

## Appendix 16: Godstone Hills

Please refer to Figure 24b

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

### Overview

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

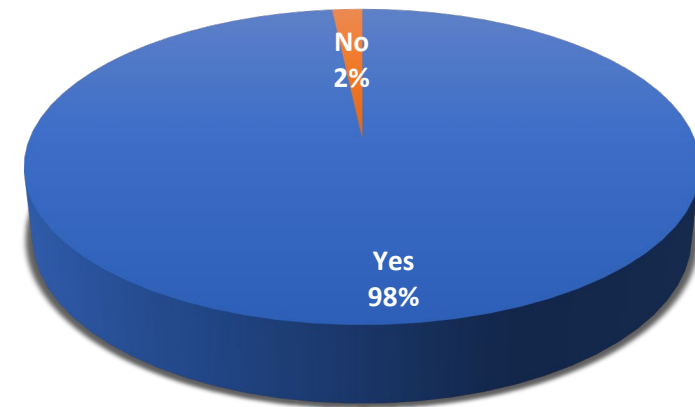
Natural Beauty	Responses
Yes	115
No	2
Not sure	0

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.

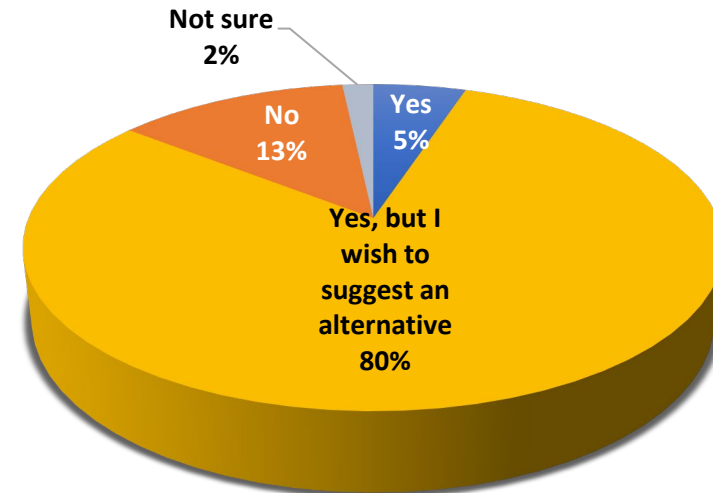
The additional areas of land that respondents wish to see include within the proposed extension are:

- 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



During the second (2024) statutory consultation, responses were received regarding **Addition 13: The Bogs** and **Addition 14: Land at Oxted Mill** as well as **Deletion 8: Land north of New Road** and **Deletion 9: Land south of South Park**. Natural England has reviewed these responses and provided further commentary in blue below.

Additional responses were also received relating to **High Weald geodiversity corridor, northeast of White Post, and land between Tandridge Hill Lane and Oxted**. Natural England has reviewed these areas and provided further commentary in blue below.

Natural Beauty		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
<b>The proposed extension meets the Natural Beauty Criterion</b>	<p>Many respondents agreed that the proposed extension met the natural beauty criterion.</p> <p><b>ANON-VUXE-WMWW-T</b>  <i>'This area forms part of the foreground to dramatic sweeping views northward to the North Downs.'</i></p> <p><b>ANON-VUXE-WMZG-D</b>  <i>'Yes - beautiful scenery, tranquillity and natural wildlife (many species of bird, wild rabbits and deer to name a few).'</i></p> <p><b>ANON-VUXE-WEXR-E</b>  <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><b>ANON-VUXE-WEQ5-A</b>  <i>'The answer here is clearly 'Yes', the area fulfils many of the 6 tests of natural beauty'.</i></p> <p><b>ANON-VUXE-WEWV-H</b>  <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><b>ANON-VUXE-WM4K-B</b></p>	<p><b><u>Commentary</u></b></p> <p>Natural England agrees that land within the proposed Extension Area meets the natural beauty criterion for designation as AONB and that additional evidence provided by respondents supports the findings of the Natural Beauty Assessment 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>
	<i>'It has outstanding landscape with distinctive character and natural beauty'</i>	
<b>The proposed extension does not meet the Natural Beauty Criterion</b>	<p><b>ANON-VUXE-WMWH-B</b> considered the area to not meet the Natural Beauty Criterion, although no justification was given.</p> <p><b>ANON-VUXE-WMPQ-D</b> considered that the proposed extension did not meet the natural beauty criterion for the following reasons:</p> <ul style="list-style-type: none"> <li>• The area is predominantly covered by farms, livery yards and rural housing.</li> <li>• The area has no specific or distinctive features which mean it should be designated as an area of outstanding natural beauty.</li> <li>• If all countryside such as this should be classified as AONB, then the majority of the UK countryside would also have this classification.</li> <li>• 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.</li> </ul>	<p><b><u>Commentary</u></b></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		
Theme	Representations	Natural England Commentary
General agreement with proposed boundary	<p>A number of respondents agreed with the proposed boundary simply answering yes to the consultation question and providing no additional information. Some did provide additional commentary including:</p> <p><b>ANON-VUXE-WEBC-9</b>  <i>'I would certainly wish to support the proposed southern boundary extension of the AONB for the Godstone Hills .....The area in question deserves to be preserved for its beauty and for the benefit of the local community.'</i></p> <p><b>ANON-VUXE-WEGZ-D</b>  <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><b>Commentary</b></p> <p>Natural England notes the support for the proposed boundary and has provided a detailed commentary to the boundary issues raised by other respondents, which can be found below.</p>
Requests for Additional Areas		
Land between M25 Junction 7 and 6	<p><b>ANON-VUXE-WEV7-H</b> 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><b>Commentary</b></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>Representations</u>	<u>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><b><u>Conclusion</u></b> No change</p>

Boundary		
Theme	Representations	Natural England Commentary
<b>Include Stoney Field and The Bogs</b>	<p>A significant number of respondents provided evidence to support the inclusion of Stoney Field and The Bogs to the northwest of Oxted including <b>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.</b></p> <p>Evidence was often the same and used similar wording. The reasons put forward have been summarised as follows:</p> <p><b>Natural Beauty</b></p> <ul style="list-style-type: none"> <li>• Stoney field is a beautiful field with stunning sweeping views of the north downs.</li> <li>• Foreground to the dramatic North Downs.</li> <li>• There are beautiful bluebell woods on two edges of the field.</li> <li>• The Bogs is a Site of Nature Conservation Interest and an area of ancient wet woodland, rare in Surrey. This area has a</li> </ul>	<p><b>Commentary</b></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		
Theme	Representations	Natural England Commentary
	<p>high degree of relative wildness – close immersive connection with nature.</p> <ul style="list-style-type: none"> <li>• These two lovely areas .... are no different to the areas around it which are now AONB.</li> <li>• Stoney Field and The Bogs blend seamlessly with the north downs and surrounding area and is no different.</li> <li>• Spectacular after snowfall as it is in spring, summer and autumn colours.</li> <li>• Field abounding in flints.</li> <li>• Mature tree belts around Blunt House (listed building).</li> <li>• Incorrect reference to allotments.</li> </ul> <p><b>Boundary</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Follow the line of Green Belt.</li> <li>• Oxted Line railway serves as a very well defined eastern boundary, with the churchyard and cemetery doing the same to the south.</li> <li>• A boundary can be defined which follows the railway, grave yard and settlement boundary as defined in the Tandridge Local Plan.</li> <li>• The proposed boundary does not follow the Green Belt boundary.</li> </ul>	<p>Green Belt boundary was not considered appropriate as this does not always follow a clear feature on the ground.</p> <p><b>Conclusion</b></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 23b)</p>



Boundary		
Theme	Representations	Natural England Commentary
Support for proposed Addition 13: The Bogs	<p>191 respondents agreed with the designation of Addition 13, many reiterating evidence previously submitted and some providing further reasons for their view. Examples of responses are as follows:</p> <p><b>ANON-PQ5Q-KRHH-M (Tandridge District Council)</b>  <i>'Tandridge District Council supports the inclusion of this area as defined in Figures 12b and 24b of the Second Consultation Documents. We agree with the conclusions made by Natural England (Appendix 16: Godstone Hills Analysis Table) that Stoney Field and The Bogs form part of a sweep of landscape up to the settlement boundary and that Stoney Field affords dramatic views of the chalk scarp. We agree that this area has the same high-quality landscape as the existing AONB to the north and blends seamlessly with it. The Bogs is a noted natural heritage feature comprising ancient and deciduous wet woodland and a provisional Site of Nature Conservation Interest (SNCI).</i></p> <p><i>We are very pleased that Natural England has found a boundary which captures the extent of this very special area of qualifying land. Tandridge District Council wholeheartedly endorses this boundary amendment.'</i></p> <p><b>ANON-PQ5Q-KRT3-B</b></p>	<p><u>Commentary</u></p> <p>Natural England acknowledges the reasons given by respondents in support for this addition.</p> <p>5 respondents disagreed with the designation of Addition 13 those that provided a reason for their view are set out below.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>'[Anon] welcomed the proposed extensions of the AONB.</i></p> <p><i>The further additions now under consultation are also welcomed. In particular, it is noted that a number of parks and gardens of interest as non-designated heritage assets are affected. These include .....Blunt House (Limpsfield).'</i></p> <p><b>ANON-PQ5Q-KR4X-G</b></p> <p><i>'I support the addition of area A13 to the Surrey Hills National Landscape [AONB].</i></p> <p><i>The landscape quality is good in that when Stoney Field is viewed from the south and east there is a lack of incongruous elements while The Bogs is an unspoilt area of wet woodland and haven for wildlife. In terms of scenic quality, Stoney Field provides open views to the North Downs giving a real sense of space and change from the urban environment when approached from historically important St Mary's church or Wheeler Avenue. The view changes during the year as the crop on the field grows and is harvested giving walkers a sense of connection with the seasons. The open land provides a sense tranquility close to the burial ground and St Mary's: a great resource for many local residents.'</i></p> <p><b>ANON-PQ5Q-KR5E-X</b></p> <p><i>'The land at Stoney Field and The Bogs is a wonderful area of outstanding beauty closely linked and interchangeable with the existing AONB. This area is full of biodiversity and I have recently counted</i></p>	

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>34 species of birds which have a wonderful habitat in The Bogs. The views from Stoney Field to the North Downs are absolutely spectacular.'</i></p> <p><b>ANON-PQ5Q-KR9Z-Q</b>  <i>'This is quite an uncommon ecosystem in the area and supports a number of plants that require wet/damp conditions. This is especially important to preserve given the increasingly dry summers we are now experiencing.'</i></p> <p><b>ANON-PQ5Q-KRAV-U</b>  <i>'This area would be a natural addition to the Surrey Hills AONB. The area flows seamlessly into the current AONB and it affords wonderful views over the current AONB. it is regularly used by walkers who use the footpaths on it to access the AONB.'</i></p> <p><b>ANON-PQ5Q-KRRC-V</b>  <i>'There is a beautiful panoramic vista of the south side of stoney field of the north downs. The uninterrupted view makes it an appropriate to be named AONB. We locals enjoy a good walk and there is also a bridleway which is popular with horse riders. The bogs with it's flower and fauna along with the wildlife needs to be protected'</i></p> <p><b>ANON-PQ5Q-KRGN-S</b>  <i>'A - The Bogs are an essential part of the local Landscape quality by adding a unique area in The</i></p>	

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>Godstone Hills which additionally supports a flood level by acting as our local sponge in high rainfall.</i></p> <p><i>B- Inside The Bogs is a unique enviroment, lots of ancient woodland adding to the Secnic [scenic] quality.</i></p> <p><i>C - The Bogs are genuinly a wild area. locked away without easy public acceess it is left to naturally develop. Never been nbuilt [built] on it is a treasured area.</i></p> <p><i>D- Standing iside [inside] it is a unique area. Nobody around, its is a complete treat for the senses. Wildlife lives in peace and deer are oftern [often] seen.</i></p> <p><i>E- our natural flora and fauna abound naturally, left untouched in a polition [pollution] free area.'</i></p> <p><b>ANON-PQ5Q-KRQ8-D</b></p> <p><i>'The Bogs is a rare example of wet deciduous woodland habitat which should be preserved. Stoney Field is very close to where I live and I walk across it frequently and almost daily during the summer. It has stunning views of the North Downs and is usually planted with maize which provides an ever changing green backdrop from spring until harvest in autumn. Stoney Field provides a delightfully rural route to St Mary's Church and Oxted town centre from Barrow Green Road which completely enhances the experience of living in the Oxted area and provides a timely reminder of bygone days when life was calmer</i></p>	

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>and less stressful. A walk through Stoney Field in either direction evokes a definite sense of wellbeing.'</i></p> <p><b>ANON-PQ5Q-KRS2-9 and ANON-PQ5Q-KRTV-E</b>  <i>[Anon] fully supports the inclusion of this area as defined in Figures 12b and 23b of the Second Consultation Documents. We agree with the conclusions made by Natural England (Appendix 16: Godstone Hills Analysis Table) that Stoney Field and The Bogs form part of a sweep of landscape up to the settlement boundary and that Stoney Field affords dramatic views of the chalk scarp. The views are directly into the existing AONB and are of exceptional quality, encompassing dramatic land forms which provide both drama and a strong sense of place. We agree that this area has the same high quality landscape as the existing AONB to the north, blends seamlessly with it and has a high degree of intervisibility with it. The Bogs is a noted natural heritage feature comprising ancient and deciduous wet woodland and a provisional Site of Nature Conservation Interest (SNCI).</i></p> <p><i>We are very pleased that Natural England has found a boundary which captures the extent of this very special area of qualifying land and reflects the continuation of this exceptional landscape to the settlement edge. We wholeheartedly endorse this boundary amendment</i></p>	
Object to proposed Addition 13 and wished to	Of the respondents who disagreed with the designation of Addition 13, 3 provided a reason for their view as follows:	<u>Commentary</u>

Boundary		
Theme	Representations	Natural England Commentary
see an alternative boundary	<p><b>ANON-PQ5Q-KRP5-9</b>  <i>'I strongly disagree with the opinion that this area is beautiful. In particular, the field, known as Stoney Field, is not attractive in appearance, has no scenic quality and has no particular sense of wildness or tranquillity. The Bogs themselves are of some interest and importance but are protected as an area of Ancient Woodland. However, it is possible to include the Bogs by amending the boundary to exclude the field itself which could readily be done by using the field boundary on the western side of Stoney Field which runs alongside the stream towards the Bogs. To include a very ordinary field in the AONB simply because it has a view of the existing AONB would be inappropriate.'</i></p> <p><b>ANON-PQ5Q-KRT9-H</b>  <i>'I agree that The Bogs is a valuable ecological asset and should be protected. However, I do not believe that this site meets Natural England's own natural beauty criteria set out in their 'Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England'.</i></p> <p><i>The Natural England guidance states that areas should not be included unless they display special qualities and they provide criteria (Table 3) for assessing this. This site does not display these qualities.</i></p>	<p>Natural England Guidance sets out that the evaluation of land in relation to natural beauty should not be undertaken on a field-by-field basis (para 5.3 4<sup>th</sup> bullet).</p> <p>The Natural Beauty Assessment Report (page 158) did not identify this area of land as transitional but rather noted that the <i>'upper parts of the greensand vale, to the northwest of Oxted, where the undulating topography and extensive semi-natural ancient woodlands form a relatively enclosed and distinctive landscape which is continuous with the existing AONB chalk land landscape to the north is considered suitable for inclusion in the Candidate Area.'</i></p> <p>Pages 7 - 8 above, set out the reasons why Addition 13 qualifies for inclusion within the proposed AONB extension. This noted that the field in question forms part of a sweep of undulating farmland which continues up to the urban edge and that built form does not exert a significant influence on the rural qualities of this land.</p> <p>Natural England has reviewed the planning status of the field northwest of the church and notes that in the latter half of 2024 a Scoping Opinion was sought for development of the site comprising 140 dwellings and an 80-unit care home (Planning Application 2024/956/EIA). The Scoping Report notes sensitive views from the site to the AONB, Church and scarp, as well as proximity to The Bogs. These qualities contribute to the natural beauty of the area as a whole.</p> <p>Natural England Guidance (Appendix 4) states that land which is allocated for development or has planning permission at the margins of the AONB should normally be excluded. However, this does not apply to this site given its early stages in planning. Should circumstances change prior to the Designation Order being made, then this will need to be reviewed.</p> <p>On this basis, Natural England considers this proposed addition and associated boundary to remain robust.</p> <p><b>Conclusion</b></p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>Even if the boundary of the AONB wasn't extended at all, this site already falls within the setting of the AONB, which gives it protection.</i></p> <p><i>Appendix 4 of Natural England's guidance – Boundary Setting Considerations - states 'Often there will be a transition of natural beauty ... across a sweep of land ... the boundary ... should be drawn towards the high quality end of the transition in a manner that includes areas of high quality land and excludes areas of lesser quality land i.e. it should be drawn conservatively. Visual associations may also be used to help define the extent of land for inclusion in these circumstances.'</i></p> <p><i>This site does not fall within the 'high quality' end and is not high quality, so should not be included in the revised AONB boundary. The view of the scarp is not enough - there are lots of places in the area from which the scarp can be seen, but they aren't proposed to be included in the AONB.</i></p> <p><i>In conclusion, this site doesn't meet Natural England's beauty criteria, isn't of high enough quality and shouldn't be included in the AONB.'</i></p> <p><b>ANON-PQ5Q-KRXP-C</b></p> <p><i>'We need more housing in Oxted, a commuter town with a busy train station and plenty of land that could be developed to help young people find somewhere to live / upsize etc. (or indeed older people to downsize should they wish to).</i></p> <p><i>Designating more land as AONB, including an unattractive muddy field 5 minutes walk from Oxted</i></p>	<p>No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>train station, seems to me to run counter to that. I understand there are plans to build on said muddy field and I am supportive of that.</i></p> <p><i>I fear that designating more land as AONB will make it harder to build much needed housing, either because it will be banned or because it will increase planning costs. House prices are now c 9x average salary. Meanwhile, Surrey has more land dedicated to golf courses than housing.'</i></p>	
<p><b>Include Old Oxted Mill Area</b></p>	<p><b>ANON-VUXE-WM59-T</b> and <b>ANON-VUXE-WMZG-D</b> requested the inclusion of land in the Oxted Mill area. The reasons for this are summarised below:</p> <p><b>Natural Beauty</b></p> <ul style="list-style-type: none"> <li>• This area offers exceptional scenery, wildlife and tranquillity.</li> <li>• Home to the historic old Oxted mill.</li> <li>• Start and end of the most popular walking route in Oxted.</li> </ul> <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><b>Boundary</b></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><b>Commentary</b></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>



<b>Boundary</b>		
<b><u>Theme</u></b>	<b><u>Representations</u></b>	<b><u>Natural England Commentary</u></b>
	<p>There are viable boundaries that would preserve this area sensibly, such as</p> <ul style="list-style-type: none"> <li>• The River Eden.</li> <li>• The Property boundaries on Woodhurst Lane.</li> <li>• Woodhurst Lane itself.</li> </ul>	<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 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><b><u>Conclusion</u></b> Minor addition to include some of the land in the Oxted Mill area.</p> <p>(Addition 14 – Refer to Figure 24b)</p>
<b>Support for the proposed Addition 14: Land at Oxted Mill</b>	<p><b>193 respondents agreed with the designation of Addition 14, many reiterated evidence provided previously and some provided further reasons for their view.</b></p> <p>Examples of responses are as follows:</p> <p><b>ANON-PQ5Q-KRHH-M (Tandridge District Council)</b></p>	<p><b><u>Commentary</u></b></p> <p>Natural England acknowledges the reasons given by respondents in support for this addition.</p> <p>3 respondents disagreed with the designation of Addition 14 but provided no reason for their view.</p> <p>1 respondent wished to comment on the boundary but provided no comment.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>‘Tandridge District Council supports the inclusion of this area as defined in Figures 12b and 24b of the Second Consultation Documents. We agree with the conclusions made by Natural England (Appendix 16: Godstone Hills Analysis Table) that the features of interest in this area referenced in the Appendix, including the Broadham Green and Spring Lane Conservation Area and the Pol Ho Marsh provisional Site of Nature Conservation Interest (SNCI), contribute to the natural beauty of this area. We also agree that the area around the former mill and the historic Spring Lane, as well as the traditionally managed [managed] meadows and historic small-scale enclosures with mature hedgerows and trees, all contribute to the natural beauty of this area.</i></p> <p><i>We are very pleased that Natural England has found a boundary which captures the extent of this very special area of qualifying land. Tandridge District Council wholeheartedly endorses this boundary amendment.’</i></p> <p><b>ANON-PQ5Q-KR4X-G</b>  <i>‘This area provides a very attractive and varied rural landscape both wooded and open very close to Oxted and Old Oxted with great benefits to both wildlife and local residents.’</i></p> <p><b>ANON-PQ5Q-KR5C-V</b>  <i>‘A tranquil retreat and a chance to reconnect to the historical Oxted of the three mills. There is little surface water in the whole area so the streams and</i></p>	<p>Natural England notes therefore, that there are no responses specifying a change to the boundary in this area.</p> <p><b><u>Conclusion</u></b>  No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>pools, with different trees, plants and wildlife, should be cared for and remain unspoilt.'</i></p> <p><b>ANON-PQ5Q-KR9B-Y</b> <i>'A very peaceful and historic unspoiled place.'</i></p> <p><b>ANON-PQ5Q-KRJW-5</b> <i>'This is a beautiful water meadow, mill and managed lake that is home to waterfowl and supports numerous bird species in the surroundings. It also has a large number of native protected trees and has year round beauty and interest'</i></p> <p><b>ANON-PQ5Q-KRPE-S</b> <i>'This is an important area both historically and environmentally. It is home to a wide range of wildlife, currently a young heron has made his home in the mill pond We have deer roaming through the area, many species of ducks and birds , a wide variety of insects , frogs, toads and evidence of moles. There is an abundance of wild flowers , grasses and handsome mature trees. The mill itself is a very attractive building which has recently been sympathetically restored and now makes use of the mill race to provide power.</i></p> <p><i>All in all , this is an outstanding area of natural beauty which deserves to be protected for future generations.'</i></p>	

Boundary		
Theme	Representations	Natural England Commentary
	<p><b>ANON-PQ5Q-KRS2-9 and ANON-PQ5Q-KRTV-E</b></p> <p><i>'[Anon] fully supports the inclusion of this area as defined in Figures 12b and 23b of the Second Consultation Documents. We agree with the conclusions made by Natural England (Appendix 16: Godstone Hills Analysis Table) that the features of interest in this area referenced in the Appendix, including the Broadham Green and Spring Lane Conservation Area and the Pol Ho Marsh provisional Site of Nature Conservation Interest (SNCI), contribute to the natural beauty of this area. We also agree that the area around the former mill and the historic Spring Lane, as well as the traditionally managed meadows and historic small-scale enclosures with mature hedgerows and trees, all contribute to the natural beauty of this area.</i></p> <p><i>We are very pleased that Natural England has found a boundary which captures the extent of this very special area of qualifying land and wholeheartedly endorse this boundary amendment.'</i></p>	
<b>Inclusion of Godstone Golfcourse and Rooks Nest Park</b>	<p><b>ANON-VUXE-WEAP-N</b></p> <p>[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><b>Commentary</b></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>

Boundary		
Theme	Representations	Natural England Commentary
	<p><b>ANON-VUXE-WS13-P</b></p> <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>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> <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 Tandridge Hill 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>

Boundary		
Theme	Representations	Natural England Commentary
		<p><b><u>Conclusion</u></b> No change.</p>
<p><b>Southern boundary of the Godstone Hills - Overview</b></p>	<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"> <li>• Inclusion of land between Greensand Way and Southlands Lane to the southeast of Tandridge village.</li> <li>• Inclusion of land between Hill Road and Tandridge Lane as far as the railway.</li> <li>• Exclusion of land between Eastbourne Road and Tandridge Lane.</li> <li>• Exclusion of land north of Hart's Lane.</li> </ul>	<p><b><u>Commentary</u></b></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> <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</i></p>

Boundary		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
		<p><i>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....' 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'.</i></p> <p><i>It went on to state under 'Settlements' (page 160) that '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 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>

Boundary		
Theme	Representations	Natural England Commentary
<p><b>Include land north of Southlands Lane between Tandridge Lane and Broadham Green</b></p>	<p><b>ANON-VUXE-WEQH-W and ANON-VUXE-WEGX-3</b></p> <p>Reasons given include:</p> <ul style="list-style-type: none"> <li>• Southlands and Tandridge Hall add interest to an area.</li> <li>• Traditionally farmed pasture and hay meadow interspersed with woodland running down from the Greensand ridge into the Weald.</li> <li>• Represents a picturesque mixture of pasture and hay meadow and woodland.</li> <li>• More picturesque than areas of arable farmland to the west of Tandridge village which is currently within the proposed boundary.</li> </ul> <p><b>Boundary</b></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 <b>ANON-VUXE-WE3G-X</b> also requested the inclusion of land south of Southland Lane, as far as the railway.</p>	<p><b>Commentary</b></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 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>



Boundary		
Theme	Representations	Natural England Commentary
		<p>On balance, Natural England remains of the view that the proposed boundary is the most suitable boundary.</p> <p><b>Conclusion</b> No change</p>
<p><b>Inclusion of land up to the Tonbridge to Redhill railway line</b></p>	<p>Respondents requested the inclusion of land as far as the Redhill-Tonbridge railway line.</p> <p><b>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, 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.</b></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"> <li>The removal of the proposed garden village from the emerging local plan.</li> <li>The boundary should not be drawn around the former Garden Village Area of Search.</li> </ul>	<p><b>Commentary</b></p> <p><b>Withdrawal of the Tandridge Local Plan</b></p> <p>Natural England notes the material change in circumstances associated with the Tandridge Local Plan including:</p> <ul style="list-style-type: none"> <li>The correspondence from Tandridge District Council to the Inspector detailing an update to the Spatial Strategy which removes the proposed South Godstone Garden Community<sup>1</sup>.</li> <li>The recommendation by the Inspector that he found the plan to be unsound and recommended the Local Authority to withdraw it.</li> <li>The decision by Tandridge District Council to not withdraw the plan but to ask the Inspector to prepare his report and findings.</li> </ul> <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>

<sup>1</sup> Correspondence number TED581 dated 24 March 2023 from TDC to the Inspector

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> <li>The area as far as the railway was originally proposed for designation.</li> <li>The only busy road is the A22, all other roads are rural.</li> <li>Limited aircraft noise and development.</li> <li>Shares the same characteristics as the nearby EA10b Candidate Area.</li> <li>Same natural beauty characteristics as the EA 10b candidate area.</li> </ul> <p><b>ANON-VUXE-WE71-C (Tandridge District Council) provided a detailed analysis of the area against the natural beauty factors as follows:</b></p> <p><b>Landscape Quality</b></p> <ul style="list-style-type: none"> <li>Low lying landscape with a broadly undulating land form.</li> <li>Distinctive undulating topography which is diverse.</li> <li>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.</li> <li>Field boundaries in this area are in good condition.</li> <li>Ever-changing and diverse views of undulating land forms, open fields, and woodland backdrops.</li> <li>Gibbs Brook, a small river tributary of the River Eden - alive with fish and crayfish. This natural feature generates its own sense of place.</li> </ul>	<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><b><u>The inclusion/exclusion of the settlement of South Godstone</u></b></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 remains of the view that South Godstone does not qualify for inclusion within any extension to the Surrey Hills AONB.</p> <p><b><u>Natural Beauty of the area</u></b></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><b>Land west of the A22 and south of Hart's Lane</b></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</p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>Scenic Quality</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>This transition does not result in a decline in scenic quality, instead this transition is an important element which contributes to the natural beauty.</li> <li>Open and rural character that is enhanced by the gently undulating landform.</li> <li>The visual interest is heightened by the presence of diverse natural features, including woodlands, tree belts, hedgerows, ponds and fields.</li> <li>Interconnected mosaic of woodlands including shaws, fields, farmsteads and parklands.</li> <li>The settlement of South Godstone - presence is minimised.</li> <li>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</li> </ul>	<p>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> <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><b>Land to the east of the A22</b></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>

Boundary		
Theme	Representations	Natural England Commentary
	<p>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> <p><b>Relative Wildness</b></p> <ul style="list-style-type: none"> <li>Pockets of relative wildness are experienced mostly in the woodlands and tree belts.</li> </ul> <p><b>Relative Tranquillity</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>The Tonbridge-Redhill railway is electrified and supports only a limited service, which means the trains are rarely heard.</li> </ul> <p><b>Natural Heritage</b></p> <ul style="list-style-type: none"> <li>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.</li> <li>Omits reference to Gibbs Brook and crayfish</li> </ul> <p><b>Cultural Heritage</b></p> <ul style="list-style-type: none"> <li>Park Pale and listed buildings.</li> <li>Paygate Wood and memorial site for crashed RAF pilot in WWII.</li> </ul>	<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> <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 <b>ANON-VUXE-WEXR-E to exclude land north of Hart's Lane and north of Miles Lane and New Road</b> due to declining natural beauty (see below).</p> <p><b>Boundary</b></p> <p>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>

Boundary		
Theme	Representations	Natural England Commentary
	<p><b>Desirability</b> 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><b>Boundary</b> A variety of boundary options were put forward.</p> <p>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>Others also requested an extension which went as far east as Tandridge Lane (including Paygate Wood) eg <b>ANON-VUXE-WMJ1-7</b>. Others requested a slightly smaller area as far as Miles Lane in the northeast.</p> <p><b>ANON-VUXE-WE3G-X</b> requested inclusion of land east of Tandridge Lane and as far south as the railway.</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 <b>ANON-VUXE-WEXR-E</b> 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 more fully under the <b>Exclude land north of Hart's Lane and north of Miles Lane and New Road</b> 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><b>Conclusion</b> Minor deletion to exclude land. Please see below for further details of this minor change.</p>
Include land to the south as far as the Eden Valley and High Weald AONB	<p><b>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,</b></p>	<p><b>Commentary</b> 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>

Boundary		
Theme	Representations	Natural England Commentary
	<p><b>BHLF-VUXE-WSKS-G, ANON-VUXE-WEQ5-A</b> 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>Many framed their arguments in relation to the opportunity to forge a connection to the High Weald and made reference to:</p> <ul style="list-style-type: none"> <li>• Surrey Biodiversity Opportunity area of the River Edem and tributaries</li> <li>• 2019 Landscape Review led by Julian Glover – national landscapes should be the backbone of nature recovery, joining things up within and beyond their boundaries.</li> <li>• 2010 Lawton Review – bigger, better and more joined up.</li> </ul> <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</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><b><u>Consideration of the landscape in the Natural Beauty Assessment Report</u></b> 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> <p><b><u>Natural Beauty</u></b> 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>

Boundary		
Theme	Representations	Natural England Commentary
	<p>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 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><b>Natural Beauty</b> Respondents also gave reasons why the area is considered to meet the natural beauty criterion. These include:</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, <b>ANON-VUXE-WEV9-K</b> and <b>ANON-VUXE-WERX-E</b>) and Natural England agrees.</p> <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> (<b>ANON-VUXE-WEBG-D</b>). The fact that this landscape has not been identified as an Area of Great Landscape Values (AGLV), strengthens this view.</p> <p><b><u>Inclusion of the River Eden Biodiversity Opportunity Area (BOA)</u></b></p>

<b>Boundary</b>		
<b><u>Theme</u></b>	<b><u>Representations</u></b>	<b><u>Natural England Commentary</u></b>
	<ul style="list-style-type: none"> <li>• Gently undulating farmland.</li> <li>• Well maintained landscape.</li> <li>• Quiet country lanes.</li> <li>• Sparce settlement.</li> <li>• Views from elevated points to the North Downs and High Weald.</li> <li>• Blindley Heath SSSI (relic damp grassland supporting rare species).</li> <li>• Peacefulness.</li> <li>• Dark night skies.</li> <li>• Old farmhouses and listed buildings.</li> <li>• Church of St George's Church, Crowhurst and ancient yew.</li> <li>• Small brooks feeding the River Eden.</li> <li>• Ancient bluebell woodland.</li> <li>• Diverse wildlife.</li> <li>• Oldest working mill at Outwood.</li> <li>• Langham Moat (SSSI) and park pale.</li> </ul> <p><b>Desirability</b></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><b>Boundary</b></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</p>	<p>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 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><b><u>Boundary</u></b></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>



Boundary		
Theme	Representations	Natural England Commentary
	<p>south as Blindley Heath and then east to the Surrey/Kent border and edge of the High Weald National Landscape (AONB).</p> <p><b>ANON-PQ5Q-KRR3-9</b>  <i>'Natural England should consult on extending the High Weald Geodiversity Corridor south of Ashdown Forest and include Lake Wood Local Geological Site, West Park Local Geological Site, Shortbridge Stream, Ashdown Forest and its medieval forest pale now known (missing) Park Wood at Maresfield, the well preserved High Weald medieval landscapes of Buxted national monument and Budletts Common with remains of commons/moated lodge/medieval hall/ hunting lodge and , Langley Forge and Hammer Ponds of Powdermills, Longwood Gill High Weald rock outcrops in the AONB East Sussex all connected via Shortbridge Stream to Ashdown Forest'</i></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><b>Conclusion</b> No change.</p> <p><b>Commentary</b>  Land within Ashdown Forest lies within East Sussex and within the High Weald National Landscape. It is already designated a National Landscape. The High Weald Geodiversity Corridor is a term used to describe the diverse and important geology of the High Weald National Landscape. This respondent therefore appears to be requesting an extension of the High Weald National Landscape rather than an extension to the Surrey Hills AONB boundary, and therefore the comments are beyond the scope of this designation project and consultation.</p> <p><b>Conclusion</b> No change.</p>
Inclusion of land east of the M23 and south of the A25	<p><b>ANON-VUXE-WSQ2-N (Tandridge District Council) and ANON-VUXE-WEAP-N</b></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><b>Commentary</b>  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>

Boundary		
Theme	Representations	Natural England Commentary
	<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		
Theme	Representations	Natural England Commentary
		<u>Conclusion</u> No change
<b>Inclusion of land west of the M23 and south of A25</b>	<p><b>ANON-VUXE-WSKH-5</b></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><b>Landscape Quality</b></p> <ul style="list-style-type: none"> <li>• Strong visual connection to the wider landscape being the highest point (160m) of the Greensand Ridge – striking feature.</li> <li>• Ancient woodland and wooded shaw.</li> <li>• Former Fullers Earth works are rewooded.</li> </ul> <p><b>Scenic quality</b></p> <ul style="list-style-type: none"> <li>• The dramatic hilltop and scenic quality of Hillsbrow and its surrounding ancient</li> </ul>	<p><u>Commentary</u>  <b>Natural Beauty Assessment and Exclusion of Area from Candidate Area</b></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 (page 145), 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>            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		
Theme	Representations	Natural England Commentary
	<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"> <li>• This landscape has a long-established and tranquil feel.</li> <li>• The landscape has visual scenic qualities that are over and above ordinary or attractive countryside.</li> <li>• Visually connected to the dramatic existing AONB to the north and provides views southwards across the Low Weald farmland.</li> </ul> <p><b>Relative Wildness</b></p> <ul style="list-style-type: none"> <li>• Handful of listed properties on the southside of the A25, this area is otherwise absent of urban influences.</li> <li>• 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.</li> </ul> <p><b>Relative Tranquillity</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• There is a wonderful sense of remoteness and isolation.</li> <li>• 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.</li> </ul> <p><b>Natural Heritage Features</b></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><b>Qualities of this area</b></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"> <li>• 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.</li> <li>• 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.</li> <li>• The ridges of higher land enable elevated scenic views southwards especially from Nutfield Priory and the Greensand Way west of South Nutfield.</li> <li>• The 17<sup>th</sup> and 18<sup>th</sup> century small scale field enclosure pattern comprising mature hedgerows and trees is intact west of South Nutfield.</li> </ul> <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		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> <li>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.</li> </ul> <p><b>Cultural Heritage Features</b></p> <ul style="list-style-type: none"> <li>The outstanding beauty of this area drew the artist John Linnell (1792-1882) Linnell painted views from this ridge.</li> </ul> <p><b>BHLF-VUXE-WSK3-G</b></p> <p>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"> <li>The area is less affected by noise from the M23 than land to the east of the M23 which is affected by prevailing winds.</li> <li>The evidence for including the area east of the M23 is weaker than the evidence for excluding land to the west.</li> <li>It is inconsistent to exclude land on the basis of noise and greater weight should be given to landscape value and accessibility.</li> <li>Association of the area with Linnell and Samuel Palmer.</li> <li>Minerals working at Hillsbrow is largely restored and this hill defines Redhill and forms its setting.</li> <li>Areas of ancient woodland on this hillside.</li> <li>Views to and from this hill should be protected.</li> </ul>	<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		
Theme	Representations	Natural England Commentary
	<p><b>ANON-VUXE-WSQ2-N (Tandridge District Council) and ANON-VUXE-WEAP-N</b></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><b>Boundary</b></p> <p>Natural England notes that the boundary proposed by <b>ANON-VUXE-WSQ2-N (Tandridge District Council)</b>. However, even if this area were considered of sufficient natural beauty for designation, it would be small in scale and physically isolated 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><b>Conclusion</b></p> <p>No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<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		
Theme	Representations	Natural England Commentary
	<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>Representations</u>	<u>Natural England Commentary</u>
<b>Whole of Vale of Homesdale (west of M23 and north of A25)</b>	<p><b>BHLF-VUXE-WSK3-G</b> wished to see the inclusion of the whole of the Vale of Homesdale. Reasons given include:</p> <ul style="list-style-type: none"> <li>• Area now restored to landscape of outstanding value.</li> <li>• Former mineral sites have led to a lasting legacy for residents.</li> <li>• Been established over last 30 years.</li> <li>• Well valued by local residents.</li> <li>• Mosaic of lakes and woodland.</li> <li>• Active minerals sites such as Nutfield Marsh Quarry and Patteson Quarry have been included as they will be restored in next 5-7 years.</li> <li>• Marshes create a context in which the North Downs are appreciated this adds weight and depth to the area.</li> <li>• Not possible to define where the AONB stops when looking south from Spynes Mere.</li> <li>• Stated vision to continue to improve the landscape.</li> <li>• Landfill site will be restored in next 5-7 years.</li> <li>• Westland area complements the rising hills.</li> </ul> <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><b><u>Commentary</u></b></p> <p>The reasons for including the Vale of Homesdale put forward by respondent <b>BHLF-VUXE-WSK3-G</b> 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><b><u>Conclusion</u></b> No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
Inclusion of Mercer Country Park	<p><b>ANON-VUXE-WSQ2-N (Tandridge District Council)</b></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><b>Commentary</b></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		
Theme	Representations	Natural England Commentary
	<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><b>Conclusion</b> No change.</p>

<b>Boundary</b>		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
<b>Inclusion of Nutfield Marsh common</b>	<p><b>A couple of respondents (ANON-VUXE-WSQ2-N (Tandridge District Council) and ANON-VUXE-WEV4-E (Reigate &amp; Banstead District Council) requested the inclusion of Nutfield Marsh for the following reasons:</b></p> <ul style="list-style-type: none"> <li>Nutfield Marsh hamlet has several well scattered C17 cottages (Grade II) and an ancient Commonland, which collectively provide a sense of timelessness.</li> <li>Nikolaus Pevsner describes this hamlet as a “genuine hamlet with a big rough green.” (The Buildings of England: Surrey).</li> <li>Nutfield Marsh common land has remained unchanged for many centuries.</li> <li>It is a very beautiful and tranquil area, much loved by walkers, bird watchers, cyclists etc.</li> <li>It is a haven for wildlife and flora and fauna throughout the area.</li> </ul>	<p><b><u>Commentary</u></b></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><b><u>Conclusion</u></b> No change.</p>
<b>Land between Nutfield Priory and Mercer Park within Reigate and Banstead along Cormongers Lane (Nutfield Strip)</b>	<p><b>ANON-VUXE-WEV4-E (Reigate and Banstead District Council)</b></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 &amp; Banstead.</p> <p>Reasons given for the inclusion of this area include:</p>	<p><b><u>Commentary</u></b></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		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> <li>When looking eastwards from Mercers Lake there is a clear relationship between the exiting AONB in the east and Nutfield.</li> <li>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.</li> <li>From Cormongers Lane towards Nuffield, there is historic farmland interspersed with areas of woodland.</li> <li>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.</li> <li>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.</li> <li>The distant landscape is agrarian in character whilst the northern areas have been subject to quarrying and land restoration.</li> <li>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.</li> </ul>	<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><b><u>Conclusion</u></b> No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
<p><b>Extend boundary to include land northeast of White Post</b></p>	<p><b>ANON-PQ5Q-KR36-D</b></p> <p><i>'I had assumed its initial exclusion had arisen due to the nearby A25 (Godstone Road) and the visible edge of the historic Blethingley [Bletchingley] settlement but now understand these are not Natural England exclusions.</i></p> <p><i>I am hoping that, although the timing of my following proposal is out of step with the current stage of the consultation, due to its obvious outstanding beauty it can still be considered.</i></p> <p><i>My proposal is backed by approximately 50 residents, who were all previously unaware of your important consultation.</i></p> <p><i>....the land I propose for addition more than matches the criterion[a] given for their inclusion'</i></p> <p>The land includes historic White Post fields, Chevington and Water House Farm.</p> <p>Reasons given include:</p> <ul style="list-style-type: none"> <li>currently carries the local designation Area of Great Landscape Value. Designated due to its high quality landscape and importance to the views to and from the Surrey Hills AONB (especially Caterham View Point)</li> <li>many farmhouses which are 12th century</li> <li>include Pound Farm Cottage for reasons of consistency</li> <li>historic buildings at Chevington</li> <li>associated historic Chevington watercress</li> </ul>	<p><u><b>Commentary</b></u></p> <p>Natural England has followed best practice in publicising the first and second statutory consultations. Details of the approach adopted, can be found within the Consultation Analysis Report for the 2023 and 2024 consultations.</p> <p>The land, which is the subject of this response, lies to the west of the proposed boundary between Ivy Mill Lane and Waterhouse Lane to the north, Godstone Road to the northwest and Rabies Heath Road to the south.</p> <p>This area was assessed as part of Evaluation Area 10b during the Natural Beauty Assessment. The Natural Beauty Assessment Report noted that: <i>'This area is settled, and the quality of the greensand ridge landscape is partially eroded by .....the influence of modern residential development in the settlements of Bletchingley, Old Oxted and South Nutfield.'</i> It also acknowledged that <i>'The wooded greensand ridge is an exceptionally scenic landscape, which has a striking visual connection with the chalk escarpment to the north, with an attractive interplay of views between the two ridges, across the greensand vale'</i>, but that <i>'The scenic quality of the greensand ridge landscape is compromised in localised areas by views to residential neighbourhoods (such as the eastern fringes of Redhill, Bletchingley and White Post), the road infrastructure of the M23 and to the Patteson Court landfill to the north.'</i> It concluded that <i>'The mosaic of woodland, shaws, farmland and parkland on the elevated greensand ridge is an exceptionally scenic landscape. On the northern side of the hills there is a strong visual connection to the North Downs escarpment and the existing AONB.'</i> But it went on to state <i>'In the north where the greensand hills are settled (e.g. Bletchingley and White Post), there are lower levels of natural beauty.'</i></p> <p>Whilst the land north of White Post was included within the Candidate Area for designation (Figure 11.10), it was noted that particular scrutiny would be needed <i>'on the edges 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> It went on to note <i>'fragmentation has occurred on the margins of Godstone, White Post and Bletchingley, and care will be required when drawing a boundary in these areas to exclude land uses which are more urban in character, and</i></p>

Boundary		
Theme	Representations	Natural England Commentary
	<p>meadow</p> <ul style="list-style-type: none"> <li>dramatic sloping arable field topography</li> <li>scenic compositions forming the higher slopes of the Greensand Ridge</li> <li>ancient woodland at Harlings Shaw</li> <li>positive contribution the hillside backdrop makes to the natural beauty of the area and to the scenic views from the Surrey Hills AONB, and with wide open views to the Surrey Hills AONB.</li> </ul> <p><b>Proposed Boundary:</b></p> <p><i>'Boundaries follow Ivy Mill Lane, WaterHouse Lane, Godstone Road, Rabies Heath Road; all believed to be pre 12th century. The boundary follows roads, tracks, hedgerows, fence lines and the edge of woodland, all of which form features on the ground.</i></p> <p><i>Natural Englands guidance makes it clear that a designation can washover a tract of land even though that land does not itself meet the designation criteria...provided it sits within a sweep of qualifying land (para 5.4 bullet 9).'</i></p> <p>A number of benefits were also cited as reasons for including this land as follows:</p> <ul style="list-style-type: none"> <li>Benefits from integrated management</li> <li>Benefits arising from additional resources</li> <li>Benefits from conservation and enhancement (including improved management of Harlings</li> </ul>	<p><i>where natural beauty is undermined.'</i> It also made clear that the urban areas of 'Oxted, Bletchingley, White Post, Godstone, and South Nutfield have been excluded from the proposed Candidate Area because they comprise a mix of development types, including linear and/or housing estate development, which does not respect traditional settlement form or vernacular styles and materials. Overall, these settlements do not contribute to natural beauty and do not sit within a tract of landscape which meets the natural beauty criterion.'</p> <p>At the boundary assessment stage, the boundary was drawn within the Candidate Area to follow a hedgerow and farm track between Rabies Heath Road and Ivy Mill Lane. This enabled the exclusion of development along Rabies Heath Road associated with White Post and the relatively recent replacement dwelling at Pond Farm Cottage as well as the expansion of large-scale barns to the south of Harlings Shaw. It also excluded the lower slopes of the greensand ridge adjacent to Godstone Road and small-scale commercial development at Water House Farm. These features were considered to detract from the natural beauty of the area.</p> <p>Natural England accepts that in defining the boundary to the west it results in the exclusion of an area of ancient woodland at Harlings Shaw and a listed building at Chevington Farm as well as undulating greensand slopes to the north of Rabies Heath Road which affords views to the chalk scarp and that this land is also visible from Caterham viewpoint. It is not unusual for there to be intervisibility between designated landscape and their setting, and this is not a reason for including land.</p> <p>On balance, Natural England remains of the view that the proposed boundary is the most suitable and robust line within this area.</p> <p>Natural England also notes that the area forms part of the AGLV. The future of this local designation does not form part of the National Landscape boundary review as set out in Appendix 2 page 20-21. Natural England notes that the HDA study (2013) did identify land as far as the public right of way and Harlings Shaw as suitable for designation. Nevertheless, this latter assessment predates development at Pond Farm Cottage and expansion of activity at the barns south of Harlings Shaw. Natural England is also aware of a current planning application for 100 dwellings (2024/907) which is yet to be determined. Given this application lies outside of the area proposed by Natural England for designation, Natural England does not consider it to</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p>Shaw)</p> <ul style="list-style-type: none"> <li>Statutory protection in planning</li> <li>Proximity to centres of population and access</li> <li>Area of Greater Landscape Value (AGLV) status is uncertain and therefore should be designated as Area of Outstanding Natural Beauty</li> <li>Bringing in additional land to fulfil Government commitment to nature recovery and addressing climate change</li> <li>Bringing in additional land to improve access and wellbeing.</li> </ul>	<p>be relevant to our boundary decision making. Should a decision be reached to approve planning in this area, it will strengthen Natural England's position regarding the proposed boundary.</p> <p>Natural England does not agree that wash-over should apply in this location. Natural England Guidance highlights that:</p> <ul style="list-style-type: none"> <li>The decision to include land that does not itself meet the technical criteria depends on the location, scale and effect of that land.</li> <li>Particular care is required at the margins of a designation.</li> <li>In principle a designation can wash-over (i.e. include) land even though that land does not itself meet the designation criteria, including when located close to the boundary of a designated area.</li> </ul> <p>In this instance, the land lies at the margins of qualifying land and comprises a relatively small area of land which is not surrounded by qualifying land or part of a wider tract of qualifying land. The proposed boundary includes qualifying land to the east and excludes lesser quality land to the west.</p> <p>The proposed boundary does not prevent the AONB team from working beyond the boundaries of the designation, meaning that this area could still benefit from the resources and expertise which would apply.</p> <p><b>Conclusion</b> No change.</p>
Request for Exclusion of Areas		
Exclude land north of Hart's Lane and north of Miles Lane and New Road	<p><b>ANON-VUXE-WEXR-E</b> 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"> <li>Inclusion of only limited areas of transitional land south of the Wooded Greensand Hills</li> </ul>	<p><b>Commentary</b></p> <p><b>Withdrawal of Tandridge Emerging Local Plan</b></p> <p>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>



Boundary		
Theme	Representations	Natural England Commentary
	<p>Landscape Character Type within the Godstone Hills proposed Extension Area.</p> <ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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 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</li> </ul>	<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><b><u>Potential harm arising from development</u></b> 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><b><u>Transitional Nature of the Landscape</u></b> The Natural beauty of land north of Hart's Lane and north of Miles Lane and New Road is set out above under <b>Inclusion of land up to the Tonbridge to Redhill railway line.</b></p> <p><b><u>Boundary drawn more closely to the greensand ridge</u></b> 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> <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</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p>Farmland LCT, south of the Wooded Greensand Hills LCT.</p> <p><b>Suggested Boundary</b></p> <p>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 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</p>	<p>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> <p>Natural England therefore proposes a small reduction in the area to be included within the proposed Extension Area.</p> <p><b>Conclusion</b></p> <p>Minor deletion to remove the lower quality land within the transition.</p> <p>(Deletion 8 – Refer to Figure 24b)</p>

Boundary		
Theme	Representations	Natural England Commentary
	follows the boundary of the AONB Candidate Area (Policy TLP34 in the Local Plan Policies Map 2018).	
Object to proposed Deletion 8 and wish to comment on the boundary to include more land	<p><b>Of the 42 responses received for this area, those that provided a reason for their view objected to Deletion 8 and commented on the boundary, as follows:</b></p> <p><b>ANON-PQ5Q-KRHH-M (Tandridge District Council)</b>  <i>'Tandridge District Council would like to understand how the land was determined to be 'lower quality' given that it appears largely the same as the land parcels directly adjacent that are included within the amended boundary (excluding the coppice) which is not addressed in the 2023 Consultation Analysis Report. Furthermore, the road creates a fixed feature and neat boundary with similar (to the adjacent border) low-level hedging bordering the road, synonymous and congruent to the location.</i></p> <p><i>It is felt that the addition of this land would not detract from the area or compromise the natural beauty. Bullet point 9 of paragraph 9.5 states: "Where a boundary follows a minor track, quiet lane, or right of way however, these features should be included" – it therefore seems appropriate to include this land up to New Road as this would align with the guidance. In addition to this, Appendix 4 Boundary Setting Considerations in particular Types of Boundary states: "Wherever possible, an easily distinguishable permanent physical boundary should be chosen. Boundaries should not if possible be overly complex</i></p>	<p><b><u>Commentary</u></b></p> <p>The Natural Beauty Assessment Report (page 159) 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>Whilst Natural England Guidance emphasises that, wherever possible, boundaries should follow easily distinguishable physical features and avoid unnecessary complexity, it also advises that in transitional areas, boundaries should be drawn conservatively. In any given situation, different boundary considerations may be relevant. Natural England Guidance does not place one boundary consideration above another and therefore a judgment is reached in each situation as to which consideration(s) are most influential in defining a robust boundary.</p> <p>The reasons for the revised boundary in this area are detailed on pages 49-51 above. Pages 22-24 above provide the context for the review of the southern boundary of the Godstone Hills which is transitional. Natural England reached the view that the boundary in the vicinity of New Road had been drawn towards the lower end of the transition.</p> <p>Natural England accepts that the proposed boundary is more convoluted but nevertheless follows clear features on the ground. It is not uncommon for landscapes on either side of a boundary to appear similar, particularly in transitional areas.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>or convoluted. Where a boundary follows a road, the road verges and embankments may be included in the designation where they blend into the wider landscape.” The road would therefore become an easily distinguishable permanent physical boundary and should be reconsidered for inclusion.’</i></p> <p><i>‘For the sake of clarity, Tandridge District Council would like to make it clear that it is in full support of all the proposals within the second consultation. This includes all proposed amendments, additions, and deletions; in regard to the deletions the Council would like some clarification as stated within the response. This should not be seen as opposing of the proposed deletions.’</i></p> <p><b>ANON-PQ5Q-KR4A-S</b>  <i>‘[Anon] strongly objects to the deletion of this land. We find it almost incomprehensible that after the district council and many other respondents made a full, and closely argued, case for an extension of the boundary southwards to the railway line, Natural England should actually RETRACT it northwards on the basis of a single representation. Again this undermines the credibility of the exercise and of the consultation process.</i></p> <p><i>As Tandridge District Council pointed out in its response, the land in question is very similar to adjacent undulating areas that are to be included in the extended AONB, with equivalent scenic value, views and tranquillity, and a rich cultural and natural</i></p>	<p>Natural England does not consider the proposed boundary to be contrary to Guidance.</p> <p>The exclusion of land north of New Road does not mean this land lacks features of interest such as Gibbs Brook. Nevertheless, Natural England considers these more open fields lack the qualities expressed further north which contain a combination of watercourses, varied topography and a mosaic of woodland and pastures.</p> <p>During the first (2023) statutory consultation analysis, Natural England considered proposals for the boundary to extend further to the south along the railway (pages 25-29 above) or to include the River Eden Biodiversity Opportunity Area (pages 30-33 above). Natural England accepts that the railway extends in a southeasterly direction rather than ‘swinging’ southwards but does not consider this to make a material difference to the judgements which have been reached. Natural England remains of the view that these areas should be excluded and that arguments have been adequately addressed.</p> <p>Natural England has reviewed the 2017 document called ‘Land at South Godstone Historical Assessment’ and notes that land south of Miles Lane once formed part of the estate for Langham Park. However, this does not include land adjacent to New Road.</p> <p>Natural England is not aware of any allocated sites or development having the benefit of planning permission in the vicinity of the proposed boundary, and this has not been a determining factor in recommending the proposed boundary in this area.</p> <p><b>Conclusion</b>  No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>heritage. Furthermore, in abandoning a clear boundary marked by country lanes in favour of an admittedly “convoluted” one, Natural England has acted in apparent defiance of its own guidance.</i></p> <p><i>As described above, [Anon] argued for the AONB to be extended south to the boundary with the High Weald AONB, taking in the River Eden Biodiversity Opportunity Area, and believe this has been dismissed without adequate consideration. But, at the very least, we agree with the district council that the boundary should be drawn at the clear delineation of the railway line.</i></p> <p><i>In rejecting that, Appendix 16 appears to make yet another error, stating that “the railway swings southwards... as it crosses rolling farmland near South Godstone”. In fact, as the merest glance at a map establishes, it “swings” in no direction whatsoever, running straight as a die on either side of the village. It is again hard to see how such a mistake could have been made....’</i></p> <p><b>ANON-PQ5Q-KRRK-1</b></p> <p><i>‘I do not agree with the justification for deletion number 8 North of Miles Lane and New Road. The reason given states that the land was of lower quality. On the contrary, the area marked out for deletion contains two public footpaths as well as streams, woods and farmland. Gibbs Brook, which gives its name to farms and lanes in the area, dissects the land here on its way to feed into the River Eden. Overall the area is very picturesque, popular with locals, and a far cry from the justification</i></p>	

Boundary		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<p><i>given to it by Natural England. I urge you to reconsider.</i></p> <p><i>It should also be noted by Natural England that in the original consultation the Godstone Hills received a strong response from local residents, with a high percentage in favour agreeing that it had sufficient beauty to be designated as an AONB. Perhaps more telling are the themes identified by those who expressed the opposite views, who questioned restrictions to House Building and Development at the core of their reasoning. With changes proposed by the new Government this could be worth consideration.</i></p> <p><i>According to the consultation report, many people (including me) requested the inclusion of land as far as the Redhill – Tonbridge railway line. This proposal is only a quarter of a mile south of the Deletion 8 border on Miles Lane. One of the reasons for its exclusion appears to be some uncertainty with the former 'Garden Village' plan, which has now been rejected. It is disappointing that not only has this land been ignored, the boundary review has now cut it back further by proposing the deletion of the land north of Miles Lane / New Road as well.</i></p> <p><i>I was interested to read in my research that a 2017 document called 'Land at South Godstone Historical Assessment' describes the potential Historical Heritage of the area, including land immediately south of Miles Lane (and excluding the settlement of South Godstone) , belonging to the former estate of Langham Park, dating back to the 16th Century.</i></p>	

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>In conclusion, the area covered by Deletion No.8 has a strong claim to conform to many of the guidelines set out in this review. It has Landscape and Scenic Quality, a possible Cultural Heritage, and having Relative Wilderness and Tranquillity within its boundaries. I believe it is a very desirable area that deserves to be protected for its natural beauty.'</i></p> <p><b>ANON-PQ5Q-KRTD-V</b></p> <p><i>'We are tenant farmers and farm the land North of New road, this includes both the land proposed to be deleted and other fields that remain in the proposed expansion. I feel that the justification given for removing the four fields is unfounded. We farm 3 of the 4 fields due to be deleted. They are farmed in a rotation and the cropping and management of them is the same as the ones which have been left in. You will note that the field boundaries have not changed since WW2 and our family has farmed this land for over 60years.</i></p> <p><i>The permanent pasture that runs along Gibbs Brook is managed in the same way in the now deleted field as in the remaining fields.</i></p> <p><i>Dead trees have been have where possible been left standing to support the thriving ecosystems in our hedgerows and along the Brook. We have left patches of thistles and nettles in our pasture which has then become a breeding ground for peacock butterflies. We have skylarks nesting in the arable fields, Kestrel and Owls which hunt from New Roads telegraph poles and along the Brook, Buzzards and Kites that circle those fields, Field Fare that enjoy the</i></p>	

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>arable crops and Yellow Hammers that inhabit the hedges along New road, Tandridge [Hill] lane and Miles lane. Field mice, Hare's, Badgers and Deer all inhabit those fields. Kingfishers have also been seen fishing along the Brook there, flying at speed under the New Road bridge.</i></p> <p><i>I have attached images taken in an of the fields, d5e4 is a drone image which shows there is no difference between the fields that have been left in and the one now deleted. The road to the left of the image is New road as it joins Miles Lane and the A22 runs along the top of the photo. IMG 2371 is one of many that I have of our cattle being moved between fields.'</i></p> <p><b>ANON-PQ5Q-KRJ4-2</b></p> <p><i>'With nearly all of these deletions it really looks as though bites are being taken out to allow for development, especially where it makes a funny dent in the boundary of the existing AONB.'</i></p>	
<p><b>Exclusion of allocated land Lambs Business Park and exclusion of Maple Wood and field parcel to the west (formerly Seven Acre Wood)</b></p>	<p><b>ANON-VUXE-WSKZ-Q</b> provided a detailed response which has been summarised below:</p> <p><b>Natural Beauty</b></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"> <li>Lambs Business Park contains large incongruous features which affect land adjacent.</li> </ul>	<p><b>Commentary</b></p> <p><b>Planning</b></p> <p>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 <i>'suitable for a full range of potential waste management facilities'</i> and <i>'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'</i>. Under landscape it notes that <i>'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'</i>. Lambs Business Park is also a Strategic Employment Site within the Tandridge Core Strategy (Oct 2008).</p>



Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> <li>It is an allocated site for a waste facility in the Surrey Waste Plan.</li> <li>Area is not tranquil due to the railway, business park and hydrocarbon extraction facility to the southeast.</li> <li>Maple Wood is relatively recently planted and not ancient.</li> <li>No designated heritage assets.</li> <li>Includes land which forms part of the business park – live railway siding.</li> </ul> <p><b>Desirability</b></p> <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><b>Boundary</b></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>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><b>Candidate Area</b></p> <p>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 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><b>Implications of designation on delivery of current planning allocations</b></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>

Boundary		
Theme	Representations	Natural England Commentary
	<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>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><b>A further late respondent</b> 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</i></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 <b>ANON-VUXE-W5UR-U (Surrey County Council)</b>.</p> <p><b><u>Implications of designation on defective functioning of the railway</u></b></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 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 <b>ANON-VUXE-W5UR-U (Surrey County Council)</b>.</p> <p><b><u>The Boundary</u></b></p> <p>Natural England acknowledges that an alternative boundary could follow South Park Lane and then Four Acre Wood as suggested by respondent <b>ANON-VUXE-WSKZ-Q</b> 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>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>the consultation material which takes this issue of waste management and the use of rail freight into account.'</i></p> <p>In contrast <b>ANON-VUXE-W5UR-U (Surrey County Council)</b> 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 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 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 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><b>Conclusion</b> Minor deletion and refinement of the boundary in the vicinity of the Bletchingley railway tunnel.</p> <p>(Deletion 9 – Refer to Figure 24b)</p>

Boundary		
Theme	Representations	Natural England Commentary
Support for the proposed Deletion 9	<p>Of the 37 responses received for this area, 1 supported Deletion 9, as follows:</p> <p><b>ANON-PQ5Q-KRBG-D</b></p> <p>Anon is <i>'supportive of the amendments proposed in the current consultation....</i></p> <p><i>The revised boundary in this location is supported by [Anon]. They consider that the land that is to be excluded to the west of the Business Park:</i></p> <ul style="list-style-type: none"> <li><i>fails to meet the natural beauty criterion required for inclusion within a National Landscape (AONB);</i></li> </ul> <p><i>and</i></p> <ul style="list-style-type: none"> <li><i>fails to be listed as an area that is desirable for inclusion in an amended boundary....</i></li> </ul> <p>[Anon] <i>agrees with the amendment proposed on Figure 24.b of the 2024 Consultation Analysis, to not include this area within a revised and extended boundary for the Surrey Hills National Landscape (AONB) designation.....</i></p> <p>[Anon] <i>considers that the revised and amended boundary in the Godstone Hills area of the wider Surrey Hills National Landscape (AONB) is appropriate and meets Natural England's guidance.'</i></p> <p>Respondent <b>ANON-PQ5Q-KRBG-D</b> also raised concerns regarding planning matters specific to their</p>	<p><u>Commentary</u></p> <p>Natural England acknowledges the support for this deletion.</p> <p>Some respondents disagreed with Deletion 9 and these are set out below.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p>interest. These issues are noted but have not been repeated here, given the respondent's support for the proposed amendment.</p>	
<p>Object to proposed Deletion 9 and wish to comment on the boundary to include more land</p>	<p><b>Of the 37 responses received for this area, 3 objected to Deletion 9 and provided a reason for their view including comments on the boundary, as follows:</b></p> <p><b>ANON-PQ5Q-KRHH-M (Tandridge District Council)</b>  <i>'Tandridge District Council understands the reasoning for the proposed boundary not following the physical boundary provided by the railway tunnel in line with Ordnance Survey advice, however, it is not considered that this is relevant for the purpose of defining an AONB boundary. It is felt that, given the Suffolk Coast &amp; Heaths AONB Boundary Variation example in Appendix 6 whereby the boundary "continues north along the railway line" the proposed boundary at Godstone could also be bounded by the railway line. Notwithstanding this, the analysis report appears contradictory to the deletion – in regard to Maple Wood, the report acknowledges that following a suggestion by ANON-VUXE-WSKZ-Q, taking a different boundary would exclude Maple Wood. Maple Wood is in part, ancient woodland with the whole woodland designated as a Site of Nature Conservation Interest. This would therefore meet the Natural Heritage feature test set out in the guidance document. The analysis report also offers support for the land south of the railway line, going on to state</i></p>	<p><b>Commentary</b></p> <p>Respondent <b>ANON-PQ5Q-KRHH-M (Tandridge District Council)</b> makes a number of specific observations which are considered in turn below:</p> <p><b><u>Use of the railway line for the boundary</u></b></p> <p>Natural England agrees that a boundary to an AONB can follow a railway line, as was the case in the Suffolk Coast and Heaths. Natural England Guidance also states on page 23 that <i>'where there are embankments or cuttings the boundary should be drawn along the outer edge or fence line and embankments/cutting excluded.'</i> The boundary was not taken to the railway in the South Godstone area because the land immediately to the north of the railway was not considered to meet the Natural Beauty Criterion.</p> <p><b><u>Maple Wood</u></b></p> <p>Natural England agrees that Maple Wood is an SNCI and is, in part, ancient woodland. It therefore comprises a feature of interest on the edge. The Guidance is clear that these should be included <u>where practical</u>. The proposed boundary to the north of the woodland is put forward following a review of all factors relevant to this location.</p> <p><b><u>Land to south</u></b></p> <p>Natural England agrees that the land south of the railway is considered to meet the Natural Beauty Criterion, but it also notes that it is a landscape in transition, moving away from the greensand ridge to the north. Guidance states that within a transition, the boundary should be drawn towards the high-quality end, i.e. it should be drawn</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>that Natural England disagrees with the assertion that the land does not meet the natural beauty criteria. As stated, this land was also identified in the Natural Beauty Assessment Report as having scenic quality and having relatively strong natural beauty – it is therefore not understood why this land would now be removed given that the assessment used by Natural England to define the land within the boundary suggest it is of significant enough quality to be included.'</i></p> <p><i>'For the sake of clarity, Tandridge District Council would like to make it clear that it is in full support of all the proposals within the second consultation. This includes all proposed amendments, additions, and deletions; in regard to the deletions the Council would like some clarification as stated within the response. This should not be seen as opposing of the proposed deletions.'</i></p> <p><b>ANON-PQ5Q-KR8B-X</b>  <i>'This land immediately adjoins areas of valuable amenity and I consider it to be an integral whole.'</i></p> <p><b>ANON-PQ5Q-KR4A-S</b>  <i>'[Anon] objects to the deletion of this land, and once more finds it hard to understand the rationale behind the decision. In Appendix 16, Natural England demolishes arguments made in favour of its removal - including citing an authoritative rebuff from Surrey County Council – but then goes on to exclude it anyway. And it does so despite confirming that the</i></p>	<p>conservatively. Natural England sets out on pages 59-60 above, that the proposed boundary is an alternative line within the transition which is more conservative.</p> <p><b><u>Conclusion</u></b>  No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>deleted area meets then [the] natural beauty criteria for an AONB.</i></p> <p><i>There might perhaps be some logic in withdrawing the boundary line so that it follows the path of the railway even when it is in the tunnel, were it not for the fact that in the case of the land north of New Road and Miles Lane above such a hard boundary was abandoned in favour of a much weaker, less well defined one, while the case for extending the AONB to the same railway line was rejected. One again this decision damages the credibility of the process.'</i></p>	
<p><b>Exclude the land within Candidate Area for EA10a</b></p>	<p><b>ANON-PQ5Q-KR3X-F</b></p> <p><i>'there is an overriding concern that the Proposed Candidate Area (Godstone Hills) and in particular Evaluation Area (EA 10a) under consideration does not meet the requisite criteria to justify their inclusion within the Surrey Hills National Landscape (AONB) Boundary variation. While they may exhibit certain features of interest, the following factors underscore its exclusion....</i></p> <ul style="list-style-type: none"> <li><i>• Much of this area has a relatively degraded condition as a result of fragmentation by road infrastructure, built development, mineral extraction and golf courses.</i></li> <li><i>• the area lacks the distinctive physical and visual characteristics that one would reasonably associate with the wider Surrey Hills National Landscape (AONB) designation, while locally important, they do not achieve the exceptional qualities necessary to merit national designation.</i></li> </ul>	<p><b>Commentary</b></p> <p>Following review of respondent <b>ANON-PQ5Q-KR3X-F</b>'s submission, Natural England has concluded that this respondent seeks the exclusion of land between Tandridge Hill Lane and Oxted, north of the A25, i.e. land which was defined as a Candidate Area following assessment of natural beauty for Evaluation Area 10a.</p> <p>Natural England notes that the respondent makes reference to the Evaluation Area when presenting arguments for the area not being designated as AONB. However, not all of the Evaluation Area is proposed for designation. Only a small portion is proposed for inclusion in the northeast of the area. The Natural Beauty Assessment set out in detail the reasons why this area had the highest level of Natural Beauty and why overall it was considered to qualify for designation. Natural England notes that a significant number of the examples and photographs included in the submission by respondent <b>ANON-PQ5Q-KR3X-F</b> relate to landscape which is not proposed for inclusion within the AONB. Natural England also notes that the respondent relies upon the Landscape Institute publication TGN20/21. Relevant guidance for assessing land for national designation is the Natural England Guidance and not TGN20/21.</p> <p>Natural England also notes planning application (2020/690) for a new crematorium off Barrow Court Road which was refused by Tandridge District Council and allowed at</p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> <li><i>The area's landform, vegetation patterns and built environment diverge from the cohesive characteristics of the Surrey Hills.</i></li> <li><i>The urban influences and human interventions that dominate within this landscape have substantially altered this area's integrity, such that it cannot be reasonably justified to form a natural extension of the AONB.</i></li> <li><i>landscape offers very little in terms of cultural heritage, particularly where historic field patterns have been disrupted by development of roads, buildings, golf courses and extensive mineral extraction.</i></li> <li><i>Contribution to the natural beauty of the area is also limited due to the dominance of built development, minerals extraction and road infrastructure.</i></li> <li><i>This is a landscape which is susceptible to fragmentation caused by transport and land use change which also undermines perceptions of tranquility</i></li> <li><i>incongruous features - the urban fringe land uses and mixture of human activities and interventions that are located between the settlements of Godstone to the west and Oxted to the east, including utilities depots, industrial storage depots, golf courses &amp; development, former sand extraction mixed agriculture extensive woodland, intense horse grazing, future baseline (e.g., crematorium), and both motorways and A-road highway corridors and sporadic</i></li> </ul>	<p>appeal in August 2021 (APP/M3645/W/21). The development has most recently been the subject of a High Court Appeal which was refused in March 2025. Development of the site will therefore now take place. Natural England notes that the site lies within the proposed boundary extension between Tandridge Hill Lane and Barrow Court Road. Natural England notes that the Inspector concluded the proposed development would bring about a marked change to the site's appearance but that the design of the proposed buildings would '<i>respect the countryside context</i>' and that the proposals would be '<i>visually attractive</i>' and siting and landscaping would '<i>allow it to assimilate satisfactorily into its surroundings and countryside setting</i>'. Natural England agrees that this approved development would not undermine the quality of the landscape in this Extension Area.</p> <p>Furthermore, Natural England is of the view that the technical assessments make explicitly clear the issues which exist in this area, and the rationale for the boundary as defined. Natural England does not accept that the Natural Beauty Assessment Report does not distinguish the extent to which the landscape is fragmented by incongruous features, and those parts which can satisfy the Natural Beauty Criterion, if any. The Natural Beauty Assessment Report sets this out on page 159. Furthermore, the Candidate Area map for EA 10a clearly illustrates that not all of the Evaluation Area qualifies for this very reason.</p> <p>Natural England Guidance is clear that not all areas of land proposed for designation will meet the designation factors to the same degree. Taken as a whole, Natural England is satisfied that the part of EA10a proposed for designation has sufficient qualities to merit designation along with the greensand ridge of the Godstone Hills further to the southwest, as proposed.</p> <p>The respondent asks specifically why Godstone Golf Course is excluded but not Tandridge Golf Course. Natural England, in its assessment of natural beauty, does not consider the merits of individual golf courses but rather considers land in relation to the natural beauty factors. This requires considering a tract of land which may include golf course use. The reasons why Godstone Golf Course was not included is set out on pages 21-22 above. Tandridge Golf Course was noted in the Natural Beauty Assessment page 145 as '<i>well integrated within a former parkland and is</i></p>



Boundary		
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	<p><i>elements of built form, would cumulatively dilute the prospect of Natural Beauty within the Evaluation Area.'</i></p> <p><i>'In conclusion, the proposed Candidate Area forming the Godstone Hills Extension and Evaluation Area (EA 10a) do not meet the high threshold required for inclusion within the Surrey Hills National Landscape (AONB). The application of 'wash-over', which should only be applied in exceptional circumstances, into this area would certainly risk undermining the designation's integrity, potentially diluting its focus away from areas that truly are deserving of this level of protection. Furthermore, in absence of compelling evidence to justify inclusion, this Evaluation Area should not be considered, ensuring that the AONB fundamentally retains the highest landscape quality and significance.'</i></p>	<p><i>generally screened from external view'. It was subsequently included within the proposed boundary.</i></p> <p>Natural England has reviewed the decision to include Tandridge Golf Course in light of the questions raised by respondent <b>ANON-PQ5Q-KR3X-F</b>. Natural England remains of the view that the landscape south of the A25 and including the Tandridge Golf Course expresses scenic qualities associated with its mature woodland, and distinct varied topography associated with the greensand geology as well as overt signs of former parkland character. In comparison, land between the M25, A22 and A25, which includes the Godstone Golf Course is less distinct topographically. Here, incongruous features and a variety of land uses (including oil well, commercial development, former motorway compound and golf course) has resulted in a more open and fragmented character. Overall, this tract of land, including the Godstone Golf Course, is not considered to meet the Natural Beauty Criterion.</p> <p>Having reviewed the evidence submitted by respondent <b>ANON-PQ5Q-KR3X-F</b> and previous assessment work, Natural England remains of the view that this area meets the Natural Beauty Criterion, and that pockets of lesser quality land are not sufficient to undermine the wider area of qualifying land. Natural England also considers the boundary to be robust.</p> <p><b>Conclusion</b></p> <p>No change.</p>