of the submissions were identical. Furthermore, a wide range of alternative boundary options were identified.

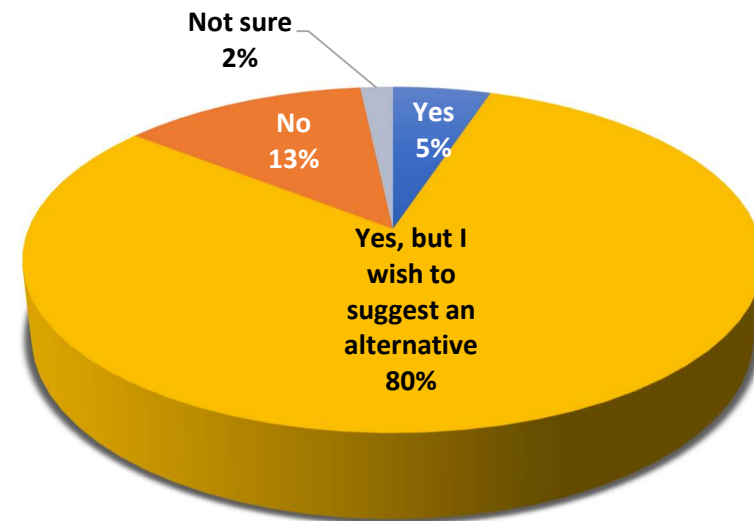
The additional areas of land that respondents wish to see include within the proposed extension are:

- Stoney Field and The Bogs
- Old Oxted Mill area
- Land north of Southlands Lane
- Rooks Nest Park
- Land up to the Tonbridge to Redhill railway line
- Land between the proposed boundary and High Weald AONB
- Land east of the M23
- Land west of the M23
- Mercer Lake
- The Strip
- Nutfield Marsh Common

The areas of land that respondents wish to see excluded from the proposed extension are:

- Land north of Hart's Lane
- Allocated land Lambs Business Park and exclusion of Maple Wood and field parcel to the west (formerly Seven Acre Wood)

Godstone Hills - Agreement with the proposed boundary



Natural Beauty		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
The proposed extension meets the Natural Beauty Criterion	<p>Many respondents agreed that the proposed extension met the natural beauty criterion.</p> <p>ANON-VUXE-WMWW-T <i>‘This area forms part of the foreground to dramatic sweeping views northward to the North Downs.’</i></p> <p>ANON-VUXE-WMZG-D <i>‘Yes - beautiful scenery, tranquillity and natural wildlife (many species of bird, wild rabbits and deer to name a few).’</i></p> <p>ANON-VUXE-WEXR-E <i>‘The natural beauty assessment correctly summaries the evidence against the relevant natural beauty criterion that supports the identification of the majority of the Godstone Hills proposed extension area as defined’.</i></p> <p>ANON-VUXE-WEQ5-A <i>‘The answer here is clearly ‘Yes’, the area fulfils many of the 6 tests of natural beauty’.</i></p> <p>ANON-VUXE-WEWV-H <i>‘Yes...[this area]... has significant natural beauty, it has long been seen as an area of natural beauty and due to the wonderful green landscapes ancient woodland and wildlife is seen by residents and visitors as greenbelt. Godstone is a beautiful scenic area, the roads around where [we live] ...are not major and are surrounded by rolling countryside and fields’.</i></p>	<p><u>Commentary</u></p> <p>Natural England agrees that land within the proposed Extension Area meets the natural beauty criterion for designation as AONB and that additional evidence provided by respondents supports the findings of the Natural Beauty Assessment Report.</p> <p>Natural England has also taken account of detailed responses requesting changes to the boundary and proposes some amendments. These are set out below.</p>

Natural Beauty		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<p>ANON-VUXE-WM4K-B <i>'It has outstanding landscape with distinctive character and natural beauty'</i></p>	
<p>The proposed extension does not meet the Natural Beauty Criterion</p>	<p>ANON-VUXE-WMWH-B considered the area to not meet the Natural Beauty Criterion, although no justification was given.</p> <p>ANON-VUXE-WMPQ-D considered that the proposed extension did not meet the natural beauty criterion for the following reasons:</p> <ul style="list-style-type: none"> • The area is predominantly covered by farms, livery yards and rural housing. • The area has no specific or distinctive features which mean it should be designated as an area of outstanding natural beauty. • If all countryside such as this should be classified as AONB, then the majority of the UK countryside would also have this classification. • I do not understand the rationale for identifying this as an AONB vs other countryside areas in the UK. There are no distinguishing features for this change to be justified. 	<p><u>Commentary</u></p> <p>Natural England does not agree that the proposed Extension Area lacks natural beauty. Natural England disagrees that the land within the Extension Area has no specific or distinctive features which distinguish it from the majority of UK countryside.</p> <p>Natural England has assessed the landscape in considerable detail against the factors set out in the Natural England Guidance on Assessing Landscapes for Designation and has defined a boundary conservatively within areas of transition.</p> <p>Extensive areas of land to the south of the proposed boundary have been excluded on the basis they lack defining qualities which lift them above wider countryside.</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
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>ANON-VUXE-WEBC-9 <i>'I would certainly wish to support the proposed southern boundary extension of the AONB for the Godstone HillsThe area in question deserves to be preserved for its beauty and for the benefit of the local community.'</i></p> <p>ANON-VUXE-WEGZ-D <i>'I love this area, and along with many others frequently enjoy walks within it. I want my children to be able to do the same for years to come.'</i></p>	<p><u>Commentary</u></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 between M25 Junction 7 and 6	<p>ANON-VUXE-WEV7-H made the case for amending the existing AONB boundary between Junction 7 and 6 of the M25.</p> <p><i>'We observe that the present AONB boundary south of the M25 between J7 and J6 is presently largely unclear and un-fixed, where an opportunity to review and consolidate it has been missed. This no doubt reflects the fact that land-use in this area is in particular flux given its waste control function and active minerals extraction. However, we are of the opinion that respective post-minerals landscape restoration aspirations could be effectively</i></p>	<p><u>Commentary</u></p> <p>Natural England agrees that the boundary of the existing AONB between Junctions 7 and 6 of the M25 is not clear, in part reflecting the construction of the M25 and M23 since the AONB was designated as well as the current and past use of the area for minerals extraction.</p> <p>This landscape has experienced substantial change over the last 50 years and is currently subject to ongoing mineral working as well as restoration schemes and nature conservation enhancement. Sites that have, and are establishing, a higher value for nature conservation often occupy sites between active workings. Furthermore, between Junction 7 and 6 this land use is taking place both beyond the existing AONB boundary as well as within the relatively narrow strip of designated land, south of the M25.</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<i>anticipated by the establishment of the reviewed boundary.'</i>	<p>Natural England fully supports the inclusion of restored minerals and waste sites where they meet the natural beauty criterion and form part of a tract of qualifying land. Natural England Guidance is clear that <i>'Natural beauty is assessed in terms of the current landscape, not some future potential for improvement. A rare exception may however apply where an existing initiative will deliver positive change of a standard which will meet the natural beauty criterion within the short term and for which there is a high degree of certainty that it will be achieved.'</i> (paragraph 6.10, last bullet). Natural England is of the view that even if some of the restored mineral sites could deliver positive change of a standard which meets the natural beauty criterion in the short term, the fragmentation of the wider landscape in which individual sites sit would mean they would be unlikely to qualify for designation.</p> <p>The current minerals and waste activity associated with this land was reviewed during the Natural Beauty Assessment Report (pages 140 and 141), and it was concluded that the Natural Beauty criterion was not met across most of the greensand vale because it is eroded by the strong influence of busy roads, built development and mineral extraction activities. The completion of minerals and waste restoration activity does not equate to the landscape having reached full recovery, or of a standard that meets national landscape designation. Furthermore, land is assessed against the natural beauty factors and across a tract of landscape where all factors are taken into account. Natural England has not sought to deliberately exclude minerals and waste sites and has included some sites such as Oxted Sandpit and oil field at Coney Hill both of which will be restored by 2025, are relatively small in scale and form part of a wider tract of qualifying land.</p> <p><u>Conclusion</u> No change</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
Include Stoney Field and The Bogs	<p>A significant number of respondents provided evidence to support the inclusion of Stoney Field and The Bogs to the northwest of Oxted including ANON-VUXE-WS1M-G, ANON-VUXE-WM4C-3, ANON-VUXE-WM8K-F, ANON-VUXE-WMZ6-V, ANON-VUXE-WM9M-J, ANON-VUXE-WM8H-C, ANON-VUXE-WMWM-T, ANON-VUXE-WMTJ-A, ANON-VUXE-W5Y7-4, ANON-VUXE-WM4K-B, ANON-VUXE-WMUM-E, ANON-VUXE-W58R-X, ANON-VUXE-W559-2, ANON-VUXE-WM8Z-X, ANON-VUXE-WMDD-M, ANON-VUXE-WMWA-4, ANON-VUXE-WEQF-U, ANON-VUXE-W58B-E, ANON-VUXE-WM9Z-Y, ANON-VUXE-WMPH-4, ANON-VUXE-WM27-N, ANON-VUXE-WEXY-N, ANON-VUXE-WM2P-E, ANON-VUXE-WM8Q-N, ANON-VUXE-WM9A-6, ANON-VUXE-WMW1-M, WEQN-3, ANON-VUXE-WM18-N, ANON-VUXE-W5MR-K, ANON-VUXE-WMYU-T, ANON-VUXE-WMYP-N, ANON-VUXE-W5Y4-1, ANON-VUXE-WMTB-2.</p> <p>Evidence was often the same and used similar wording. The reasons put forward have been summarised as follows:</p> <p>Natural Beauty</p> <ul style="list-style-type: none"> • Stoney field is a beautiful field with stunning sweeping views of the north downs. • Foreground to the dramatic North Downs. • There are beautiful bluebell woods on two edges of the field. • The Bogs is a Site of Nature Conservation Interest and an area of ancient wet woodland, rare in Surrey. This area has a 	<p><u>Commentary</u></p> <p>The evidence presented by respondents has been reviewed along with the technical assessments and judgements reached in this area.</p> <p>This area was included within the Candidate Area and noted as containing natural heritage features. Natural England agrees that these areas form part of a sweep of landscape up to the settlement boundary and that Stoney Field affords dramatic views of the chalk scarp.</p> <p>At the boundary setting stage issues were raised associated with a) declining topography which sloped towards the town of Oxted b) presence of allotments and c) issues associated with following clear features on the ground due to the vegetated property boundaries extending into areas of woodland. Adoption of the boundary along Barrow Green Lane and Sandy Lane allowed dispersed development along Sandy Lane to be excluded.</p> <p>Natural England acknowledges that reference to allotments is an error and should instead refer to burial grounds associated with the church. This land use is considered to relate to the settlement of Oxted and Natural England remains of the view that these burial grounds should not be included within the proposed AONB extension.</p> <p>Natural England acknowledges, following further review, that an alternative boundary can be defined which enables The Bogs (a feature of interest on the edge comprising ancient and deciduous woodland) to be included, through the adoption of the settlement boundary (as defined in the Tandridge Local Plan), as well as the use of a watercourse and field boundaries to the east of Sandy Lane. Natural England also acknowledges that the open arable field between Barrow Green Lane and the settlement edge forms part of a sweep of agricultural landscape to the north and affords dramatic views of the chalk scarp, Whilst this results in a more convoluted boundary, Natural England considers on balance it reflects the continuation of the landscape to the urban edge, despite declining elevation, and that the settlement edge does not exert a significant influence on the qualities of this land. The use of</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<p>high degree of relative wildness – close immersive connection with nature.</p> <ul style="list-style-type: none"> • These two lovely areas are no different to the areas around it which are now AONB. • Stoney Field and The Bogs blend seamlessly with the north downs and surrounding area and is no different. • Spectacular after snowfall as it is in spring, summer and autumn colours. • Field abounding in flints. • Mature tree belts around Blunt House (listed building). • Incorrect reference to allotments. <p>Boundary</p> <ul style="list-style-type: none"> • Stoney Field has a natural boundary following the railway line, the boundary with St Mary's church graveyard, the gardens of Wheeler Avenue and The Bogs to the east and south. • Follow the line of Green Belt. • Oxted Line railway serves as a very well defined eastern boundary, with the churchyard and cemetery doing the same to the south. • A boundary can be defined which follows the railway, grave yard and settlement boundary as defined in the Tandridge Local Plan. • The proposed boundary does not follow the Green Belt boundary. 	<p>Green Belt boundary was not considered appropriate as this does not always follow a clear feature on the ground.</p> <p><u>Conclusion</u></p> <p>Minor addition to include land south of Barrow Green Lane to the settlement edge of Oxted and to include the natural heritage feature of The Bogs.</p> <p>The new proposed boundary excludes development along Sandy Lane where it has an urbanising effect on the lane through access drives and brick gates.</p> <p>(Addition 13 – Refer to Figure 23a)</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
<p>Include Old Oxted Mill Area</p>	<p>ANON-VUXE-WM59-T and ANON-VUXE-WMZG-D requested the inclusion of land in the Oxted Mill area. The reasons for this are summarised below:</p> <p>Natural Beauty</p> <ul style="list-style-type: none"> • This area offers exceptional scenery, wildlife and tranquillity. • Home to the historic old Oxted mill. • Start and end of the most popular walking route in Oxted. <p>This area was included in the candidate area, and in the Natural Beauty Assessment Report its beauty, scenery, tranquillity and cultural value is noted. Its current exclusion is only based on boundary feasibility.</p> <p>Boundary</p> <p>The boundary report does not suggest these are not viable, just that you've identified a more simpler boundary further west.</p> <p>There are viable boundaries that would preserve this area sensibly, such as</p> <ul style="list-style-type: none"> • The River Eden. • The Property boundaries on Woodhurst Lane. • Woodhurst Lane itself. 	<p>Commentary</p> <p>The evidence presented by respondents has been reviewed along with the technical assessments and judgements reached in this area.</p> <p>Natural England acknowledges that this area forms part of the Broadham Green and Spring Lane Conservation Area, Pol Ho Marsh provisional Site of Nature Conservation Interest (SNCI) and areas of Valley Floor and water management as defined in the Historic Landscape Characterisation (HLC). These features of interest and the pattern of small enclosures, meadow and wooded slopes along with historic buildings associated with the mill all contribute to the natural beauty of this area. The Natural Beauty Assessment Report noted the cultural heritage interest of this area including the mill and Broadham Green. These qualities resulted in the area being included within the Candidate Area.</p> <p>The boundary rational is set out for the Godstone Hills area in the Boundary Considerations Report. This was set out under 'Features on the Edge'. It stated that <i>'Consideration was given to the inclusion of Broadham Green conservation area. However, this also includes the Oxted Mill complex, the context of which is influenced by the edge of Oxted and Old Oxted. As a result, a decision was made to adopt a clear boundary along the road.'</i></p> <p>Consideration has been given to the suggested alternative boundaries. On review, the northern narrower parts of the River Eden valley were found to have an overgrown character and are influenced by adjacent development. These areas were found to not meet the natural beauty criterion. However, the area around the former mill and the historic lane (Spring Lane), as well as the traditionally managed meadows to the south and historic small-scale enclosures defined by mature hedgerows and trees to the east, were considered to meet the natural beauty criterion. Furthermore, the green associated with Broadham Green and part of the Conservation Area, forms a feature on the edge. On balance therefore Natural England now considers that an alternative boundary can be drawn further east which includes the majority of the Conservation Area and meadows as well as the attractive buildings which form part of the former mill complex. This boundary also requires the inclusion of a small area of more recent development at Broadham Place. This is considered acceptable given</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
		<p>the development is well screened and has little impact on the qualities of the surrounding qualifying area. The boundary has not been extended further east due to more recent development along Tanhouse Road and the declining quality of pastures.</p> <p>This option enables the main features of interest to be included within the proposed extension.</p> <p>Conclusion Minor addition to include some of the land in the Oxted Mill area.</p> <p>(Addition 14 – Refer to Figure 24a)</p>
<p>Inclusion of Godstone Golfcourse and Rooks Nest Park</p>	<p>ANON-VUXE-WEAP-N [Anon] submitted a map requesting consideration of the land between the existing AONB and Oxted Road to the northeast of Godstone. No detailed reasons were given for this additional area, although a series of more general comments were put forward relating to the approach adopted by Natural England to the boundary review. These general issues have been addressed under 'Method and Approach' and can be found in Appendix 1.</p> <p>ANON-VUXE-WS13-P <i>'Negative reference is also made of Godstone Golf Course which contrary to what is said, fits into the surrounding area in a very sympathetic way. Whilst we do understand that the definition of "beauty" is always going to be an extremely subjective exercise, we also feel that NE's consultant's have not exercised or applied a sufficiently wide or constructive approach.'</i></p>	<p>Commentary</p> <p>This area formed part of the EA10a in the Natural Beauty Assessment Report and the eastern part of the area was included in the Candidate Area. The Natural Beauty Assessment Report stated in relation to Landscape Quality that <i>'Further East between Godstone and Tandridge Lane the landscape is fragmented by roads (A22, A25 and M25 depot), a business park (Rock's Nest Park), the Godstone Golf Club course and a roadside garden centre.'</i></p> <p>Under Scenic Quality it states <i>'the Godstone Golf Course is part of a former parkland landscape and has a more open aspect which, though visibly an artificial golf course landscape, fits within the 'sweep' of the north-south vale views.'</i></p> <p>Under relative tranquillity it states <i>'This is not a tranquil landscape. There are major roads, settlements, golf courses and significant industrial activity (small Rooks Nest oilfield)...The noise from the motorways is a constant presence....'</i></p> <p>It also concluded in relation to Incongruous Features that <i>'There are various incongruous features at the margins of the qualifying areas. Care will be required at the boundary setting stage to review the effects of these features on natural beauty of the area to be designated, and especially any cumulative effects. These include the influence of masts, past landfill sites, business parks and oilfield sites.'</i></p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
		<p>The Boundary Considerations Report stated <i>‘The natural beauty assessment identified a number of issues affecting land to the northeast of Godstone. Natural beauty was met at the upper end of the vale but declined towards Godstone due to noise impact from traffic (M25, A25 and A22), road junctions, lighting and signage, current land uses including Godstone Golf Club, Highways England compound, garden centre (Nags Hall), Rooks Nest business park and oil well site, and disused workings at Coney Hill Sandpit. A boundary has therefore been sought to include the qualifying land at the head of the vale, connecting it across to the greensand hills to the south, whilst excluding land between the existing AONB boundary and the A25, and between the edge of Tyler’s Green and Tandridgehill Lane. Although change is anticipated in the excluded area, which may bring future enhancement (i.e. restoration of Palmers Wood oilfield to woodland by 2025 and the restoration of the Highways England compound site, albeit for possible use within the Godstone golf course), this area will nonetheless continue to be fragmented.’</i></p> <p>On this basis the boundary was drawn along the southern side of the M25 and to the east along Tandridge Lane. Natural England considers this judgment to be correct. The fact that this area is not an Area of Great Landscape Value and was not identified as suitable for AONB designation within the Hankinson Duckett Associates assessment (2013) further reinforces this view.</p> <p><u>Conclusion</u> No change.</p>
Southern boundary of the Godstone Hills - Overview	<p>Of the respondents who submitted a response on the Godstone Hills, a significant number commented on the southern boundary to the Extension Area. Requests were made for the following:</p> <ul style="list-style-type: none"> • Inclusion of land between Greensand Way and Southlands Lane to the southeast of Tandridge village. • Inclusion of land between Hill Road and Tandridge Lane as far as the railway. 	<p><u>Commentary</u></p> <p>In light of the range of responses Natural England reviewed the whole of the southern boundary between Outwood Lane and Broadham Green Road.</p> <p>The following commentary provides a summary of the circumstances that lead to the definition of the proposed boundary. This provides the context of the review of the individual areas which follow.</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<ul style="list-style-type: none"> • Exclusion of land between Eastbourne Road and Tandridge Lane. • Exclusion of land north of Hart's Lane. 	<p>Throughout this area the landscape was noted in the Natural Beauty Assessment Report as transitional moving from the Greensand Hills to the Low Weald. This transition is reflected in a decline in topography and topographic complexity but also the condition of field patterns and land uses. The assessment of natural beauty does not require land to have a particular characteristic to enable designation and therefore land of differing character can qualify for designation, so long as it has sufficient natural beauty. However, where there is a transition in landscape, boundary setting Guidance states that the boundary should be drawn conservatively at the higher end of landscape quality.</p> <p>In the Natural Beauty Assessment Report (page 158) the assessment concluded that <i>'The land of the undulating wooded greensand ridge between the M23 in the west and Oxted in the east, including the rolling foot slopes to the south of the ridge...'</i> were suitable for inclusion within the Candidate Area. It went on to state under issues that <i>'particular scrutiny will be required when defining a boundary in relation to transitional landscape to the south of the greensand ridge, fragmentation....on the edge of settlements, and also current planning allocations and permissions which may influence the extent of the area designated, and the definition of the boundary line.'</i></p> <p>Under 'Transition' (page 159) it stated <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 farmland 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....'</i> Care should be taken at the boundary setting stage to draw the boundary within the high-quality end of the transition in accordance with Natural England Guidance'.</p> <p>It went on to state under 'Settlements' (page 160) that <i>'In the South Godstone area, the emerging Tandridge Local Plan ('Our Local Plan 2033') is promoting the South Godstone Garden Community (Strategic Policy SGC01) which will deliver 4,000 homes, a mix of employment space, schools, local shops and community facilities and an upgraded railway station. The Area of Search for the new community lies beyond the area which is considered to meet the natural beauty criterion and is</i></p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
		<p><i>unlikely to affect the definition of a boundary, but this should be reviewed at the boundary setting stage.'</i></p> <p>The Candidate Area showed the extent of land likely to qualify for designation. A Candidate Area does not have a hard outward boundary. In the area of South Godstone the boundary extended south of Hart's Lane and in the area of New Road and Southlands Lane it was located further to the north.</p> <p>The proposed boundary sought to identify clear features within the transitional landscape. In this area, there are a number of east-west rural lanes which form clear features within the transition, and which were considered to form suitable features for a boundary to follow. This required the definition of a boundary within the Candidate Area along Hart's Lane and a track carrying the Greensand Way long distance route north of Southlands Lane. In the area of New Road, the boundary was extended further south, beyond the Candidate Area, in order to follow the lane – the clearest feature on the ground.</p> <p>Since completion of the boundary setting stage and Statutory Consultation the Tandridge Local Plan has been found to be unsound by the Local Plan Inspector.</p>
<p>Include land north of Southlands Lane between Tandridge Lane and Broadham Green</p>	<p>ANON-VUXE-WEQH-W and ANON-VUXE-WEGX-3</p> <p>Reasons given include:</p> <ul style="list-style-type: none"> • Southlands and Tandridge Hall add interest to an area. • Traditionally farmed pasture and hay meadow interspersed with woodland running down from the Greensand ridge into the Weald. • Represents a picturesque mixture of pasture and hay meadow and woodland. • More picturesque than areas of arable farmland to the west of Tandridge village 	<p>Commentary</p> <p>Natural England acknowledges that this area contains some large properties (Southlands and Tandridge Hall) set within established grounds and also Reddings Wood (pre 1811 assarted woodland) which is a Site of Nature Conservation Interest (SNCI). This area would have formed part of Tandridge Park and former parkland.</p> <p>Land between Southlands and Tandridge Hall are now used for arable and show evidence of field boundary loss. Alteration to field enclosure and the creation of larger arable fields is also evident to the east. Topographically the landscape is dropping in elevation as part of the southern slopes to the greensand hills which are most pronounced immediately adjacent to the Greensand Way lane, becoming relatively flat at Southland Lane. Furthermore, the Natural Beauty Assessment Report noted (page 149) that <i>'natural beauty was not met in the intensively farmed arable landscape to the south of...Southlands Lane.'</i> Overall, this area shows less</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<p>which is currently within the proposed boundary.</p> <p>Boundary</p> <p>The boundary should run across Tandridge Lane south of the village and follow Southlands Lane to rejoin at Broadham Green. This would take in the view from the Greensand Way and back up to the ridge from Southlands Lane and include two large country houses, Southlands and Tandridge Hall and a notable bluebell wood.</p> <p>In addition to the above inclusion of land north of Southlands Lane, respondent ANON-VUXE-WE3G-X also requested the inclusion of land south of Southland Lane, as far as the railway.</p>	<p>topographic variation comprising arable farmland with evidence of field boundary loss as well as a number of large farms with associated modern farm buildings.</p> <p>The part inclusion of land north of Southland Lane within the Candidate Area is a reflection of the above issues and transitional nature of this landscape. Furthermore, the Natural Beauty Assessment Report identified the settlement of Tandridge as requiring particular scrutiny at the boundary setting stage given its location within a transitional landscape (page 160).</p> <p>Tandridge village does not have a Conservation Area and contains only a couple of listed buildings to the south. The church (listed) is located in an elevated position to the north and is separate from the village. Considering both the transitional nature of the landscape and the character of the village and its peripheral location, a decision was made during the boundary assessment stage to exclude the settlement and to draw the boundary back to the lane which carries the Greensand Way. This enabled the boundary to be drawn at the higher end of the transition. Had the boundary followed Southlands Lane it would have been drawn at the outer edge of the transition and would have necessitated the inclusion of the settlement.</p> <p>On balance, Natural England remains of the view that the proposed boundary is the most suitable boundary.</p> <p>Conclusion No change</p>
Inclusion of land up to the Tonbridge to Redhill railway line	<p>Respondents requested the inclusion of land as far as the Redhill-Tonbridge railway line.</p> <p>ANON-VUXE-WEAP-N, ANON-VUXE-WS1P-K, ANON-VUXE-WEQ5-A, ANON-VUXE-WESP-7, ANON-VUXE-WEMW-8, ANON-VUXE-WEZD-2, ANON-VUXE-WEZW-N, ANON-VUXE-WEV9-K, ANON-VUXE-WE2J-Z, ANON-VUXE-WEQ7-C,</p>	<p>Commentary</p> <p><u>Withdrawal of the Tandridge Local Plan</u></p> <p>Natural England notes the material change in circumstances associated with the Tandridge Local Plan including:</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<p>ANON-VUXE-WER7-D, ANON-VUXE-WE6F-Z, ANON-VUXE-WE3G-X, ANON-VUXE-WEQE-T, ANON-VUXE-WEXW-K, ANON-VUXE-WERK-1, ANON-VUXE-WEJY-7, ANON-VUXE-WED9-1, ANON-VUXE-WES8-F, ANON-VUXE-WEMG-R, ANON-VUXE-WEAH-D, ANON-VUXE-WEZJ-8.</p> <p>Evidence was often the same and used similar wording. The reasons put forward have been summarised as follows:</p> <ul style="list-style-type: none"> • The removal of the proposed garden village from the emerging local plan. • The boundary should not be drawn around the former Garden Village Area of Search. • The area as far as the railway was originally proposed for designation. • The only busy road is the A22, all other roads are rural. • Limited aircraft noise and development. • Shares the same characteristics as the nearby EA10b Candidate Area. • Same natural beauty characteristics as the EA 10b candidate area. <p>ANON-VUXE-WE71-C (Tandridge District Council) provided a detailed analysis of the area against the natural beauty factors as follows:</p>	<ul style="list-style-type: none"> • The correspondence from Tandridge District Council to the Inspector detailing an update to the Spatial Strategy which removes the proposed South Godstone Garden Community¹. • The recommendation by the Inspector that he found the plan to be unsound and recommended the Local Authority to withdraw it. • The decision by Tandridge District Council to not withdraw the plan but to ask the Inspector to prepare his report and findings. <p>As a result, there is no emerging local plan which is at an advanced stage.</p> <p>Importantly the proposed boundary did not include land which fell within the Area of Search for the Garden Village. The Natural Beauty Assessment Report highlighted the need to review the Garden Village at the boundary setting stage but also highlighted that <i>'the area of search for the Garden Village lies beyond the area which is considered to meet the Natural Beauty criterion and is unlikely to affect the definition of a boundary'</i> (page 160).</p> <p>The proposed boundary was drawn along Hart's Lane because this was considered to be a robust feature within the area of transition. The boundary of the Garden Village Area of Search was not the determinative factor in selecting the proposed boundary. Natural England is still of the view that Hart's Lane is a robust feature and an appropriate boundary within the transitional landscape between the Greensand Hills and the Low Weald.</p> <p><u>The inclusion/exclusion of the settlement of South Godstone</u></p> <p>This has been reviewed. The settlement of South Godstone is a post 1950's settlement located within the former Langham Wood (formerly part of Langham Park to the south which was severed by the introduction of the railway). Natural England</p>

¹ Correspondence number TED581 dated 24 March 2023 from TDC to the Inspector

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<p>Landscape Quality</p> <ul style="list-style-type: none"> • Low lying landscape with a broadly undulating land form. • Distinctive undulating topography which is diverse. • Generally consistent network of well-maintained hedges and tree belts enclosing pasture and grassland interspersed with blocks of woodland, some of which are designated ancient woodland. • Field boundaries in this area are in good condition. • Ever-changing and diverse views of undulating land forms, open fields, and woodland backdrops. • Gibbs Brook, a small river tributary of the River Eden - alive with fish and crayfish. This natural feature generates its own sense of place. • Majority of this hedgerow removal has occurred.... within the extended AONB - The majority of the Godstone Hills – South area has retained the historic field patterns. <p>Scenic Quality</p> <ul style="list-style-type: none"> • The landforms change naturally from the Greensand ridge less than a kilometre away (defined by the Greensand Way) to the foot slopes and then to the undulating land forms. • This transition does not result in a decline in scenic quality, instead this transition is an important element which contributes to the natural beauty. 	<p>remains of the view that South Godstone does not qualify for inclusion within any extension to the Surrey Hills AONB.</p> <p><u>Natural Beauty of the area</u></p> <p>A review of the evidence submitted during the Statutory Consultation along with further site assessment has confirmed the distinction between land to the west and land to the east. Respondents noted a number of omissions in the Natural Beauty Assessment Report relating to ancient woodland and Gibbs Brook. Natural England is of the view that in undertaking a Natural Beauty Assessment across wide tracts of land it is not always possible to list or name all features of interest. This should not be taken to imply an omission from consideration.</p> <p>Land west of the A22 and south of Hart's Lane</p> <p>This land is an Area of Great Landscape Value (AGLV) and comprises the lower footslopes of the greensand hills (rising slightly at Stanstead House and then dropping towards the railway). This area contains remnant parkland features at Posterngate Farm (as noted in the Natural Beauty Assessment Report) and Stanstead House. There is linear ancient woodland along the former park pale to the west of South Godstone such that the settlement is not readily perceived. There are also some listed buildings at Nash's Farm and an area of pre 1811 woodland at Furze Wood as well as an intact pattern of hedgerows defining small scale pastures.</p> <p>Natural England agrees that this area forms part of the transitional landscape between the greensand hills and railway. However, this lower lying landscape shows some signs of increased development including farm buildings which have recently been, or are currently being, converted to dwellings e.g. associated with Stanstead House and Norbryght and also equestrian land use and development. Furthermore, there are a number of small businesses and commercial development associated with Rosedean Farm and Stanstead House. Natural England considers that whilst land south of Hart's Lane has some similar qualities to land to the north, its quality is declining and its natural beauty is transitional.</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<ul style="list-style-type: none"> • Open and rural character that is enhanced by the gently undulating landform. • The visual interest is heightened by the presence of diverse natural features, including woodlands, tree belts, hedgerows, ponds and fields. • Interconnected mosaic of woodlands including shaws, fields, farmsteads and parklands. • The settlement of South Godstone - presence is minimised. • Impact of this farmland has been over-stated in the consultation documents - arable fields part of the overall mosaic of grassland, pastures, farmland, hedgerows, woodlands and tree belts that stretches continuously in this undulating landscape from the Greensand ridge to the railway line. The few medium-sized arable fields form a minor part of a much wider area where the historic field patterns, hedgerows and ancient woodlands and tree belts predominate because they occupy a much greater proportion of the area. <p>Relative Wildness</p> <ul style="list-style-type: none"> • Pockets of relative wildness are experienced mostly in the woodlands and tree belts. <p>Relative Tranquillity</p> <ul style="list-style-type: none"> • For example, the Eastbourne Road (A22) runs north to south through all of EA 10b, and so its impact is the same in the Godstone Hills – South area as it is in the hashed area of Candidate Area EA 10b. 	<p>It is acknowledged that this area shares similar landscape characteristics to the wider landscape. However, the Natural Beauty Assessment Report para 5.2.2 noted '<i>Land does not need to have particular characteristics in order to qualify for designation. Conversely landscape of a particular type may not express the same level of natural beauty across an area e.g. it may be in transition. The assessment of land for designation must focus on natural beauty and the factors which contribute to this and is not determined based on character.</i>'</p> <p>Land to the east of the A22</p> <p>This area is not an Area of Great Landscape Value (AGLV). In this area the field enclosure pattern is larger scale reflecting boundary loss (as identified in the Historic Landscape Characterisation) and arable land use is more prevalent. This, coupled with the fact that the steeper slopes of the greensand hills pull back slightly to the north and that the land is becoming less topographically distinctive south of Stow Coppice, influences the natural beauty of this area. The Natural Beauty Assessment Report stated that '<i>Distinctive landscape character and scenic quality also diminishes on the gently rolling southern slopes of the ridge, where the landscape is in transition as the topography of the greensand ridge becomes less distinct. Natural beauty is not met in the intensively farmed arable landscape to the south of Hart's Lane and Southlands Lane.</i>' (page 149).</p> <p>Although not specifically named, Natural England accepts that east of the A22 there are a number of ancient woodlands, including Paygate Wood, and features of cultural heritage and that although there has been field boundary loss, there remain pockets of attractive countryside, as part of the transitional landscape to the south of the greensand ridge. Nevertheless, there has been field boundary loss and more widespread arable cultivation to the south and east of New Road resulting in a loss of landscape structure affecting landscape quality and scenic quality.</p> <p>The Candidate Area was drawn to include land north of New Road but did not extend as far as New Road itself, nor did it extend as far as the railway. The Candidate Area has no outward boundary and therefore reflects land which is likely to meet the natural beauty criterion and within which a boundary can be drawn.</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<ul style="list-style-type: none"> The Tonbridge-Redhill railway is electrified and supports only a limited service, which means the trains are rarely heard. <p>Natural Heritage</p> <ul style="list-style-type: none"> Natural Beauty Assessment Report.... omits the ancient woodlands that exist in the Godstone Hills. The area includes Ancient woodland at Furze Wood, Paygate Wood and an unusual linear tree belt that runs north to south along the western edge of the settlement of Godstone. Omits reference to Gibbs Brook and crayfish <p>Cultural Heritage</p> <ul style="list-style-type: none"> Park Pale and listed buildings. Paygate Wood and memorial site for crashed RAF pilot in WWII. <p>Desirability Many respondents cited the threat of development as to why it was desirable to include this land up to the railway line. Natural England responds to this under desirability in Appendix 2.</p> <p>Boundary A variety of boundary options were put forward. Many respondents requested the boundary extend as far south as the Redhill-Tondridge railway line, with the majority excluding the settlement of South Godstone but some including the settlement.</p>	<p>To the north of Miles Lane and New Road and in the vicinity of Gibbs Brook, Natural England acknowledges that field boundary loss has also occurred (west of Tandridge village), but considers that here the topographic variation, ancient woodlands and views to the chalk scarp to the north, collectively lift scenic quality. This area has been considered further in relation to the request by respondent ANON-VUXE-WEXR-E to exclude land north of Hart's Lane and north of Miles Lane and New Road due to declining natural beauty (see below).</p> <p>Boundary Natural England Guidance states that a boundary should be defined within the high-quality end of a transition i.e. it should be drawn conservatively. Visual association may also be used to help define the extent of land for inclusion in these circumstances.</p> <p>In terms of defining a boundary in this area, Natural England acknowledge that the railway line forms a strong linear feature in the landscape. However, the Natural Beauty Assessment Report highlighted that the railway swings southwards and away from the Greensand Ridge as it crosses rolling farmland near South Godstone (page 145).</p> <p>In the west, the proposed boundary has been drawn within the Candidate Area. The Candidate Area did not extend as far as the edge of South Godstone and the railway line because this land was considered to have declining scenic quality. The transitional nature of the landscape was noted as an issue which influenced the boundary line in the Boundary Considerations Report (page 43). The use of Hart's Lane, farm track and hedgerows to the west comprise clear boundary features. Natural England remains of the view that here the boundary is drawn at the higher quality end of the transition in accordance with Natural England Guidance.</p> <p>In the east, and as part of the review of response ANON-VUXE-WEXR-E Natural England has concluded that the boundary has been drawn less conservatively. An alternative boundary has therefore been sought further to the north. This is discussed</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<p>Others also requested an extension which went as far east as Tandridge Lane (including Paygate Wood) eg ANON-VUXE-WMJ1-7. Others requested a slightly smaller area as far as Miles Lane in the northeast.</p> <p>ANON-VUXE-WE3G-X requested inclusion of land east of Tandridge Lane and as far south as the railway.</p>	<p>more fully under the Exclude land north of Hart's Lane and north of Miles Lane and New Road below.</p> <p>As a result, Natural England proposes a small reduction in the area to be included within the proposed Extension Area.</p> <p>Conclusion Minor deletion to exclude land. Please see below for further details of this minor change.</p>
<p>Include land to the south as far as the Eden Valley and High Weald AONB</p>	<p>ANON-VUXE-WSK9-P, ANON-VUXE-WEBG-D, ANON-VUXE-W5MG-8, ANON-VUXE-WEKF-N, ANON-VUXE-WEE9-2, ANON-VUXE-WEZD-2, ANON-VUXE-WEWR-D, ANON-VUXE-WEZW-N, ANON-VUXE-WEV9-K, ANON-VUXE-WE2J-Z, ANON-VUXE-WEQ7-C, ANON-VUXE-WE6F-Z, ANON-VUXE-WEK8-7, ANON-VUXE-WEE2-U, ANON-VUXE-WS1P-K, ANON-VUXE-WS1N-H, BHLF-VUXE-WSKS-G, ANON-VUXE-WEQ5-A requested the boundary be extended to the south as far as the High Weald National Landscape (AONB) and to include nature conservation sites such as Blindley Heath Site of Special Scientific Interest (SSSI) and the River Eden Biodiversity Opportunity Area. A number of the responses were identical.</p> <p>Similar submissions were also made in relation the proposed extension of Limpsfield (refer to Appendix 15).</p>	<p>Commentary</p> <p>Issues raised regarding the use of the Surrey Landscape Character Assessment, weight given to roads, traffic and tranquillity are addressed in the analysis of Method and Approach in Appendix 1.</p> <p>Justifications for designating a wider area on the basis of the 2019 Landscape Review led by Julian Glover and the Lawton Review are dealt with under desirability and are set out in Appendix 2.</p> <p>Consideration of the landscape in the Natural Beauty Assessment Report The original area of search extended as far as the railway line and did not include land further to the south. This was reviewed following the 'Call for Evidence' where a significant number of submissions were received relating to land to the south. Consequently, the Evaluation Area extended to include an area to the southwest as far as Outwood (EA10e) and land to the southeast to include Crowhurst and Blindley Heath SSSI (EA10d). During the 'Call for Evidence' other areas further to the south were also requested for inclusion however initial desk-based assessment (Natural Beauty report page 25 para 444 and 445) excluded these areas given the focus of the boundary review was on the existing AONB boundary and Area of Greater Landscape Value (AGLV). However, this was kept under review during the assessment.</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<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"> • Surrey Biodiversity Opportunity area of the River Edem and tributaries • 2019 Landscape Review led by Julian Glover – national landscapes should be the backbone of nature recovery, joining things up within and beyond their boundaries. • 2010 Lawton Review – bigger, better and more joined up. <p>Some respondents expressed a concern that the Surrey Landscape Character Assessment (LCA) had not been given sufficient weight in the assessment and that reference to roads and traffic, noise and tranquillity and development in the Natural Beauty Assessment were not justified. These issues are considered in detail as part of Method and Approach in Appendix 1.</p> <p>Roads and Traffic</p> <p><i>‘The consultants say that “the roads are very busy” but only one, the A22, could be described as such and most are quiet country lanes. The conclusion here seems wrong.’</i></p> <p>Noise and Tranquillity</p> <p><i>‘They also say it is ‘not a tranquil area’ citing aircraft noise from the Gatwick pathway (which in fact only passes over a small area near Lingfield in the very</i></p>	<p><u>Natural Beauty</u></p> <p>Natural England notes that many respondents felt the reasons given to exclude this area from the Candidate Area following the Natural Beauty Assessment were an unfair description for the whole of EA10d and EA10e. Natural England has reviewed the evaluation tables for these areas which lie south of the railway and considers that it has fairly described the positive attributes of the landscape in EA10e and EA10d.</p> <p>For example, the Natural Beauty Assessment Report noted for EA10e that this landscape is a gently rolling farmland landscape, drained by minor tributaries to the River Eden in the east and that more elevated parts offer long views southwards to the High Weald and northward to the greensand ridge. Under landscape quality, it is noted as containing historic field boundaries and that mature hedgerow oaks are a distinctive landscape features which combine with small streams and woodland copes to give rise to reasonably intact character. It goes on to state that at a local scale, this landscape has a wealth of attractive features, including the pattern of farmland and ancient woodland near Crowhurst and natural mosaic of woodland and meadow at Blindley Heath. It also notes the presence of bluebell woods, veteran hedgerow trees, scenic views to village churches and remnant parkland.</p> <p>The issues identified in the Natural Beauty Assessment Report were not the absence of landscape features but rather that this landscape, although attractive, lacked the qualities that made it nationally outstanding. 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.</p> <p>Furthermore, the A22 corridor between South Godstone and Blindley Heath and field boundary loss south and east of Crowhurst, coupled with similar boundary loss north of the railway in EA10d, mean that higher quality parts of EA10e are physically separated from qualifying areas to the north by lesser quality land. A number of respondents acknowledged the development and traffic along the A22 corridor (e.g, ANON-VUXE-WEV9-K and ANON-VUXE-WERX-E) and Natural England agrees.</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<p><i>south of it) and noise from the A22 (which is not far-reaching and very much less than the din from the M25 in areas already in the AONB or which they propose adding to it).'</i></p> <p>Development</p> <p><i>'They say the area's rural character is "eroded by development", while a glance at a map will show that settlements are sparse and relatively small, and exert very much less influence than do Oxted, Caterham, Hurst Green Warlingham, Godstone and Bletchingley on areas that they, nevertheless, recommend for inclusion in the AONB.'</i></p> <p>Natural Beauty Respondents also gave reasons why the area is considered to meet the natural beauty criterion. These include:</p> <ul style="list-style-type: none"> • Gently undulating farmland. • Well maintained landscape. • Quiet country lanes. • Sparce settlement. • Views from elevated points to the North Downs and High Weald. • Blindley Heath SSSI (relic damp grassland supporting rare species). • Peacefulness. • Dark night skies. • Old farmhouses and listed buildings. 	<p>The conclusion of the Natural Beauty Assessment Report highlighted that the landscape contained attractive local landscape features, including ancient woodlands, historic farmhouses and veteran hedgerow trees and that although there is some weight of evidence for natural and cultural heritage, but overall, it was not considered to meet the natural beauty criterion for national landscape designation primarily due to its lack of distinctive qualities and in places evidence of declining quality due to development along the A22 between South Godstone and Blindley Heath.</p> <p>Natural England considers that this judgement is sound and that designation of the wider swathe of Low Weald landscape between the railway and High Weald AONB, would result in the inclusion of wider/ordinary countryside, and would not be in accordance with Natural England Guidance. 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> (ANON-VUXE-WEBG-D). The fact that this landscape has not been identified as an Area of Great Landscape Values (AGLV), strengthens this view.</p> <p><u>Inclusion of the River Eden Biodiversity Opportunity Area (BOA)</u> 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. Biodiversity Opportunity Areas identify the most important areas for wildlife conservation remaining in Surrey. The aim of Biodiversity Opportunity Areas 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. 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 of national significance. 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 Biodiversity Opportunity Area as a justification for including this part of the Low Weald within the proposed boundary extension. Furthermore, the assessment of natural</p>

Boundary		
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	<ul style="list-style-type: none"> • Church of St George's Church, Crowhurst and ancient yew. • Small brooks feeding the River Eden. • Ancient bluebell woodland. • Diverse wildlife. • Oldest working mill at Outwood. • Langham Moat (SSSI) and park pale. <p>Desirability</p> <p>Reasons put forward include the need to fulfil national policies which seek to join up protected areas and aid nature recovery.</p> <p>Boundary</p> <p>In terms of proposed boundaries some respondents requested the boundary be extended as far as Ray Lane or as far as the British Wildlife Area south of Blindley Heath. Others requested all of the land between the railway from Tilburstow Hill Road as far south as Blindley Heath and then east to the Surrey/Kent border and edge of the High Weald National Landscape (AONB).</p>	<p>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>Boundary</p> <p>Natural England has reviewed this area following consultation responses and has concluded that the wider swathe of Low Weald landscape south of the railway and as far as the High Weald National Landscape, comprises wider/ordinary countryside which 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.</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>Natural England has concluded that the land south of the railway does not have sufficient natural beauty to warrant designation as a National Landscape and that the boundary should be drawn further to the north.</p> <p>Conclusion</p> <p>No change.</p>
Inclusion of land east of the M23 and south of the A25	<p>ANON-VUXE-WSQ2-N (Tandridge District Council) and ANON-VUXE-WEAP-N</p> <p><i>'East of the M23 has natural beauty characteristics similar or better than in the rest of the Godstone Hills, namely a gentle undulating landscape of pasture, parkland, and scattered woodlands. This is accepted</i></p>	<p>Commentary</p> <p>This area was considered as part of EA10b in the Natural Beauty Assessment Report. This notes under scenic quality that <i>'some of the most scenic landscapes are those with a strong historic parkland influence, such as landscape near...Castle Hill Farm'</i>. Evidence of veteran in field oaks and ash are scattered throughout the fields between the M23 and Outwood Lane and the Natural Beauty Assessment Report notes the</p>

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	<p><i>in the AFA [Natural Beauty] assessment, but rejected for inclusion for one single reason: relative tranquillity. We dispute the weight given to this.</i></p> <p><i>The AFA [Natural Beauty] assessment in defining the western boundary for the Godstone Hills made what it called a “conservative” decision in placing the boundary along Outwood Lane, even though the natural beauty of the landscape further west towards Nutfield is as high in quality. The reason was noise from the M23. This is at odds with the decision on the Headley extension boundary which was taken right up to the M25.</i></p> <p><i>The AFA Natural Beauty Assessment claims that the M23 in this area is ‘visually intrusive.’ We recognise the M23 is an incongruous element, but this is mitigated by the dense woodland planting on the embankments.’</i></p>	<p>strategically sited earthworks of Bletchingly Castle which is a scheduled monument (albeit on the Heritage at Risk Register). Close to the M23 the field enclosure pattern has been eroded by field boundary loss. The M23 between the railway and Steners Hill is on embankment and although wooded in part, it nonetheless physically and visually fragments the flow of the greensand hills westwards.</p> <p>Natural England does not agree that the vegetation on the embankments is sufficient to screen or mitigate the noise of traffic which is further heightened due to prevailing winds. As a result, the audible roar of traffic has a marked impact on the lower lying landscape which sits adjacent and this effects not just tranquillity but also perceptions of landscape and scenic quality. The Natural Beauty Assessment Report concluded that the M23 corridor should not be included within the Candidate Area and that at the boundary setting stage particular scrutiny should be given to the effects of the traffic noise which results in a transition in natural beauty.</p> <p>The Boundary Considerations Report noted ‘<i>significant noise intrusion to the east of the M23, due to topography and prevailing winds.</i>’ (page 43) and that the boundary was drawn conservatively in accordance with Natural England Guidance. The boundary was drawn back towards Outwood Lane which was considered to form a clearly defined feature and where noise intrusion from the motorway was less impactful.</p> <p>Natural England does not consider that this is inconsistent with the decision taken in at Headly Hills area, where the proposed boundary extension was taken up to the edge of the M25. Natural England considers that the circumstances of the Headly Hills decision are not the same as those east of the M23. In the Headly area the M25 is within deep cutting and the adjacent landscape undulating. The Boundary Considerations Report stated that ‘<i>Consideration was given to drawing the boundary back, to exclude land around Frith Park, however on reflection the scenic qualities of the landscape (whilst declining) were considered to remain sufficiently strong given the undulating topography and blocks of ancient woodland. On this basis a pragmatic decision was made to draw the boundary along the top of the M25 embankments.</i>’</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
		<p><u>Conclusion</u> No change</p>
<p>Inclusion of land west of the M23 and south of A25</p>	<p>ANON-VUXE-WSKH-5</p> <p><i>‘Include specifically the landscape directly adjacent to Redhill, west of Fullers Wood Lane and south of Nutfield Road (A25). This area includes the end of the ridge in this section of the Greensand Ridge, to the hilltop of an area of what we believe is an area of outstanding natural beauty known as ‘Hillsbrow’.</i></p> <p><i>This area was omitted as part of EA10, prior to consultation starting in 2022. Why it was omitted hasn’t been explained and many people submitted requests that it should be included.</i></p> <p><i>..all the areas being proposed have issues and given these issues as reasons why they need to become AONB to ensure these issues are dealt with..... the area west of Fullers Wood Lane, Redhill, no different....’</i></p> <p>Natural Beauty reasons are summarised as follows:</p> <p>Landscape Quality</p> <ul style="list-style-type: none"> • Strong visual connection to the wider landscape being the highest point (160m) of the Greensand Ridge – striking feature. • Ancient woodland and wooded shaw. • Former Fullers Earth works are rewooded. <p>Scenic quality</p> <ul style="list-style-type: none"> • The dramatic hilltop and scenic quality of Hillsbrow and its surrounding ancient 	<p><u>Commentary</u> <u>Natural Beauty Assessment and Exclusion of Area from Candidate Area</u></p> <p>This area was assessed as part of EA10b.</p> <p>The Natural Beauty Assessment Report highlighted that the M23 causes significant fragmentation of the greensand ridge (page 144) and that <i>‘it is visually intrusive in an area to the east of South Nutfield where it is aligned on an embankment’</i>. It also notes a <i>‘transition to lower landscape quality towards the western part of the ridge, from the M23 westwards, where the greensand ridge is traversed by a particular dense network of roads, and where the railway line cuts across the lower slopes’</i>. It goes on to highlight scattered roadside development and busy roads contributing to lower landscape quality in the South Nutfield and Redhill fringes.</p> <p>In terms of Scenic Quality, the Natural Beauty Assessment noted the positive effect of historic parkland influence on scenic quality in the Nutfield Prior area (page145), but it also noted a lower scenic quality towards the western part of EA10b in the M23/South Nutfield and Redhill Area (page 146) due to development and infrastructure.</p> <p>In terms of tranquillity the assessment noted <i>‘The western part of the ridge, close to the urban area of Redhill, the M23....is generally less tranquil.’</i> (page 146)</p> <p>Overall, the Natural Beauty Assessment Report concluded that <i>‘there is a lower weight of evidence towards the western part of the ridge, where the influence of the M23 corridor, the railway line, modern development, busy roads and adjacent urban areas is strong. The western part of the ridge, including land to the west of the M23 corridor, is therefore not included in the Candidate Area.</i></p> <p><u>Designation History and Extent of AGLV</u></p> <p>Natural England acknowledges that the land west of the M23 forms part of the AGLV and that it was also identified in part as land which qualified for AONB designation</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<p>woodland is dominant and brings a sense of wildness and outstanding natural beauty, especially to people living close by in an urban area.</p> <ul style="list-style-type: none"> • This landscape has a long-established and tranquil feel. • The landscape has visual scenic qualities that are over and above ordinary or attractive countryside. • Visually connected to the dramatic existing AONB to the north and provides views southwards across the Low Weald farmland. <p>Relative Wildness</p> <ul style="list-style-type: none"> • Handful of listed properties on the southside of the A25, this area is otherwise absent of urban influences. • Growing scrub and tall trees give a sense of enclosure, and remoteness from human habitation for the walker on the footpaths and the inter-connecting Greensand Way. <p>Relative Tranquillity</p> <ul style="list-style-type: none"> • There is a true sense of tranquillity at this high point, with a feeling of enclosure from the tree line surrounding it on all sides and the views stretching northwards and southwards. • There is a wonderful sense of remoteness and isolation. • This area is some distance from the M23 to the East and the A25 which runs along the north side but there is none, if any traffic noise. <p>Natural Heritage Features</p>	<p>within the Hankinson Duckett Associates assessment. Nevertheless, the Natural Beauty Assessment concluded that there is a mixed weight of natural beauty within this area and that these areas are fragmented by infrastructure and development and separated from the wider areas of qualifying land by the M23.</p> <p><u>Qualities of this area</u></p> <p>Natural England acknowledges that this area expresses a number of qualities including small scale historic pastures, elevated views such as from Bower Hill looking south, wooded character and association with the artist John Linnell. A review of the area in light of consultation responses highlights that:</p> <ul style="list-style-type: none"> • Natural beauty is highest in the northern part of the area where there are patches of ancient woodland and where the steep wooded slopes coupled with deeply incised narrow rural lanes give rise to higher scenic quality. • In this northern area there are two ridges which create a shallow valley comprising varied topography and a patchwork of woodland and small-scale pastures which gives rise to scenic compositions. • The ridges of higher land enable elevated scenic views southwards especially from Nutfield Priory and the Greensand Way west of South Nutfield. • The 17th and 18th century small scale field enclosure pattern comprising mature hedgerows and trees is intact west of South Nutfield. <p>Nevertheless, in places the small-scale pastures are under grazed comprising areas of rank grassland, thistle and scrub development eg in the area around Hillsbrow. Hedgerows and veteran trees also show signs of lack of management and where this occurs landscape condition is lower, reducing perceptions of scenic quality. Activity associated with South Nutfield and Priory Farm further reduces perceptions of tranquillity due to increased activity and altered landscape patterns.</p> <p>In the eastern part of the area and especially east and south of Cooper's Hill Road the landscape is significantly affected by the noise intrusion of traffic on the M23. The noise intrusion from the M23 is greater to the east of the motorway than to the west,</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<ul style="list-style-type: none"> This beautiful landscape is home to bats, owls, buzzards, sparrowhawks, deer and numerous insects and small mammals. It is a real haven to wildlife, flora, and fauna. <p>Cultural Heritage Features</p> <ul style="list-style-type: none"> The outstanding beauty of this area drew the artist John Linnell (1792-1882) Linnell painted views from this ridge. <p>BHLF-VUXE-WSK3-G This respondent wished to see the inclusion of the Greensand Ridge west of Fullers Wood Lane.</p> <p>Reasons are summarised as follows:</p> <ul style="list-style-type: none"> The area is less affected by noise from the M23 than land to the east of the M23 which is affected by prevailing winds. The evidence for including the area east of the M23 is weaker than the evidence for excluding land to the west. It is inconsistent to exclude land on the basis of noise and greater weight should be given to landscape value and accessibility. Association of the area with Linnell and Samuel Palmer. Minerals working at Hillsbrow is largely restored and this hill defines Redhill and forms its setting. Areas of ancient woodland on this hillside. Views to and from this hill should be protected. 	<p>due to prevailing winds, however it also affects land to the west, albeit to a lesser degree.</p> <p>Given the higher settlement density both within and adjacent to this area, the narrow lanes are relatively busy. Especially Sandy Lane/Hogtrough Lane due to Priory Farm and associated commercial activity and also Mid Street due to South Nutfield. Whilst there are many public rights of way across the area, this network is connected by sections of rural lane which are narrow and can be dangerous with fast moving cars and this detracts from perceptions of tranquillity, remoteness and an appreciation of scenic quality.</p> <p>Overall, the areas which have a higher weight of natural beauty are those areas where the topography is most pronounced (Hillsbrow, Stokers Hill, Pimlico Hill and Steners Hill) and thus those areas which lie in the north. However, these hills sit within a landscape containing urban fringe land uses on the edge of Redhill, the settlement of South Nutfield, and commercial activity at Priory Farm, such that the area feels fragmented. This is further reinforced by a lack of rural lane connections between this area and land to the east and the nature of the physical footpath connections under the M23 which are via underpasses that are unlit, long and uninviting.</p> <p>The Natural Beauty Assessment Report para 5.2.5 noted that <i>'Fragmentation may occur for example, where a landscape is physically separated by major infrastructure or development, or where land use changes have occurred such that landscape patterns and features have lost integrity. Where fragmentation is present, the degree to which it affects natural beauty depends on the fragmenting features, their visibility and the types of connections which remain between fragmented areas. Where fragmentation is present but does not significantly affect natural beauty overall, such areas may be included within the Candidate Area and may require particular scrutiny if taken forward. Conversely, individual discrete sites may be regarded as meeting the natural beauty criterion but when considered in the context of a wider area are in fact isolated pockets. A judgment must be reached as to the extent of the fragmentation of the landscape and whether the lesser quality areas prevent qualifying pockets from being included.'</i></p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<p>ANON-VUXE-WSQ2-N (Tandridge District Council) and ANON-VUXE-WEAP-N</p> <p><i>‘The AFA [Natural Beauty] assessment was incorrect (p139) in stating that the AGLV landscape designation only applied east of the M23. All of Nutfield parish west of the M23 and below the A25, and as far as Fullers Wood Lane, and south as far as the railway line was included in the AGLV (CSP20).</i></p> <p><i>West of the M23 the proposed extension includes the wooded Greensand Ridge and its southern escarpment. This is a heavily wooded area containing large stretches of Ancient Woodland (Ancient Woodland Inventory 2012), pasture land with scattered Parkland trees, rewilding farmland and several sudden and spectacular viewpoints. Woodland stretches almost continuously along the whole ridge summit, providing a visual and sound barrier to the A25. Steners Hill rises from a landscape that has been rewilding for over 30 years. Elsewhere, the landscape is undulating with a second lower escarpment above Brays Farm forming a geological feature derived from a prehistoric landslip. Much of the landscape preserves the old field and hedge patterns, with field boundaries identical or very similar to the 1844 Surrey Tithe map: for example, the farmland south of Lyttel Hall, and the field boundaries on Little Cormongers Farm. Here, there are many mature hedgerow trees, mainly oak, and scattered parkland trees. The landscape is as naturally beautiful as the pasture and parkland landscape elsewhere in the Godstone Hills extension.</i></p>	<p>It is Natural England’s view that the area of the greensand hills west of the M23 shows fragmentation and declining quality and that areas of higher quality are relatively small in extent. On this basis Natural England does not consider this area has sufficient natural beauty overall to be designated as part of the Surrey Hills AONB.</p> <p><u>Boundary</u></p> <p>Natural England notes that the boundary proposed by ANON-VUXE-WSQ2-N (Tandridge District Council). However, even if this area were considered of sufficient natural beauty for designation, it would be small in scale and physically isolation from the wider qualifying areas to the east. Its relatively small extent would not justify the washing-over of land east of the M23 and the M23 itself, in order to bring it in as part of a single Extension Area associated with the Godstone Hills.</p> <p><u>Conclusion</u></p> <p>No change.</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<p><i>The AFA [Natural Beauty] assessment talks of a “lower quality landscape where the Greensand Ridge is traversed by a particularly dense network of roads in the vicinity of South Nutfield and where the railway cuts across the lower slopes”. However, these roads, Coopers Hill Road, Mid Street and Fullers Wood Lane are typical of the pattern of narrow, deeply sunken north south lanes common through the rest of the Godstone Hills. Within Nutfield Parish all of the railway arches on the Redhill to Tonbridge line have height clearance issues. Consequently, there is very limited HGV traffic. In addition, the narrow sunken nature of the lanes helps to mitigate traffic noise.</i></p> <p><i>South Nutfield itself has grown over many years. In the 20th century there has been infilling, but the majority of its homes and limited facilities are built on land owned by a single developer, Sir Henry Edwards, from circa 1888 to 1905. Effectively, he zoned the development of the village with terraced and semi-detached homes north of Nutfield station, and south of it the larger detached homes. In addition, having secured the ownership of the local brick and tile works (alongside the station), he required builders to use materials from it. As a result, there is a unity of build types and materials throughout the village. It is cohesive and within a defined village boundary that does not look out of place as part of the view from the AONB.</i></p> <p><i>The AFA [Natural Beauty] assessment also talks of Priory Farm as an “incongruous feature”. Priory Farm</i></p>	

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<p><i>itself, mostly lying in the wooded valley between two escarpments has great natural beauty with lakes, meadowland, and ancient woodland. Indeed it is the beauty of the landscape that is at the heart of the Farm's business vision. The land is carefully managed precisely to retain that beauty - as a venue, for instance, for weddings. The "incongruity" presumably refers to the car park and the farm diversification businesses. The former is sensitively planned with new hedges and young trees screening the parking bays. The latter is screened by a high hedge along Sandy Lane. It is a thriving business: our argument is that natural beauty does not have to be compromised by an expanding business, and is not here.</i></p> <p><i>This proposed boundary revision is narrower in extent than the AFA [Natural Beauty] assessment, and therefore excludes some of the adverse elements mentioned in it, such as the Patteson Court landfill site, invisible here; and what was called "modern development along roads in the south Nutfield area". It is not clear to what this refers, but it is not within this proposed boundary extension.</i></p> <p><i>...undue weight is given to lack of Tranquillity. Local roads are relatively busy, as are many others within the AONB. In the case of the M23, relative tranquillity is undoubtedly impacted, but there is good tree cover and the hilly nature of the proposed extension cushions much noise from within the area proposed.'</i></p>	

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
<p>Whole of Vale of Homesdale (west of M23 and north of A25)</p>	<p>BHLF-VUXE-WSK3-G wished to see the inclusion of the whole of the Vale of Homesdale. Reasons given include:</p> <ul style="list-style-type: none"> • Area now restored to landscape of outstanding value. • Former mineral sites have led to a lasting legacy for residents. • Been established over last 30 years. • Well valued by local residents. • Mosaic of lakes and woodland. • Active minerals sites such as Nutfield Marsh Quarry and Patteson Quarry have been included as they will be restored in next 5-7 years. • Marshes create a context in which the North Downs are appreciated this adds weight and depth to the area. • Not possible to define where the AONB stops when looking south from Spynes Mere. • Stated vision to continue to improve the landscape. • Landfill site will be restored in next 5-7 years. • Westland area complements the rising hills. <p>The suggested boundary extends from the railway in the west, along Nutfield Road in the south, M23 in the east and edge of Mercers Country Park and urban edge to the north.</p>	<p><u>Commentary</u></p> <p>The reasons for including the Vale of Homesdale put forward by respondent BHLF-VUXE-WSK3-G are also reiterated by responses relating to the inclusion of Mercer Country Park. Inclusion of Nutfield Marsh Common and land along Cormongers Lane, all of which lie within the Vale.</p> <p>Natural England's detailed response to these individual areas can be found below and are collectively why Natural England does not consider the Vale of Homesdale to meet the Natural Beauty criterion.</p> <p><u>Conclusion</u> No change.</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
Inclusion of Mercer Country Park	<p>ANON-VUXE-WSQ2-N (Tandridge District Council)</p> <p><i>'The AFA Natural Beauty Assessment notes the "relatively degraded" condition of the Greensand Vale, mainly due to the strong influences of landfill and mineral extraction. However, the boundary extension we are proposing is a now restored landscape of lake and woodland where quarrying ceased many years ago. It is a settled landscape with hedges in good condition, isolated veteran trees and adjoining well managed arable farmland. Quarrying is ongoing at Mercers South. However, that quarrying site is well screened by extensive tree planting. The AFA assessment mentions noise from haulage lorries, but in the case of Mercers South, the haulage route to and from these workings is via the A25, not Nutfield Marsh Road. The AFA assessment also mentions the Patteson Court landfill site, due to close in 2030 as a dominant visual influence. However, around Mercers Park Lake, mature tree cover provides almost total screening.</i></p> <p><i>There are fine veteran oak trees in the landscape between Mercers Park and Spynes Mere. There are good views too to the chalk escarpment of the North Downs and the existing AONB.</i></p> <p><i>The M23/M25 interchange is already within the AONB. Traffic noise from nearby quarry workings is barely noticeable as the haulage route to and from these workings is via the A25. Vehicle access to the Patteson Court landfill site is not audible, positioned as it is at the top of Cormongers Lane. Nutfield Marsh Road provides part of the proposed boundary</i></p>	<p><u>Commentary</u></p> <p>As set out in the Natural Beauty Assessment Report designation history (page 13) the Surrey Hills AONB designation was made in 1958. The construction of the M25 (Reigate to Godstone) and M23 began in 1972 and resulted in the severance of the Spynes Mere area from the wider AONB. At the time of designation Spynes Mere was an area of lowland pasture. It became an area of sand quarry and was restored to nature conservation after-use in the mid 1990's. The site is now a wetland nature reserve managed by the Wildlife Trust. More broadly land west of the M23 is not an Area of Great Landscape Value (AGLV) save for its eastern edge close to the route of the M23. This also reflects the fact that the AGLV pre dates the construction of the M23.</p> <p>Land west of the M23 was initially included in the Area of Search and was assessed as part of EA10a in the Natural Beauty Assessment Report. The assessment noted that Mercer Country Park and the Moors Nature Reserve are areas of restored mineral extraction but that the wider area comprises a mixture of minerals activity and past land fill sites. Under scenic qualities it notes that <i>'the low lying area wetland landscape to the [north] east of Redhill is dominated by restored gravel pits, including the Moors Nature Reserve and Mercer's Country Park. At a local scale, there are scenic views across lakes and pools to woodland, wildflower meadows and pasture, with veteran trees. However, the landform has been significantly altered by human intervention, with extensive areas quarried for sand and gravel and more land earmarked for excavation. The existing Patterson County landfill site is a dominant visual influence on local views.'</i> The area was subsequently excluded from the Candidate Area.</p> <p>Natural England agrees that Mercers Country Park itself has been successfully restored to become an important expanse of open water and is actively used for outdoor recreation and that its scenic qualities are derived from the combination of open water with the backdrop of the chalk scarp in the distance. It is also acknowledged that the intervening development between the two is not visible in these views and that woodland surrounding the lake provides visual containment from adjoining landuses. Nevertheless, land between the Country Park and the current AONB boundary at Spynes Mere comprises open pasture fields which are</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<p><i>extension. It is well used, but traffic is restricted by virtue of a narrow width access point at Merstham, and an awkward junction with the A25 in Nutfield.</i></p> <p><i>The woodland and wetland habitat within Mercers Country Park is an important link for nature conservation and is connected both to the neighbouring Nutfield Marsh Local Wildlife Site at the west end, and to Spynes Mere within the AONB to the north east. Its designation as part of the Holmesdale Sandpits Complex SNCI is mentioned in the AFA Natural Beauty Assessment, which also describes it as “a successfully restored wetland habitat.”</i></p> <p><i>For the successfully restored lake at Mercers Park it is important to recognise that wetland habitats, and above all their connectivity, are crucial to the overall ecology of the Surrey Hills AONB, and are significant designated landscape features. The AFA [Natural Beauty] assessment did not give sufficient weight to the fact that this landscape is many years successfully restored, with fully grown trees, and shows little sign of the old quarry workings. It over emphasised the noise from current gravel workings, and gave undue weight to the visual intrusion of the Patteson Court landfill site, which is well screened by trees from this part of the Marsh area. It is also important to recognise that wetland habitats, and above all their connectivity, are crucial to the overall ecology of the Surrey Hills AONB, and are significant designated landscape features.’</i></p>	<p>significantly affected by the presence of the M23 which run on embankment to the east. Immediately to the north of the Country Park is a further area of restored land (now open water) and to the southwest active extraction sites and restored landfill. Natural England also acknowledges that the open water and woodland of the Country Park is part of a wider network of habitats.</p> <p>Given the context of Mercer Country Park, Natural England is of the view that whilst expressing some scenic quality it does not sit within a wider tract of qualifying land and that its landscape context lacks natural beauty, despite current and future potential for nature conservation. Natural England Guidance is clear that ‘<i>Natural beauty is assessed in terms of the current landscape, not some future potential for improvement. A rare exception may however apply where an existing initiative will deliver positive change of a standard which will meet the natural beauty criterion within the short term and for which there is a high degree of certainty that it will be achieved.</i>’ Whilst it is acknowledged that the general area is undergoing restoration which will deliver significant landscape improvement especially in terms of nature conservation, Natural England is not convinced that this will result in a landscape of a standard which meets the natural beauty criterion within the short term (Natural England Guidance Paragraph 6.10, last bullet).</p> <p>The Surrey Hills AONB Boundary Review has not included the assessment of natural beauty within the existing AONB – the inclusion of the M23/M25 interchange and land to the south and west reflects the fact that the boundary predates the construction of motorway infrastructure.</p> <p><u>Conclusion</u> No change.</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
Inclusion of Nutfield Marsh common	<p>A couple of respondents (ANON-VUXE-WSQ2-N (Tandridge District Council) and ANON-VUXE-WEV4-E (Reigate & Banstead District Council) requested the inclusion of Nutfield Marsh for the following reasons:</p> <ul style="list-style-type: none"> • Nutfield Marsh hamlet has several well scattered C17 cottages (Grade II) and an ancient Commonland, which collectively provide a sense of timelessness. • Nikolaus Pevsner describes this hamlet as a “genuine hamlet with a big rough green.” (The Buildings of England: Surrey). • Nutfield Marsh common land has remained unchanged for many centuries. • It is a very beautiful and tranquil area, much loved by walkers, bird watchers, cyclists etc. • It is a haven for wildlife and flora and fauna throughout the area. 	<p><u>Commentary</u></p> <p>Natural England acknowledges that Nutfield Marsh is an area of registered common associated with the hamlet of the same name and including a number of listed buildings at its south east corner. The common is in part used as a cricket pitch and otherwise comprises an area of rough grassland and scrub and is bisected by Nutfield Marsh Road. Natural England also acknowledge that this relic of historic landscape is relatively rare within the context of landscape change which has occurred in the wider area of the last 50 years and that it forms part of the wider wetland habitat jigsaw being established in association with Spyres Mere and the Wildlife Trust’s nature reserve stretching along the Redhill Brook eastwards to the Moors. Within this area, natural colonisation and succession is being allowed to take place however this does not alter the fact that the area of Nutfield Marsh and the wider wildlife sites sit within a landscape which has been significantly affected and contains ongoing land fill activity. As with Mercers Country Park, Nutfield Marsh common is not considered to sit within a wider tract of qualifying land and that its landscape context lacks natural beauty, despite current and future potential for nature conservation.</p> <p><u>Conclusion</u> No change.</p>
Land between Nutfield Priory and Mercer Park within Reigate and Banstead along Cormongers Lane (Nutfield Strip)	<p>ANON-VUXE-WEV4-E (Reigate and Banstead District Council)</p> <p>We understand that Tandridge Borough Council are proposing the inclusion of land around Nutfield. We would support this but request that the boundary is extended slightly into Reigate and Banstead and takes account of strips of land that include Mercers Lake, Land up to Cormongers Lane and existing AGLV to the south of the A25 in Reigate & Banstead.</p> <p>Reasons given for the inclusion of this area include:</p>	<p><u>Commentary</u></p> <p>Natural England understands that the proposed additional area for designation put forward by Reigate and Banstead is dependent on the inclusion of land put forward by Tandridge District Council. As noted above Natural England does not consider that Mercer’s Park or land south of the A25 at Nutfield Priory should be included within the proposed extension to the Surrey Hills AONB for the reasons given.</p> <p>Furthermore, it is understood that Tandridge District Council is not proposing that the AGLV south of Mercer’s Park is included in any AONB extension and therefore the area called ‘Nutfield Strip’ put forward by Reigate and Banstead would form a narrow</p>

Boundary		
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	<ul style="list-style-type: none"> • When looking eastwards from Mercers Lake there is a clear relationship between the exiting AONB in the east and Nutfield. • The southern most part of the proposed addition is already designated as Land of Greater Landscape Value (AGLV) which connects with the Tandridge area of AGLV. • From Cormongers Lane towards Nuffield, there is historic farmland interspersed with areas of woodland. • To the West of Cormongers Lane is a Local Nature Reserve linked to Mercers Lake which has helped to significantly improve wildlife in the proposal area. • There is still some finishing off work continuing at the BIFA landfill site to the west which is scheduled for closure within a few years. Some planes are evident as elsewhere in the AONB at c8,000ft or above. Generally, though in the countryside and around or on the lake it is very tranquil. • The distant landscape is agrarian in character whilst the northern areas have been subject to quarrying and land restoration. • The area has been subject to minerals working but that has long ceased and land restoration has had time to heal the wounds both to the built form with the introduction of lakes and habitat improvements. 	<p>strip of land along Cormongers Lane (including adjacent woodland) and would sit between two areas of non-qualifying land (comprising restored and active landfill). Natural England does not consider that this area has outstanding natural beauty, despite views north and south to the existing AONB chalk scarp or rising land to the south of the greensand hills.</p> <p>Natural England Guidance is clear that <i>'Natural beauty is assessed in terms of the current landscape, not some future potential for improvement. A rare exception may however apply where an existing initiative will deliver positive change of a standard which will meet the natural beauty criterion within the short term and for which there is a high degree of certainty that it will be achieved.'</i> (Paragraph 6.10 last Bullet). Whilst it is acknowledged that the general area is undergoing restoration which will deliver significant landscape improvement especially in terms of nature conservation, Natural England does not consider that this will result in a landscape of a standard to meet the natural beauty criterion within the short term.</p> <p><u>Conclusion</u> No change.</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
Request for Exclusion of Areas		
Exclude land north of Hart's Lane and north of Miles Lane and New Road	<p>ANON-VUXE-WEXR-E requested the exclusion of land north of Hart's Lane and north of Miles Lane and New Road. The reasons are summarised below:</p> <ul style="list-style-type: none"> • Inclusion of only limited areas of transitional land south of the Wooded Greensand Hills Landscape Character Type within the Godstone Hills proposed Extension Area. • The draft Tandridge Local Plan 2033 (July 2018) and Regulation 22 submission (January 2019) identifies South Godstone as the broad location for a new garden community that would deliver 4,000 homes. • Particular consideration has been, and continues to be given, to the mitigation of potential adverse landscape and visual effects arising from development as well as to identifying potential measures that could contribute positively to the character and qualities of the area in the long term through good design and the governance and management of environmental assets. • Policy in the National Planning Policy Framework and in the current AONB Management Plan highlight the importance of the setting of the AONB. Furthermore, the Desirability Assessment for the Godstone Hills Candidate Area states that the duty to conserve and enhance the natural beauty and special qualities of the AONB applies to 	<p><u>Commentary</u></p> <p><u>Withdrawal of Tandridge Emerging Local Plan</u> The emerging Tandridge Local Plan was at an advanced stage (Reg 22) however in Aug 2023 the Inspector concluded that the plan was unsound.</p> <p>Where there is an existing planning permission or allocation for development close to the boundary, this land is generally excluded, in accordance with Natural England Guidance. However, there is currently no know planning application or permission in the vicinity of the proposed boundary. Natural England acknowledges that prior to the submission of the Designation Order to the Secretary of State there may be changes to planning circumstances. Should this be the case Natural England will review and update judgements accordingly.</p> <p><u>Potential harm arising from development</u> Wording in the National Planning Policy Framework (NPPF) relating to the setting of an AONB (para 182) relates to an area <u>post</u> designation and specifically the <u>purposes of designation</u>, not the evaluation of land for designation or the definition of a boundary.</p> <p><u>Transitional Nature of the Landscape</u> The Natural beauty of land north of Hart's Lane and north of Miles Lane and New Road is set out above under Inclusion of land up to the Tonbridge to Redhill railway line.</p> <p><u>Boundary drawn more closely to the greensand ridge</u> Natural England does not agree that the boundary should be pulled back to the north of Hart's Lane and along the upper slopes of the Greensand Hills. This would result in the exclusion of land which is considered to meet the natural beauty criterion. The proposed boundary is drawn within the transitional landscape, at the higher quality end and follows a clear feature on the ground (Hart's Lane).</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<p>areas that fall within its setting. The [consultation] documentation is less clear on the potential for harm arising from development and land use change in the setting of the AONB within the Low Weald Farmland LCT, south of the Wooded Greensand Hills LCT.</p> <p>Suggested Boundary The alternative boundary proposed for the extension is drawn to more closely follow the distinctive topography of the wooded ridge between the western edge of Tandridge and Oak Pollard with the purpose of excluding areas of transitional land that do not demonstrably contribute to natural beauty.</p> <p>The alternative boundary alignment follows the edge of woodlands, field boundaries, lanes and roads and the Greensand Way. In small stretches, the alternative boundary follows Gibbs Brook and tributary streams. All features defining the alternative boundary are on Ordnance Survey 25k mapping.</p> <p>The alternative boundary alignment excludes lower lying transitional land and features (including a sewage works) that do not contribute to natural beauty. The alternative boundary excludes a small number of natural and cultural heritage features that can be regarded as contributing to natural beauty (a single Grade II listed milestone on west side of A22, small areas of ancient and semi natural woodland and established field patterns defined by well treed</p>	<p>In terms of the boundary north of Miles Lane and New Road, Natural England agrees that the sewage works does not contribute to natural beauty, however it does not consider the effect of this feature to have more than a localised impact on the qualities of the surrounding area, being set down within the folds of the landscape and surrounded by mature hedges. The higher land north of Stow Coppice and the associated traditionally managed meadows along Gibbs Brook, along with ancient woodland on steeper slopes, collectively contribute to the scenic qualities of this area and lift the natural beauty of land north of New Road. This was expressed in the Natural Beauty Assessment Report (page 159) which concluded '<i>There is a transition in landscape quality on the slopes of 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...care should be taken at the boundary setting stage to draw the boundary within the high-quality end of the transition in accordance with NE Guidance</i>'.</p> <p>The Candidate Area was drawn to include land north of New Road but did not extend as far as New Road itself. The Candidate Area has no outward boundary and therefore reflects land which is likely to meet the natural beauty criterion and within which a boundary can be drawn.</p> <p>At the boundary assessment stage Natural England proposed Miles Road and New Road for the boundary on the basis they are clearly defined features, and consistent with the use of Hart's Lane to the west. However, a review of the evidence and further site work has revealed that this boundary is drawn more towards the lower end of the transition. An alternative boundary has therefore been sought further to the north. Care has been taken to include those parts of the Gibbs Brook, associated meadows and woodland where the landscape is more topographically varied and scenic quality is higher. An alternative boundary has been identified which utilises hedges and the edge of woodland, and which more accurately reflects qualifying land, ensuring the boundary is drawn within the high quality end of the transition. It is accepted that this alternative boundary is more convoluted as a result.</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<p>hedgerows). However, on the whole it is judged that these features do not contribute sufficient natural beauty to warrant the inclusion of this area.</p> <p>Excepting the area around the sewage works, the proposed alternative boundary alignment closely follows the boundary of the AONB Candidate Area (Policy TLP34 in the Local Plan Policies Map 2018).</p>	<p>Natural England therefore proposes a small reduction in the area to be included within the proposed Extension Area.</p> <p><u>Conclusion</u> Minor deletion to remove the lower quality land within the transition.</p> <p>(Deletion 8 – Refer to Figure 24a)</p>
<p>Exclusion of allocated land Lambs Business Park and exclusion of Maple Wood and field parcel to the west (formerly Seven Acre Wood)</p>	<p>ANON-VUXE-WSKZ-Q provided a detailed response which has been summarised below:</p> <p>Natural Beauty</p> <p>Land proposed for designation was considered to not meet the natural beauty criterion. A summary of the reasons are as follows:</p> <ul style="list-style-type: none"> • Lambs Business Park contains large incongruous features which affect land adjacent. • It is an allocated site for a waste facility in the Surrey Waste Plan. • Area is not tranquil due to the railway, business park and hydrocarbon extraction facility to the southeast. • Maple Wood is relatively recently planted and not ancient. • No designated heritage assets. • Includes land which forms part of the business park – live railway siding. <p>Desirability</p>	<p><u>Commentary</u></p> <p><u>Planning</u> Reference to Surrey Waste Local Plan Part 2 ILAS and Site Allocations (Dec 2020) shows the Lamb’s Business Park as an allocated site TA10 although the mapped boundary on page 65 is noted as indicative. The assessment concludes the site is ‘suitable for a full range of potential waste management facilities’ and ‘based on the findings of the HRA for the plan the site may be suited for a small, medium or large-scale thermal treatment facility’. Under landscape it notes that ‘The Surrey AGLV designation commences immediately to the north of the site, and the site is sensitive in terms of landscape character and visual amenity’. Lambs Business Park is also a Strategic Employment Site within the Tandridge Core Strategy (Oct 2008).</p> <p>Although the emerging Tandridge Local Plan was at an advanced stage (Reg 22) during the assessment process, it has in August 2023 been found unsound by the Inspector. Policies and allocations found within that plan are therefore no longer a current material consideration. Natural England has therefore based its review of the Lambs Business Park site on this basis. Natural England acknowledges that during the course of the designation process this situation may again change and may require further review.</p> <p><u>Candidate Area</u> The Candidate Area reflects the area of land which is likely to qualify for designation. Some land south of the railway was identified in the Natural Beauty Assessment Report as having scenic quality (pages 145-146) where the landscape flows over the</p>

Boundary		
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	<p><i>'only subareas 10a and 10b satisfied the NB [Natural Beauty] criterion. These areas are located to the north of the Tonbridge to Redhill Railway Line. Refined Evaluation Area 10e is not listed as an area where the Natural Beauty criteria had been met.'</i></p> <p>Boundary</p> <p>Amending the boundary to the longstanding physical feature of the railway line, would provide a strong southern boundary for the AONB. The boundary should exclude Maple Wood and field to the west and follow the AGLV boundary along the railway line.</p> <p>Land south of the railway should not have been included in the boundary because it does not meet the natural beauty criterion and did not form part of the 'desirability to designate assessment'.</p> <p>The boundary could follow the eastern edge of Four Acre Wood and South Park Lane as these are more definitive and permanent boundaries.</p> <p>The proposed boundary could provide an additional level of complexity to WT Lamb's proposals to amend the current restoration scheme as part of accommodating the forthcoming waste management facility.</p> <p>Proposed boundary may undermine the longer-term development aspirations which form part of the Development Plan especially in relation to development which would fall within the setting of the AONB.</p>	<p>railway which is in a tunnel. Page 157 of the Natural Beauty Assessment Report also highlights that south of the tunnel the natural beauty is relatively strong. It states that <i>'lower slopes of the greensand ridge extend across the tunnelled railway line. Here there is a distinctive and scenic landscape with an intact historic landscape pattern which is an integral part of the undulating greensand ridge'</i>. Furthermore, this area was included within the Candidate Area. Natural England therefore disagrees that the assertion that land south of the tunnel was not considered to meet the natural beauty criterion. Natural England also disagrees that the AGLV accurately reflects natural beauty in this area.</p> <p><u>Implications of designation on delivery of current planning allocations</u></p> <p>Natural England does not consider that the proposed boundary extension will have a material impact on the implementation of Policy 11a and Site Allocation TA10 of the Surrey Waste Local Plan 2019-2033 waste management facilities expected at Lambs Business Park. Natural England acknowledges that designation of land as AONB requires great weight to be given to conserving and enhancing landscape and scenic beauty (National Planning Policy Framework 2023 para 182) and that development in their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas.</p> <p>In the absence of detailed proposed amendments to the current restoration scheme or detailed proposal regarding the waste management facility, Natural England is of the view that the proposed designation of land to the west of the site does not demonstrably undermine the longer-term development aspirations of the site. Designation does not preclude adjacent development but requires developers to give additional consideration to mitigation and design as indicated by respondent ANON-VUXE-W5UR-U (Surrey County Council).</p> <p><u>Implications of designation on defective functioning of the railway</u></p> <p>Natural England notes that there are many sections of railway within the existing Surrey Hills AONB and that this does not impede their effective operation. It also notes that major development is permitted within nationally protected landscapes</p>

Boundary		
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	<p>Future management of the railway may mean the woodland edge may be subject to change.</p> <p>The boundary should accord with the AGLV and follow the railway.</p> <p>A further late respondent stated: <i>'We are keen to ensure that the effective functioning of the railway is not negatively impact by the proposed expansion. Alternations and restriction which makes development of opportunities at the Godstone site [Lamb Business Holdings] more challenging and renders rail-freight traffic development less likely form this connected site cannot be supported. The inclusion of the area highlighted in red [south of the tunnel] could impact on the functioning of rail-freight and make this far more challenging to deliver. It would appear that there is little evidence provided by the consultation material which takes this issue of waste management and the use of rail freight into account.'</i></p> <p>In contrast ANON-VUXE-W5UR-U (Surrey County Council) response to the Godstone Hills extension expressly states in relation to Lambs Business Park that <i>'As the Minerals and Waste Planning Authority for the county, the council does not consider that the proposed and further county council suggested extension areas are likely to have a material impact on the steady and adequate supply of minerals or the provision of sufficient waste management facilities. This includes the impact of the proposed Godstone</i></p>	<p>where there are exceptional circumstances and if it is in the public interest (National Planning Policy Framework 2023 para 183). Network Rail also makes the point 'As a statutory undertaker, any necessary works should be exempt from restrictive designation or policies which impact on the safe and efficient running of the railway'. Natural England agrees and does not consider that the proposed boundary should materially affect the effective functioning of rail-freight or waste management at the Lambs Business Park. This concurs with the view of respondent ANON-VUXE-W5UR-U (Surrey County Council).</p> <p><u>The Boundary</u></p> <p>Natural England acknowledges that an alternative boundary could follow South Park Lane and then Four Acre Wood as suggested by respondent ANON-VUXE-WSKZ-Q but this would exclude Maple Wood which is a part of the wider setting and parkland landscape associated with South Park.</p> <p>Natural England has reviewed whether Maple Wood should be included within the boundary as a feature on the edge. It is acknowledged that not all of the woodland is ancient and that there has been more recent plantation woodland to the southeast, however the whole of the woodland is a Site of Nature Conservation Interest (SNCI) and the proposed boundary follows the edge of the woodland designation.</p> <p>Natural England has reviewed concern that the proposed boundary includes an area of railway siding which forms part of the business park. Reference to Mastermap indicates that the railway siding is not included in the boundary. However, Natural England acknowledges that the proposed boundary does include the railway embankments on the eastern side of the tunnel. On reflection Natural England considers that a more robust boundary can be drawn along the edge of woodland at the top of the embankment and a minor refinement to the boundary is proposed in this location.</p> <p>The railway line is in a tunnel in this area and Natural England notes that good practice in boundary making from Ordnance Survey indicates that <i>'in no case should roads etc carried on viaducts or running in tunnels be used for boundaries'</i>. The</p>

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	<p><i>Hills extension in EA10e on the future development of Lambs Business Park for waste management uses, albeit that greater emphasis will need to be placed on sensitive design and mitigation in respect of landscape and visual impact.</i></p> <p><i>The council is, however, aware that the owners of Lambs Business Park are concerned about the potential implications of the extended AONB boundary on its future development in relation to the implementation of Policy 11a and Site Allocation TA10 of the Surrey Waste Local Plan 2019-2033 and trusts that Natural England will carefully consider the concerns raised by WT Lamb Holdings (letter from LRM Planning Ltd Ref. NM/13.106).'</i></p>	<p>Natural Beauty Assessment Report noted the transitional nature of the landscape and defined the Candidate Area as far as the Salford Stream. Natural England has reviewed the area south of the railway tunnel which have been included in the proposed extension and considers that the boundary has been drawn within the transition but notes that an alternative more conservative boundary could be adopted which follows the northern edge of woodland, a track and field boundaries. This would enable the majority of features associated with South Park to be included (including the historic farmstead on Cuckseys Lane), removes more transitional landscape to the south and addresses issues associated with the railway.</p> <p><u>Conclusion</u> Minor deletion and refinement of the boundary in the vicinity of the Bletchingley railway tunnel.</p> <p>(Deletion 9 – Refer to Figure 24a)</p>