

Appendix 15: Limpsfield

Please refer to Figure 23a

Overview

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

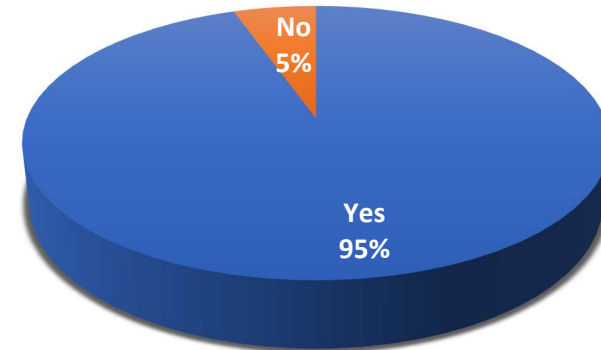
Natural Beauty	Responses
Yes	35
No	2
Not sure	0

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

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

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

Limpsfield - Sufficient natural beauty to be designated



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

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

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

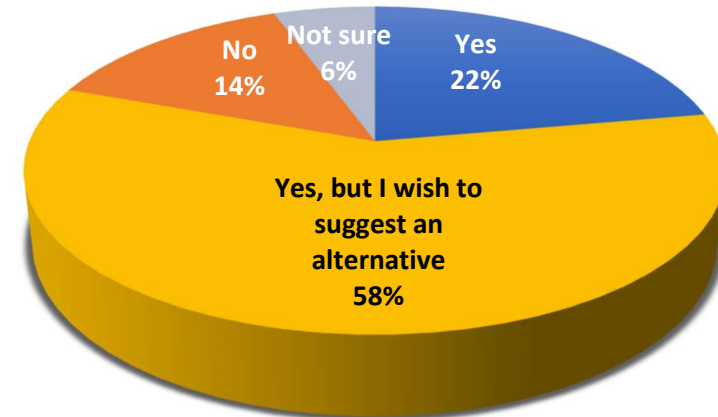
Many of the responses made similar points and revisions to the boundary focused on its southern extent. A number of the responses were identical.

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

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

There are no requested exclusions.

Limpsfield - Agreement with the proposed boundary



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

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

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>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-WS1M-G <i>'[Anon] fully support the extension of the AONB at Limpsfield...'</i></p> <p>ANON-VUXE-WMUS-M <i>'I agree with the proposal to extend the area as Natural England has set out.'</i></p> <p>ANON-VUXE-WM6H-A <i>'The proposed boundary is a sensible suggestion.'</i></p> <p>ANON-VUXE-WMN1-B <i>'It includes areas of natural beauty that are worthy of added protection.'</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		
Include land further to the south as far as the east-west railway line and including Honesland Wood, Merle Common, Earls Wood and	<p>ANON-VUXE-WE74-F/WSQN-H (Tandridge District Council) and ANON-VUXE-WES1-8, ANON-VUXE-WEJ4-2, ANON-VUXE-WEKG-P, ANON-VUXE-WEZJ-8, ANON-VUXE-WE11-6, ANON-VUXE-WENV-8, ANON-VUXE-WS1P-K, ANON-VUXE-WERX-E, ANON-VUXE-WECX-Y, ANON-VUXE-WEXW-K, ANON-VUXE-WEQH-W, ANON-VUXE-WERK-1, ANON-VUXE-WED9-1,</p>	<p><u>Commentary</u></p> <p>The Natural Beauty Assessment considered this area as part of EA10c. The assessment highlighted that the landscape is in transition from the more elevated and undulating landscape associated with the greensand hills to the gently undulating and wooded landscape of the Low Weald. In particular, and in relation to the southern part of the EA10c it noted the ancient woodland, natural and cultural heritage and good condition of features but it also noted the larger scale field pattern, increased incidence of arable farming and loss of longer distance views. Overall, it concluded that <i>'To the south and east, where the landscape is in transition, becoming more open and less</i></p>

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

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Natural England Commentary</u>
	<p>Other respondents cited the need to provide better planning protection to the land for example respondent ANON-VUXE-WEZJ-8 stated that:</p> <p><i>‘Gaywood Farm has submitted plans (see 2022/1240 on Tandridge DC Planning website) to build 42,000 solar panels on 61-acres of land just a few hundred metres from Staffhurst Wood - woodland that has been classed as a Site of Special Scientific Interest. Including the whole area in the AONB would give it better protection.’</i></p> <p>Boundary The proposed boundary extends along Red Lane and Dwelly Lane as far as the railway, then turns east for a short distance before adopting a footpath and then Grants Lane and then Monks Lane then Guilables Lane and then a track heading east as far as the Kent Downs AONB boundary.</p>	<p>sweet chestnut and aspen and are particularly valued for their display of bluebells in Spring. Natural England recognise that this woodland is regarded as peaceful, tranquil and visually appealing and is of importance to local residents.</p> <p>When defining the boundary, the Boundary Considerations Report directly addressed the issue of the transitional landscape stating <i>‘The second issue related to the transitional quality of the landscape in the south, as the landscape progresses from the steep, and sometimes convoluted, slopes of the greensand hills, to the lower lying (although still undulating) slopes of the Low Weald. This transition is reflected in a gradual reduction in elevated views, less frequent ancient woodland and an increase in arable cultivation, such that landscape qualities are declining. The natural beauty assessment highlighted the need for particular scrutiny at the boundary setting stage, to define the boundary within the transition.’</i></p> <p>It went on to state <i>‘In terms of defining the southern boundary to this area, consideration was given to the transitional nature of the landscape. A boundary was identified within the transition, enabling the steepest slopes and historic settlement, to be included along with wooded shaws and Itchingwood Common. The boundary adopts rural lanes within the transition wherever possible.’</i></p> <p>Natural England Boundary Considerations Report also address ‘features of interest’, such as Staffhurst Wood, stating that <i>‘Areas and features of wildlife, geological, geomorphological, historic, cultural or architectural value which are situated on the margins of a National Park/AONB should be included where practicable providing that they are situated within a tract that meets the statutory criteria.’</i></p> <p>In reviewing this area Natural England is of the view that Staffhurst Wood forms part of a transitional landscape from the greensand hills. Natural England also considers that the proposed boundary is drawn conservatively within the transition, that Staffhurst Wood lies on the margins of the transition, and that the proposed boundary follows clear features on the ground (predominately lanes) and is consistent with the definition of the Kent Downs National Landscape to the east.</p>

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

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Natural England Commentary</u>
		<p><u>Conclusion</u> Addition to include land to the south, including Staffhurst Wood.</p> <p>(Addition 12 – Refer to Figure 23a)</p>
<p>Inclusion of land south of the railway including as far as the River Eden and High Weald</p>	<p>ANON-VUXE-WEBR-R, ANON-VUXE-W5MG-8, ANON-VUXE-WS1P-K, ANON-VUXE-WS1N-H, ANON-VUXE-WEJ4-2 requested the inclusion of land as far as the High Weald National Landscape (AONB).</p> <p>Similar submissions were also made in relation the proposed extension of Godstone (refer to Appendix 16).</p> <p>Many framed their arguments in relation to the opportunity to forge a connection to the High Weald and made reference to:</p> <ul style="list-style-type: none"> • Surrey Biodiversity Opportunity area of the River Eden and tributaries • 2019 Glover Review – 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>Respondents also gave reasons why the area is considered to meet the natural beauty criterion.</p> <p>Natural Beauty</p> <ul style="list-style-type: none"> • Gently undulating farmland 	<p><u>Commentary</u></p> <p>Arguments which have been put forward in relation to opportunities for nature recovery have been considered under desirability which can be found in Appendix 2.</p> <p><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. BOAs identify the most important areas for wildlife conservation remaining in Surrey. The aim of Biodiversity Opportunity Areas (BOAs) is to establish a strategic framework for conserving and enhancing biodiversity at a landscape scale, making our wildlife more robust to changing climate and socio-economic pressures. Natural England notes that whilst this area indicates nature conservation interest and opportunities for enhancement, it does not equate to a wider tract of land which has natural beauty. Natural England Guidance is clear that natural heritage must contribute to an appreciation of the natural beauty of the landscape. Natural England therefore does not consider the presence of the River Eden BOA as a justification for including this part of the Low Weald within the proposed boundary extension. Furthermore, the assessment of natural beauty is based on the current condition of the landscape not on future potential (para 6.10 last bullet of Natural England Guidance).</p> <p>The issues identified in the Natural Beauty Assessment were not the absence of landscape features but rather that this landscape, although attractive, lacked the qualities that made it nationally outstanding. The Natural Beauty Assessment Report noted the transitional nature of the landscape south of the greensand hills. The lower lying nature of this landscape and its well wooded character means that much of it lacks visual connectivity to the greensand hills to the north or chalk scarp, within the existing</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Natural England Commentary</u>
	<ul style="list-style-type: none"> • High concentrations of important wildlife habitats • Well maintained landscape • Quiet country lanes • Sparce settlement • Views from elevated points to the North Downs and High Weald • Staffhurst Wood SSSI (ancient bluebell woodland) • Peacefulness • Dark night skies • Old farmhouses and listed buildings • Small brooks feeding the River Eden • Ancient bluebell woodland • Diverse wildlife • Benefits set out in Surrey County Landscape Character Assessment have been ignored <p>Desirability Respondents cited the need to fulfil Government's National Policy on 'joining up' protected areas, and enriching wildlife value.</p> <p>ANON-VUXE-WEJ4-2 <i>'I believe to ensure species biodiversity long-term we should create an uninterrupted AONB that extends to the High Weald.'</i></p> <p>ANON-VUXE-WES8-F <i>'I support the proposed extension of the Surrey Hills AONB but the Limpsfield boundary should be</i></p>	<p>AONB beyond. Natural England Guidance on defining boundaries notes that where there is a transition in natural beauty the boundary should be drawn towards the high-quality end of the transition. It goes on to state that <i>'Visual associations may also be used to help define the extent of land for inclusion in these circumstances.'</i></p> <p>Natural England notes that concerns are raised regarding perceived lack of consideration of evidence contained within the Surrey County Landscape Character Assessment. This area is classified as part of the Low Weald Farmland landscape type and an extensive area of low weald farmland called Horley to Swaynesland Low Weald Farmland. The assessment highlights that the area is defined by the change in the underlying geology to the north from clays to greensand. Boundaries between character areas are recognised as not hard and fast boundaries but reflect gradual changes in character.</p> <p>The proposed boundary takes account of changes in character and quality of the landscape. The natural beauty assessment makes it clear that the south side of the greensand ridge is in transition and that the defining qualities of the greensand ridge become less pronounced moving south.</p> <p>Natural England has reviewed this area following consultation responses and has concluded that the area comprises attractive and generally unspoilt tranquil countryside with few landscape detractors. This is not unusual in the Low Weald.</p> <p>Natural England considers that the judgement to exclude the wider area and to not extend further south than Staffhurst Wood (as noted above) is sound. The wider swathe of Low Weald landscape between the railway and High Weald AONB, whilst including attractive countryside, is not of national significance. Furthermore, south of the railway the visual links of this area to the Surrey Hills are not strong, with views focusing more to the south and the High Weald National Landscape or to the east to the Kent Downs National Landscape.</p> <p>This wider area, south of the greensand hidge is not strongly associated with the core areas of the Surrey Hills. Natural England agrees with respondents who note that <i>'the area running south to the Eden Brook and the boundary of the High Weald AONB is not</i></p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Natural England Commentary</u>
	<p><i>extended southwards so as to be consistent with national policies to make protected areas 'bigger, better and more joined up' and to increase the quality and quantity of wildlife.'</i></p> <p>ANON-VUXE-W5MG-8 <i>'The candidate area is not large enough in scope. I am concerned that there has not been sufficient regard paid to the recommendations of the 2010 Lawton review and the 2019 Glover report.'</i></p> <p><i>'It appears that national policies on connectivity and increasing the quality and quantity of wildlife in AONBs have been ignored. This should be remedied by extending the boundary southward to join the High Weald AONB East of Lingfield and to the Eden Brook to the west, thus taking in the bulk of the River Eden Biodiversity Opportunity Area and the Blindley Heath and Staffhurst Wood SSSIs.'</i></p> <p>Boundary</p> <p>Eastern boundary to follow the Tandridge Border path – Country boundary and southern boundary to Eden Brook and Ray Brook.</p>	<p><i>as visually spectacular as much of the landscape to the north' (ANON-VUXE-WEBG-D). The fact that this landscape has not been identified as AGLV (local landscape designation) in the past, strengthens this view.</i></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>Conclusion No change.</p>