

## Appendix 12: Happy Valley

Please refer to Figure 21b

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

### Overview

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

Natural Beauty	Responses
Yes	166
No	1
Not sure	2

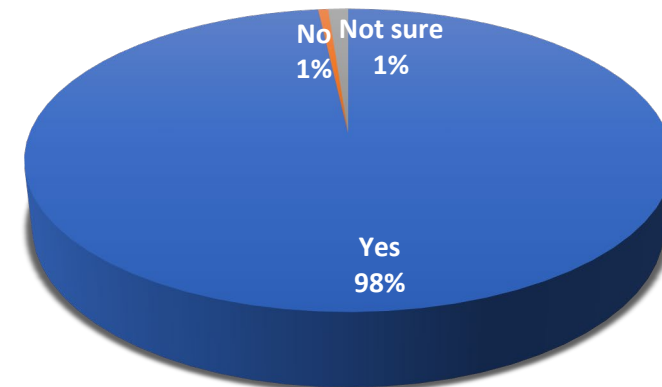
Of the 169 respondents who answered Question C1, 166 respondents (98%) felt that the Happy Valley Extension Area has sufficient natural beauty to be designated as AONB.

Only 1 respondent answered no, this respondent answered no to this question for all Extension Areas. 2 respondents (1%) answered not sure but only one gave a reason which was views east over housing areas.

In terms of desirability, respondents advanced arguments in support, mainly relating to the need for protection from development, threats to integrity and value of community access to open spaces. Other respondents advanced arguments against tighter planning restriction,

increased house prices and that the area is already protected. These are addressed in Appendix 2.

Happy Valley - Sufficient natural beauty to be designated



Question C5: Does the respondent agree with the proposed boundary for the Happy Valley Extension Area?

Boundary	Responses
Yes	130
Yes, but I wish to suggest an alternative	23
No	4
Not sure	13

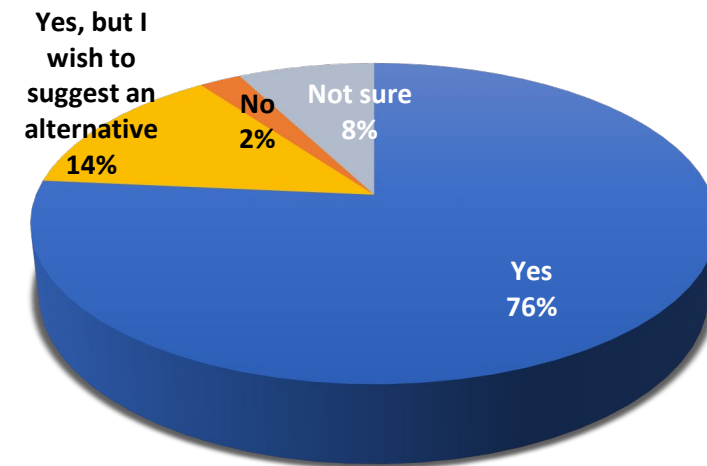
This area attracted a large number of responses. Of the 170 respondents, 130 respondents (76%) agreed with the proposed boundary for the Happy Valley Extension Area and 4 respondents (2%) did not. 23 respondents (14%) agreed but wished to suggest an alternative boundary for the Extension Area, many providing supporting evidence. 13 respondents (8%) were not sure, reasons included fear of loss of views, restrictions regarding dog walking or uncertainty regarding the extent of the Extension Area.

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

- Northern tip of the South London Downs National Nature Reserve
- Hillside west of the A23 (note this land formed part of EA7d but is discussed here due to intervisibility with Farthing Downs and similar issues associated with New Hill)
- New Hill to the east of Farthing Downs
- Woodplace Farm fields to the west of Farthing Hill
- Surrey National Golf Course
- Whole of Chaldon and pasture fields to the south including Roffes Lane
- Coulsdon Common, Kenley Airfield, Kenley Common, Dollyper's Hill and Coulsdon Manor Golf course
- Riddlesdown Common, Ashley Berry and Warlingham Court Farm

There are no requested exclusions.

Happy Valley - Agreement with the proposed boundary



During the second (2024) statutory consultation, responses were received regarding **Addition 8: Land west of Farthing Down, and Addition 9: Land east of Farthing Down**, as well as **Deletion 5: Land at Coulsdon Common**. Natural England has reviewed these responses and provided further commentary in blue below.

Further responses were received relating to **Coulsdon Common/ Kenley Common/ Riddlesdown, and land between the existing AONB and Happy Valley**. Natural England has reviewed these areas and provided further commentary in blue below.

Natural Beauty		
Theme	Representations	Natural England Commentary
<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-WEZ4-J</b>  <i>'The rolling nature of the landscape here provides views into Coulsdon, but also Croydon and on a clear day central London, as well [as] the dips providing a real sense of being deep in the country.'</i></p> <p><b>ANON-VUXE-WMG3-6</b>  <i>'Happy Valley &amp; Farthing Downs is an important area of chalk grassland &amp; gives extensive views over central London... it is located high above the surrounding area with fantastic views &amp; has a variety of habitat including chalk grassland &amp; woodland.'</i></p> <p><b>ANON-VUXE-WMJ3-9</b>  <i>'It's a haven of natural beauty and wildlife, a favourite place for people to enjoy leisure time.'</i></p> <p><b>ANON-VUXE-WS18-U</b>  <i>'[Anon] unanimously support[s] the proposal to expand the existing Surrey Hills AONB with a particular reference to the proposed Happy Valley and Caterham Woods extension proposals.'</i></p> <p><b>ANON-VUXE-WEWD-Y</b>  <i>'The Happy Valley and neighbouring Farthing Downs form a complimentary landscape of chalk dry valley and a chalk, whaleback ridge. Farthing Downs, a chalk ridge of open downland, has Red Sussex cattle, and wildflower-rich chalk grasslands, with many butterflies and insects. It</i></p>	<p><b>Commentary</b></p> <p>Natural England agrees that land within the proposed Extension Area meets the natural beauty criterion for designation as AONB and that additional evidence provided by respondents supports the findings of the Natural Beauty Assessment.</p> <p>Natural England has also taken account of detailed responses requesting changes to the boundary and proposes some amendments. These are set out below.</p>

Natural Beauty		
Theme	Representations	Natural England Commentary
	<p><i>has Celtic Fields, and Anglo-Saxon burial mounds. The sequestered Happy Valley, with its wide and open valley bottom and valley side fields, which are covered with sheets of wildflowers in Spring and Summer, are sheep grazed. The setting of the Happy Valley is beautifully contained at the margin, on both sides, by abundant woodland, which acts as a backdrop to views across, or as a frame to superb long views along the valley from the open ridge of Farthing Downs.'</i></p> <p><b>ANON-VUXE-WEWD-Y</b>  <i>'Farthing Downs and Happy Valley is clearly much more than "Green and Pleasant English Countryside"-- it is truly outstanding—a very rural, natural landscape, which is not spoiled by its location on the very edge of London.'</i></p> <p><b>ANON-VUXE-W5BW-D</b>  <i>'This area, in particular Happy Valley, Farthing Downs and the area around Chaldon Church and north of this has excellent landscape value and is a highly treasured asset for local people.'</i></p> <p><b>ANON-VUXE-WE39-G</b>  <i>'Happy Valley is beautiful and captivating. The landscape is idyllic and the bluebell fields enchanting. It's a centre of calmness and a real escape from the bustle of Croydon which is just a few minutes away. The sunsets stop you in your tracks with their colourful hues of red, orange and pink. There is plenty of room for walking and cycling through its natural splendour and in the winter it transforms into a snowy wonderland filled with the laughter of children sledging down its slopes. Happy Valley is indeed a place where nature's beauty leaves you with an urge to return again and again.'</i></p>	

Natural Beauty		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<p><b>ANON-VUXE-WE5H-1</b>  <i>'This is a beautiful area of rolling hills, grasslands and woods. There is extensive walking from Happy Valley. It should receive the status it deserves and be available to all to enjoy. It is one of the few places with a lot of parking and good public transport links. It is a gem.'</i></p> <p><b>ANON-VUXE-WM7D-7 (London Borough of Croydon),</b>  <i>'Special rolling landscape valley with chalk grassland, woodland belts and open un-intruded skylines, void of new development.'</i></p> <p><b>ANON-VUXE-WEPN-2</b>  <i>'Striking and distinctive scenery which reveals the geology and geomorphology of the area, provides relative tranquillity and contributes to the story of the Wandle Valley and its upper catchment of chalk landscapes and dry valleys.'</i></p> <p><b>ANON-VUXE-WMWU-R</b>  <i>'It's a unique area of diverse chalk grasslands rich in many species of herb which are uncommon in London, and the nationally scarce man orchid and round-headed rampion have also been recorded. All the characteristics of ancient woodlands.'</i></p> <p><b>ANON-VUXE-WMBR-Z</b>  <i>'the natural beauty is amply evident in the photo.'</i></p> <p><b>ANON-VUXE-W5E7-G</b>  <i>'Wide and well-established Downland habitat with rare wild orchid species, etc.'</i></p>	

Natural Beauty		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<b>ANON-VUXE-W5GC-X</b> <i>'As many parts of it are accessible only on foot it retains a magical tranquillity which provides a wonderful restorative for the mental health of the local population.'</i>	
<b>The proposed extension does not meet the Natural Beauty Criterion</b>	<b>ANON-VUXE-W5T8-Z, ANON-VUXE-WEXE-1, ANON-VUXE-W5G7-J-Z, and ANON-VUXE-W5ET-D</b> all considered the area did not meet the Natural Beauty Criterion, although no justification was given.	<b><u>Commentary</u></b> Natural England disagrees that the land identified for designation does not meet the Natural Beauty Criterion for the reasons set out in the Natural Beauty Assessment Report.

Boundary		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
<b>General agreement with proposed boundary</b>	<p>Many 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-WM4V-P</b> <i>'Seems to follow pretty obvious boundaries.'</i></p> <p><b>ANON-VUXE-W5QZ-Y</b> <i>'I live in and know the area very well and to my lay mans eye the proposed boundaries look to be about right.'</i></p> <p><b>ANON-VUXE-WMEV-7</b> <i>'The boundary makes sense.'</i></p> <p><b>ANON-VUXE-WMXU-S</b> <i>'It fits with natural boundaries.'</i></p> <p><b>ANON-VUXE-WSQR-N</b> <i>'Members support the inclusion of part of Farthing Downs in the proposed Happy Valley extension to the Surrey Hills AONB and the proposed boundary'.</i></p>	<p><b><u>Commentary</u></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		
<b>Include northern tip of South London Downs National Nature Reserve</b>	<p><b>ANON-VUXE-W5N2-M</b> <i>'The boundary at Farthing Downs continues down to the triangular point where Ditches Lane meets Marlpit Lane.'</i></p>	<p><b><u>Commentary</u></b></p> <p>Natural England notes that the boundary of the National Nature Reserve extends northwards to meet Marlpit Lane comprising a northern tip of rough grassland and scrub. The proposed boundary follows the extent of open access land, SSSI designation and Scheduled Monument. Natural England considers that the post and rail fence and cattle grid, which marks the edge of the common, is the most appropriate</p>

Boundary		
Theme	Representations	Natural England Commentary
		<p>boundary for the proposed AONB designation in this instance, given that further north the land becomes a narrow finger which, in landscape and perceptual terms, is influenced by its urban context.</p> <p><b>Conclusion</b> No change</p>
<p><b>Include open hillsides west of A23 (Hooley Estate and fields south of school)</b></p> <p><b>Note this area formed part of EA7d but is discussed here due to intervisibility with Farthing Downs and A23 corridor issues</b></p>	<p><b>ANON-VUXE-WMC7-6</b> <i>'I would only ask that a potential extension to this area be considered to cover the postcode CR5 3EH and small surrounding area. The houses here back onto and sit in between farmland which is a thorough fare for wildlife and such. It would be great if they could also be protected.'</i></p> <p><b>ANON-VUXE-WEMY-A and ANON-VUXE-WEWD-Y</b> made the case for the inclusion of additional open hillsides which are visible from Farthing Downs and which lie to the north and west of the A23. These hillsides include Cane Hill, Portnalls Road Field and settlement of Hooley House Estate/Hooley Valley.</p> <p>Key reasons include:</p> <ul style="list-style-type: none"> <li>• Intervisibility with Farthing Downs.</li> <li>• Visually important open fields and wooded ridgelines.</li> <li>• Interrelationship with Farthing Downs creating balanced views and harmony.</li> <li>• Part of the setting of Farthing Downs.</li> <li>• Foreground and prelude to Farthing Downs.</li> </ul>	<p><b>Commentary</b></p> <p>This area formed part of EA7d in the Natural Beauty Assessment. Under scenic quality the assessment stated <i>'Scenic quality is in transition and becomes significantly reduced towards the fringes of the area, where urban influences are more apparent, such as the edge of built-up areas, and busy road corridors.'</i> The south western part of this area was included within the proposed Candidate Area as a result of the Elmore Road Residential Area of Special Character which is a feature of interest on the edge and contributes to the scenic qualities of the area and given its location between the existing AONB and proposed Extension Area further west. However, the northern more open slopes were excluded given their urban context and open aspect which is substantially affected by noise from the A23 corridor and surrounding development. This is confirmed in the Boundary Considerations Report page 31 which states <i>'the boundary was drawn further to the east in order to include historic buildings of interest and a small valley between High Road, Elmore Road and Hogcross Lane.'</i></p> <p>The open slopes further north were also discussed in the assessment of Evaluation Area 8a [EA8a]. At page 111 of the Natural Beauty Assessment Report it states <i>'The scenic qualities of the steep slopes which face into the valley containing the A23 have been eroded by its use as a principle road corridor and by the urbanising influences of adjacent development.'</i> On page 112 under tranquillity it states <i>'However, to the west the landscape drops into a valley containing the A23 corridor, where traffic noise and views across built-up areas are prominent.'</i> It goes on to conclude at page 114 that <i>'The fringes of this area to the east and west including Chaldon, Netherne and the slopes of the A23 corridor, are not regarded as meeting the natural beauty criterion. These conclusions are pertinent to the A23 corridor slopes between Portnalls Road and the A23 which have similarly been excluded.'</i></p>



Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> <li>Unique history including water tower of Cane Hill (landmark) and cultural associations.</li> <li>Railway line and Brighton Road (A23) are not visible.</li> <li>First area of countryside for people coming out of London.</li> </ul> <p><b>Desirability:</b></p> <ul style="list-style-type: none"> <li>Proximity of these open areas to southern London – ease of access</li> <li>AGLV exists in Surrey but not Croydon – an anomaly which should be addressed by the AONB boundary review.</li> <li>Include the ‘context’ landscape on which Farthing Downs and Happy Valley depend as ‘threshold’ landscapes.</li> </ul>	<p>This area has been reviewed, and Natural England has considered the new evidence submitted. The following points of clarification are made:</p> <ul style="list-style-type: none"> <li>Natural England Guidance (Appendix 4) is clear that cultural associations must relate to the landscape including where landscape has inspired people in terms of writing and literature, depiction of the landscape in art or where the landscape has associations with people or events/traditions which contribute to perceptions of natural beauty.</li> <li>The areas which are the subject of these responses form visually important open hillsides when viewed from Farthing Downs. Nevertheless, they are isolated areas which are physically separate from the core areas of qualifying land by development and infrastructure. This means that these areas are fragmented and are also influenced by adjoining incongruous features. Natural England Guidance is clear at para 5.3 7<sup>th</sup> bullet that fragmentation may affect the ability of a tract of land to qualify.</li> <li>Natural England acknowledges that these areas of landscape form an important setting to the proposed AONB extension and may be the first area of countryside on leaving London. Visual association is not sufficient to justify designation of land, nor is the first experience of countryside on leaving London. The land must meet the Natural Beauty Criterion.</li> </ul> <p>Natural England remains of the view that the open slopes beyond Farthing Downs do not meet the Natural Beauty Criterion. This does not diminish the important role they play as prominent open countryside which forms a setting to qualifying areas (and the extent to which Para 182 of the NPPF would apply) nor the importance of the areas as open natural green space for local residents.</p> <p><b>Conclusion</b> No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
<p><b>Include Woodplace Farm Fields to the west of Farthing Hill</b></p>	<p><b>ANON-VUXE-WMBH-P</b> Reasons given include:</p> <p><b>Natural Beauty:</b></p> <ul style="list-style-type: none"> <li>• Area is grazed by cattle.</li> <li>• Designated public open space in 2006.</li> <li>• Forms part of the rolling hill landscape.</li> <li>• The lower field contains a chalkland meadow.</li> </ul> <p><b>Boundary:</b> The hedge between the upper and lower fields is proposed as an alternative boundary.</p>	<p><b>Commentary</b></p> <p>The Natural Beauty Assessment considered this area as part of EA8a (pages 111-114). Under Landscape Quality it notes <i>‘The open common of Farthing Downs continues along a shoulder of elevated land. However, development has encroached into the adjacent lower lying land during the first half of the 20<sup>th</sup> century, eroding the rural context of the northern part of the downs.’</i></p> <p>The fields west of Farthing Downs were reviewed. Here the land was considered to form a single uninterrupted sweep of landscape from Farthing Downs which dips into a shallow valley and rises again to the urban edge. Natural England therefore considers that this land is not influenced by the A23 corridor or adjacent urban areas which are set further back and screened by vegetation. The fields which form open downland and are under active grazing management form part of an uninterrupted sweep of landscape.</p> <p>On balance, and given the unity between this land and Farthing Downs, Natural England has concluded that the boundary should be drawn further west to include these fields of open chalk grassland. The boundary follows hedgerows and property boundaries which are clear boundary features. Fields further north, which are subdivided for equestrian use and are more influenced by the proximity of the urban edge, are excluded.</p> <p><b>Conclusion</b> Minor addition to include fields to the west of Farthing Downs.</p> <p>(Addition 8 – Refer to Figure 21b)</p>
<p><b>Support for proposed Addition 8: Land west of Farthing Downs</b></p>	<p>67 respondents agreed with the designation of Addition 8, some providing reasons for their views as follows:</p> <p><b>ANON-PQ5Q-KR8G-3 (City of London Corporation)</b></p>	<p><b>Commentary</b></p> <p>Natural England acknowledges the reasons given by respondents in support for this addition.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>'The City of London Corporation is the owner of the land concerned which is managed by the Coulsdon Commons Registered Charity. At a meeting of the Epping Forest and Commons Committee that oversees the City's responsibility for managing the Coulsdon Commons on Thursday 28th November 2024 the members agreed to the recommendation</i></p> <ul style="list-style-type: none"> <li><i>• To support the inclusion of part of Farthing Downs in the proposed Happy Valley extension to the Surrey Hills AONB. (this was in reference to areas A8 and A9)'</i></li> </ul> <p><b>ANON-PQ5Q-KRRY-F (London Borough of Croydon)</b>  <i>'The two areas for inclusion A8 and A9 are supported as it is recognised that the land forms a single uninterrupted sweep of landscape from Farthing Downs which dips into a shallow valley and rises again to the urban edge. Natural England rightly concluded that this land is not influenced by the A23 corridor or adjacent urban areas which are set further back and screened by vegetation. The fields which form open downland and are under active grazing management form part of an uninterrupted sweep of landscape. For these reasons the two extensions A8 and A9 are consistent and supported.'</i></p> <p><b>ANON-PQ5Q-KRJT-2</b>  <i>'The area is a natural extension of the rolling landscape of Farthing Downs to the boundary of</i></p>	<p>2 respondents did not agree with the designation of Addition 8 but provided no reason for their view.</p> <p>3 respondents wished to comment on the proposed boundary, but none provided a comment. Natural England notes, therefore, that there are no responses specifying a change to the boundary in this area.</p> <p><b>Conclusion</b>  No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>residential properties on Woodplace Lane which it makes sense to include.'</i></p> <p><b>ANON-PQ5Q-KRN2-4</b>  <i>'This is clearly contiguous landscape quality linked by views and access to Farthing Downs, part of the rolling chalk landscape of the area.'</i></p>	
Include New Hill to the east of Farthing Downs	<p><b>ANON-VUXE-WMBH-P, ANON-VUXE-WS1R-N, ANON-VUXE-WEGQ-V, ANON-VUXE-W5BW-D.</b></p> <p>Reasons given include:</p> <p><b>Natural Beauty:</b></p> <ul style="list-style-type: none"> <li>• Managed through scrub clearance and sheep grazing.</li> <li>• Clearly visible from Farthing Downs.</li> <li>• Forms part of the rolling landscape of Farthing Downs and Happy Valley.</li> <li>• Rare wild flowers and pyramidal orchids.</li> <li>• Single line of housing on either side of Chaldon Way between Farthing Downs and New Hill, is in the bottom of the valley and does not affect the landscape views from Farthing Downs</li> <li>• Marks the entrance to Happy Valley.</li> </ul> <p><b>Desirability:</b></p> <ul style="list-style-type: none"> <li>• Designation of this area would add additional protection and maintenance.</li> </ul>	<p><b>Commentary</b></p> <p>The Natural Beauty Assessment considered this area as part of EA8a (pages 111-114). Under Landscape Quality it notes <i>'The open common of Farthing Downs continues along a shoulder of elevated land. However, development has encroached into the adjacent lower lying land during the first half of the 20<sup>th</sup> century, eroding the rural context of the northern part of the downs.'</i></p> <p>In particular the Natural Beauty Assessment noted on page 110 that <i>'Incongruous elements in this landscape include the A23 and railway to the west of the area as well as fingers of built development which extend into lower lying land e.g. Chaldon Way.....'</i></p> <p>It also notes on page 111 <i>'The narrow, rounded ridgeline of Farthing Downs forms the skyline in these views, and the built development within the northern part of the valley (along Chaldon Way) does not intrude.'</i></p> <p>In the Boundary Report on page 34 the assessment notes <i>'The strong topography and high levels of vegetation on the fringes of Happy Valley and along urban edges has enabled the boundary to be defined close to the built edge and as a result it often follows fence lines along the perimeter of properties.'</i></p> <p>The Boundary Report highlighted the transitional quality of the landscape where it lies adjacent to the urban areas. Natural England has reviewed the boundary to the east of</p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> <li>The natural beauty of Happy Valley and Farthing Downs depends upon adjacent areas.</li> <li>Would add complication of administration and delay.</li> </ul> <p><b>Boundary:</b></p> <p><b>ANON-VUXE-WMBH-P</b> put forward an alternative boundary:</p> <p><i>'Drive Road looks like a clear boundary so I can see why it was selected as the AONB boundary but on the ground it is just a footpath like many others.'</i></p> <p><i>The AONB boundary can be clearly demarcated by a footpath and line of trees which separates the western half of New Hill from the eastern half. This line of trees hides from view the more open eastern half which borders the built area.'</i></p> <p><b>ANON-VUXE-WEGQ-V</b> commented that:</p> <p><i>'There must be a natural not artificial boundary to the AONB.'</i></p>	<p>Farthing Downs. It acknowledges that although development of Chaldon Way intrudes on the landscape it is nonetheless set down in the landscape and the rising slopes to the east of Farthing Downs remain physically connected to Happy Valley to the south. Furthermore, the rising slopes east of Farthing Downs are part of the scenic composition of Happy Valley when seen from Farthing Downs. Natural England also notes that the proposed boundary by respondent <b>ANON-VUXE-WMBH-P</b> enables the flatter land adjacent to the urban area to be excluded.</p> <p>For completeness, and to ensure consistency of approach, Natural England has also reviewed the definition of the boundary further to the southeast. Here it has concluded that flatter less distinctive landscape has been included south of Coulston Road and that a more robust boundary can be drawn closer to the break in slope to Happy Valley which aligns with the Site of Special Scientific Interest. The boundary follows the edge of woodland and tracks.</p> <p><b>Conclusion</b></p> <p>Minor addition to include fields to east of Farthing Downs and deletion to exclude fields on more elevated, flatter land, south of Coulsdon Road, to ensure a consistent approach to defining the boundary.</p> <p>(Addition 9: Refer to Figure 21b)</p>
Support for proposed Addition 9: Land east of Farthing Downs	<p><b>69 respondents agreed with the designation of Addition 9, some providing reasons for their views as follows:</b></p> <p><b>ANON-PQ5Q-KR8G-3 (City of London Corporation)</b></p> <p><i>'The City of London Corporation is the owner of the land concerned which is managed by the Coulsdon</i></p>	<p><b>Commentary</b></p> <p>Natural England acknowledges the reasons given by respondents in support for this addition.</p> <p>2 respondents disagreed with the designation of Addition 9, but provided no reason for their view.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>Commons Registered Charity. At a meeting of the Epping Forest and Commons Committee that oversees the City's responsibility for managing the Coulsdon Commons on Thursday 28th November 2024 the members agreed to the recommendation</i></p> <ul style="list-style-type: none"> <li><i>To support the inclusion of part of Farthing Downs in the proposed Happy Valley extension to the Surrey Hills AONB. (this was in reference to areas A8 and A9)'</i></li> </ul> <p><b>ANON-PQ5Q-KRRY-F (London Borough of Croydon)</b>  <i>'The two areas for inclusion A8 and A9 are supported as it is recognised that the land forms a single uninterrupted sweep of landscape from Farthing Downs which dips into a shallow valley and rises again to the urban edge. Natural England rightly concluded that this land is not influenced by the A23 corridor or adjacent urban areas which are set further back and screened by vegetation. The fields which form open downland and are under active grazing management form part of an uninterrupted sweep of landscape. For these reasons the two extensions A8 and A9 are consistent and supported.'</i></p> <p><b>ANON-PQ5Q-KRJT-2</b>  <i>'This land includes New Hill which in my opinion is one of the most beautiful chalk downland flower meadows in East Surrey. A marvellous habitat for a wide range of butterflies and insects in the</i></p>	<p>3 respondents wished to comment on the boundary, but none provided a comment. Natural England notes, therefore, that there are no responses specifying a change to the boundary in this area.</p> <p><b>Conclusion</b>  No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>summer. There is no doubt in my mind that this area deserves the designation and protection of AONB.'</i></p> <p><b>ANON-PQ5Q-KRN2-4</b>  <i>'This is clearly contiguous landscape quality linked by views and access to Farthing Downs, part of the rolling chalk landscape of the area.'</i></p>	
<p><b>Include Surrey International Golf Course</b></p>	<p><b>ANON-VUXE-WSQD-7 and ANON-VUXE-WE22-8 (both identical submissions by Tandridge District Council), , ANON-VUXE-WEU9-J, ANON-VUXE-WEZP-E, ANON-VUXE-W58A-D, and ANON-VUXE-WEP2-6.</b></p> <p>Reasons given include:</p> <p><b>Natural Beauty:</b></p> <ul style="list-style-type: none"> <li>Peaceful, tranquil and relatively wild, containing ancient woodland.</li> <li>Golf club has [retained] much of the original features of the land.</li> <li>Distinctive and dramatic landform with framed views.</li> <li>Managed grassland allows landform to be appreciated.</li> </ul> <p><b>Desirability:</b></p> <ul style="list-style-type: none"> <li>Would prevent the owners of the golf club from failing to retain the natural beauty of the land.</li> </ul>	<p><b>Commentary</b></p> <p><b>Natural Beauty</b>  The Natural Beauty Assessment considered this area as part of EA8a. On page 110 it notes that <i>'In the east traditional agricultural land uses give way to recreational and urban fringe uses, such as the Surrey National Golf Club and equestrian uses and pony paddocks e.g. Hooley Farm.'</i> It goes on to state that <i>'In the south of the area heavy traffic along Rook Lane/B2031 which connects the A23, and Chaldon/Caterham undermines tranquillity locally.'</i></p> <p>The Candidate Area was subsequently defined to exclude the golf course although it is recognised that this area forms part of the upper reaches of the Happy Valley and comprises some dramatic slopes and longer distance views.</p> <p>The Boundary Considerations Report notes on page 34 that <i>'Ladn [Land] to the south of this was not considered to meet the natural beauty criterion due to the influence of the Surrey National golf course which has altered the downland character of the landscape, and coupled with the increasingly urban context, undermines natural beauty.'</i></p> <p>Natural England has reviewed this as a result of the consultation responses. Natural England notes that the golf course extends across the upper reaches of Happy Valley which forms two smaller tributary valleys with a ridge of higher land between, on which is located the club house and car park. Northeast of this are two waterbodies on relatively high land with one including a water fountain. All of these features are not</p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> <li>Would prevent development and destruction of wildlife.</li> <li>Helps avoid development creep from Croydon.</li> </ul> <p><b>Boundary:</b> Various boundary options were proposed.</p> <p><b>ANON-VUXE-WSQD-7</b> and <b>ANON-VUXE-WE22-8</b> (both identical submissions by <b>Tandridge District Council</b>) proposed a boundary up to the rear property boundaries in the east and along Rook Lane excluding Fryern Farm and extending west and south to also include the village of Chaldon.</p> <p><b>ANON-VUXE-WEU9-J</b>, <b>ANON-VUXE-WEZP-E</b>, <b>ANON-VUXE-W58A-D</b> and <b>ANON-VUXE-WEP2-6</b> did not suggest a specific boundary.</p>	<p>considered to reflect the natural qualities of the chalk valley. From some locations the adjacent urban edge is visible across the golf course comprising Chaldon to the west and Caterham to the east and south. Closer to the B2031 traffic noise intrudes.</p> <p>On balance, Natural England remains of the view that this area of land is transitional and that it has been influenced by golf course use and proximity to the urban edge despite its still strongly expressed chalk topography.</p> <p>Natural England also notes that, unlike the remainder of Happy Valley, this area is not designated a Site of Special Scientific Interest or Site of Nature Conservation Importance, and this further reinforces the lower weight of evidence supporting natural beauty. Natural England notes that some respondents eg <b>ANON-VUXE-WMC5-4</b>, acknowledge that the use of the valley as a golf course has impacted on its special qualities.</p> <p><b>Desirability</b> For land to be considered desirable to designate it must first meet the Natural Beauty Criterion. Given that the area is not considered to qualify in terms of its natural beauty, Natural England has not considered it in terms of desirability.</p> <p><b>Conclusion</b> No change.</p>
<p><b>Include whole of Chaldon and pasture fields to the south inc. Roffes Lane, up to the North Downs Ridge and Six Brothers Field</b></p>	<p><b>ANON-VUXE-WE22-8</b> and <b>ANON-VUXE-WSQD-7</b> (Tandridge District Council), <b>ANON-VUXE-WEU9-J</b>, <b>ANON-VUXE-WEAP-N</b>, <b>ANON-VUXE-WEZP-E</b>, <b>ANON-VUXE-WE1P-5</b></p> <p>Reasons given include:</p> <p><b>Natural Beauty:</b></p> <ul style="list-style-type: none"> <li>Roffes Lane is an ancient trackway</li> <li>Mature trees and hedgerows</li> </ul>	<p><b>Commentary</b></p> <p>This area was considered in the Natural Beauty Assessment Report as part of EA8a which noted '<i>linear development along lanes, coupled with urban fringe land use, has given this area a more peri-urban character.</i>' Natural England acknowledges that some rural qualities associated with the lanes and fields is evident but overall, it is regarded as transitional and not as intact as land to the north and west. It was subsequently excluded from the Candidate Area.</p> <p>This view concurs with the Surrey Landscape Character Assessment which notes that '<i>a significant proportion of the overall character area includes small parcels of land such</i></p>



Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> <li>• Small country roads of Doctors Lane, Church Lane and Rook Lane</li> <li>• Six Brothers Field has a sense of peace and tranquillity</li> <li>• Ancient woodland</li> <li>• Chaldon Church is a Scheduled Monument</li> <li>• Gently sloping fields</li> <li>• Limited expansion of Chaldon in the 20<sup>th</sup> century – retains village character</li> <li>• Not of suburban character</li> <li>• Chaldon Conservation Area</li> <li>• Part of the AGLV</li> <li>• Continuity with Farthing Downs and Happy Valley</li> <li>• Intact landscape structure of woodland and hedgerows</li> <li>• Listed buildings x 3</li> <li>• Character area CD4 'Chaldon Chalk Down with Woodland' sets out positive qualities.</li> </ul> <p><b>Desirability:</b></p> <ul style="list-style-type: none"> <li>• Address flooding issues along Roffes Lane</li> <li>• Designate as AONB while further legislation on nature recovery is developed.</li> </ul> <p><b>Boundary:</b>  <b>ANON-VUXE-WE22-8</b> and <b>ANON-VUXE-WSQD-7 (Tandridge District Council)</b> suggested an alternative boundary extending between the proposed extension and the existing AONB and with an eastern boundary following the defined urban edge but also the piecemeal development</p>	<p><i>as paddocks, associated with low density dwellings with well vegetated boundaries and hedgerows. The northern part of the character area encompasses the Surrey National golf course.' It goes on to state that 'low density residential development in the character area and the influence of adjacent settlement reduces tranquillity and remoteness.'</i></p> <p>Natural England does not agree that Chaldon Church is a scheduled monument, although it does note that the church is Grade I Listed and is included in the proposed extension. Although part of Chaldon is a Conservation Area, it is noted that across the area as a whole, there are relatively few listed buildings with much of the development being varied in age and character. Natural England accepts that Chaldon settlement is lower density and more rural than Caterham to the east but, nonetheless, the extent of development, coupled with equestrian uses, means that it has a more peri-urban character and lacks the rural characteristics and qualities found further to the north into the Happy Valley.</p> <p>Natural England does not consider the decision to exclude Chaldon village is inconsistent with the decision to include War Coppice Road within the Caterham Woods Extension Area. The landscape context and nature of development is not the same. Development at War Coppice Garden Village consists of 19<sup>th</sup> century and 20<sup>th</sup> century Arts and Crafts housing and has a strong architectural style and unity which contributes to local distinctiveness.</p> <p>Natural England agrees with respondent <b>ANON-VUXE-WS18-U</b> <i>'It is accepted regretfully that the boundary at Chaldon is influenced by the presence of urban edge and pony paddocks south of the village, which whilst relatively low density have created a degree of visual clutter with horse shelters, storage and post and rail fencing replacing hedgerows.'</i></p> <p>North of the existing AONB boundary at Willey Park Farm the land is sloping away towards the urban edge and is less dramatic. Nevertheless, Natural England accepts that the AONB boundary in this location does not follow a clear line on the ground. A more appropriate boundary lies to the south along Pilgrims' Lane, however that would</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p>around the entrance to the golf course along Rook Lane.</p> <p><b>ANON-VUXE-WE1P-5</b> Noted an inconsistency between the exclusion of Chaldon and the inclusion of War Coppice Road but also acknowledge there were 'some incongruous features within the village [Chaldon].'</p>	<p>require a small area of land to be de-designated. Natural England therefore does not recommend any change in this location.</p> <p><b>Conclusion</b> No change.</p>
<p><b>Include Coulson Common, Kenley Airfield, Kenley Common, Dollyper's Hill, Coulsdon Manor golf course</b></p>	<p><b>ANON-VUXE-WSKR-F (London Borough of Croydon), ANON-VUXE-WEU9-J, ANON-VUXE-WEEN-Q, ANON-VUXE-WS1R-N, ANON-VUXE-WEAP-N, ANON-VUXE-WEZ4-J, ANON-VUXE-WEGG-J, ANON-VUXE-WMG3-6, ANON-VUXE-WMJ3-9, ANON-VUXE-WEGQ-V</b></p> <p>Reasons given included:</p> <p><b>Natural Beauty:</b></p> <ul style="list-style-type: none"> <li>• Nature Reserve supporting populations of chalk grassland butterflies</li> <li>• Dollyper's Hill is cut by a dry valley</li> <li>• Mosaic of calcareous grassland, scrub and woodland</li> <li>• Kenley Lane bluebell woods and verges</li> <li>• Veteran trees on commons</li> <li>• Kenley Aerodrome is a [site] of cultural military heritage</li> <li>• Kenley Aerodrome is a beautiful open space with species rich grassland</li> <li>• Peacefulness, joy and delight</li> </ul>	<p><b>Commentary</b></p> <p>Natural England considered this area as part of EA8b in the Natural Beauty Assessment Report. It concluded on pages 117 that '<i>The fragments of semi natural greenspace where there is wood pasture and chalk grassland are highly valued in the context of South London. However, these landscapes comprise relatively small pockets, fragmented by an urban context and physically separated from the wider AONB by Caterham and Chaldon.</i></p> <p><i>'On balance these landscapes are not considered, either individually or collectively, to form land which meets the natural beauty criterion and they have therefore not been included within the Candidate Area.'</i></p> <p>Natural England has reviewed this area in light of the consultation responses. Natural England notes that evidence submitted is similar to that which was previously submitted as part of the 'Call for Evidence'.</p> <p>Natural England acknowledges that these areas of land form part of the South London Downs National Nature Reserve. However, Natural England does not conclude this interest results in a tract of land which meets the Natural Beauty Criterion. In particular, Natural England considers that Kenley Aerodrome does not meet the natural beauty criterion given its land use and relatively flat topography which results in lower scenic qualities and condition. As a result, the areas of Dollyper's Hill and Kenley Common are physically fragmented from the areas of qualifying land associated with Happy</p>

Boundary		
Theme	Representations	Natural England Commentary
	<ul style="list-style-type: none"> <li>Part of the South London Downs National Nature Reserve</li> <li>Outstanding open views</li> <li>Contiguous with proposed extension</li> <li>Woodland mitigates views out towards adjacent urban areas</li> <li>Coulsdon Common comprises veteran trees – oaks and beech</li> <li>Green corridor of woodland on steep slopes between Dollyper's Hill and Coulsdon Manor golf course</li> <li>Outstanding open views.</li> </ul> <p><b>Desirability:</b></p> <ul style="list-style-type: none"> <li>Further work of Capital Downs Living Landscape nature recovery strategy</li> <li>Further the implementation of the AllLondon Green Grid</li> <li>Will bring better connectivity and protection</li> <li>Education for children</li> <li>Starting point for those visiting Happy Valley</li> <li>Ensures ongoing protection to habitats</li> <li>South London Downs National Nature Reserve designation shares all the factors relating to natural beauty – to designate only part of the National Nature Reserve as AONB creates a split in administration and complicates decision making</li> <li>These are 'threshold landscapes' – preludes to the AONB.</li> </ul> <p><b>Boundary:</b></p>	<p>Valley. Coulsdon Common is regarded as having a high natural beauty, given its concentration of veteran trees and intact wooded character; however, it is relatively small in extent, adjacent to urban areas and bisected by the B2030.</p> <p>Natural England does not agree with respondent <b>ANON-VUXE-WSKR-F</b> that the eastern boundary of Happy Valley does not have a distinct boundary. As noted above Natural England has reviewed the eastern boundary to ensure it more consistently aligns with the break in slope of the valley. These refinements place the boundary further to the west, again leaving Coulsdon Common, and other areas further east, isolated from the wider tract of qualifying land.</p> <p>On balance therefore, Natural England does not consider these areas of land to meet the Natural Beauty Criterion overall and, although Natural England acknowledges that these areas of land have qualities which are highly valued by local residents, it regards higher quality areas to be fragmented.</p> <p><b>Conclusion</b>  Minor deletion to ensure boundary is more consistently aligned with the break in slope of the valley, west of Coulston Common.</p> <p>(Deletion 5 – Refer to Figure 21b)</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p>A variety of boundary options were implied based on whether respondents wished to see just Coulsdon Common included or a wider area extending to Kenley Aerodrome and Kenley Common, or wider still to include Dollypers Hill.</p> <p><b>ANON-VUXE-WSKR-F (London Borough of Croydon)</b>, noted that the eastern boundary of Happy Valley does not have a distinct boundary so it would easily flow into these additional candidate areas.</p> <p><b>ANON-PQ5Q-KRRY-F (London Borough of Croydon)</b>  <i>'We request that further consideration is given to the additional area of search known as block EA8b within Croydon, namely; Coulsdon Common, Kenley Common and Riddlesdown (Site of Special Scientific Interest including the area to the east of the Riddlesdown SSSI) as this is owned by Croydon (namely Sanderstead to Whyteleafe Countryside Area (SWCA) which all form part of the South London National Nature Reserve. This area will lend itself to a further extension as the eastern boundary of Happy Valley does not have a distinct boundary so it would easily flow into these additional candidate areas and would create a contiguous area with Coulsdon Common as an area of open countryside. It is however noted that the two open spaces are separated by Coulsdon Rd.'</i></p> <p><i>'With regards to the area that we refer to as Riddlesdown the following clarification should be</i></p>	<p><u>Commentary</u></p> <p>Natural England welcomes the clarification regarding the area referred to as Riddlesdown.</p> <p>Natural England has again reviewed the evidence submitted and its decision to exclude land further to the east which forms part of the National Nature Reserve, including Coulsdon Common, Kenley Common and Riddlesdown. As noted above, Natural England considers these areas to be fragmented by road infrastructure and development, and that they do not form an extensive area which expresses sufficient natural beauty to be included within an AONB Designation.</p> <p>The ownership of the land is not a relevant consideration when assessing natural beauty. The inclusion of this land within the South London National Nature Reserve is only relevant in so far as the natural heritage interest in these landscapes contributes to an appreciation of natural beauty. Taking all factors into account, the Natural Beauty Assessment concluded that these areas either do not have sufficient natural beauty to warrant designation as an AONB or are physically fragmented.</p> <p>Natural England considers that the definition of the eastern boundary of the Happy Valley, is robust and sufficiently distinct.</p> <p><u>Conclusion</u> No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>noted regarding the names of the open spaces in the block of EA8b which lie to the east of the A22/Godstone Rd:</i></p> <p><i>a) 'Riddlesdown Common' is the area to the northwest of this block, which is the SSSI and is owned by the City of London. This also lies within the South London Downs NNR.</i></p> <p><i>b) 'The Sanderstead to Whyteleafe Countryside Area' (SWCA) is the area further to the east, and includes Ainsley Berry Shaw, and Dipsley's Shaw (owned by Croydon, and also lying within the NNR) running down to Warlingham Court Farm and the Whyteleafe Recreation Ground (owned by Tandridge, and outside of the NNR). This whole area is looked after by the SWCA.</i></p> <p><i>Some people refer to this whole area (a and b) as 'Riddlesdown' whereas some only see this as referring to the City of London area (a).</i></p> <p><i>The Council also note and support the recent publication of the Surrey AONB Officer response to the AONB consultation where they support (area 10 in their response) the extension of the AONB into the area referred [referred] to above.'</i></p>	

Boundary		
Theme	Representations	Natural England Commentary
Object to proposed Deletion 5 and wish to comment on the boundary to include more land	<p>Of the 37 responses received for this area, those that provided a reason for their view objected to Deletion 5, and commented on the boundary:</p> <p><b>ANON-PQ5Q-KRRY-F (London Borough of Croydon)</b>  <i>'The deleted area D5 : Land west of Coulsdon Common is not considered to be a minor deletion. It's inclusion in the AONB is justified to ensure the AONB boundary is more consistently aligned with the break in slope of the valley, west of Coulsdon Common. The open area which has landscape value that the deleted area covers extends to the east . This should not be deleted as it forms an important buffer zone to the SSSI which should override the landscape considerations.'</i></p> <p><b>ANON-PQ5Q-KRN2-4</b>  <i>'The landscape and the views from the area designated as D5 are integral to the landscape of the North Downs. It is not just about chalk valleys, the 'flat top' is just as much a component of the landscape and should be recognised as such. This is both from a visual point of view and to maintain what is left [of] the historic landscape. The area is clearly part of the Happy Valley / Farthing Downs landscape, from a human visitor point of view and from a biodiversity point of view. To draw arbitrary lines across a landscape area based on a perception of the 'edge of a valley', is just one persons ethereal interpretation, its not substantive and establishes ambiguity. To be viable, a</i></p>	<p><u>Commentary</u></p> <p>The assessment of land for AONB designation follows Natural England Guidance, which outlines the factors contributing to natural beauty and the process for determining boundaries. The reasons for Deletion 5 are set out in detail on page 19 above and, in particular, to ensure the boundary is more consistently aligned with the break in slope of the valley, given that the dramatic topography and patterns of land use make a strong contribution to the natural beauty of the area.</p> <p>The buffering of nature conservation designations is not a relevant consideration in the evaluation of land for designation.</p> <p>The area proposed for exclusion comprises relatively flat land that currently accommodates playing fields and recreational grounds associated with adjacent urban areas. Due to substantial vegetation cover in this area, views into Happy Valley are limited.</p> <p>The proposed boundary aligns with the SSSI boundary, and Natural England is confident this is a robust approach in this location.</p> <p>Natural England Guidance explicitly states that "land should not be included merely to protect it from specific development proposals" (Appendix 4). As such, the proposed boundary is not designed to protect land from specific development threats but, rather, reflects a considered assessment of the landscape's natural beauty.</p> <p>Natural England supports Nature Recovery Strategies and the connectivity between habitats. These initiatives may operate inside and outside of AONB's and are not a factor which determines the extent of land which qualifies for designation. Although only part of the area is proposed for designation, this will not prevent the movement of species and habitat connections between areas. Similarly, the designation of one area does not prevent the AONB Partnership from working beyond its boundaries to achieve nature recovery.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>boundary needs to be physically identifiable on the ground and be practical.'</i></p> <p><b>ANON-PQ5Q-KRZQ-F</b></p> <p><i>'We are fortunate to live adjacent to a piece of land that embodies the very essence of natural beauty and tranquility. This landscape, it is a vital ecosystem teeming with wildlife and a sanctuary for both nature and community well-being.</i></p> <p><i>Every dawn brings the soft rustle of rabbits emerging from their burrows, the graceful stride of deer grazing at the edge of the field, and the subtle tracks of badgers weaving through the underbrush. These creatures are not merely inhabitants of the land; they are integral threads in the rich tapestry of biodiversity that this area supports. Their presence is a testament to the unspoiled nature of the environment—a rarity that deserves our utmost protection.</i></p> <p><i>The potential exclusion of this land from the Area of Outstanding Natural Beauty (AONB) designation poses a significant threat. Removing this status opens the door to development that could irreversibly alter the landscape. Construction and urbanization would not only disrupt the habitats of the wildlife but also dismantle the peaceful refuge that residents and visitors alike cherish.</i></p> <p><i>Moreover, this land serves as a natural retreat—a place where people can reconnect with nature, find solace in the quiet rustling of leaves, and experience the simple joy of watching wildlife in its</i></p>	<p>Natural England also acknowledges the value of this land for local communities to connect with nature. The definition of an AONB boundary does not prevent people from freely exploring land within and beyond a designated area.</p> <p><b><u>Conclusion</u></b> No change.</p>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>natural habitat. In an increasingly fast-paced world, such spaces are indispensable for mental health and community cohesion.</i></p> <p><i>Protecting this land is not just about preserving a view; it's about safeguarding a living, breathing ecosystem and maintaining the natural heritage for future generations. We urge the decision-makers to recognize the irreplaceable value of this landscape and keep it within the AONB. Let us commit to preserving the tranquility, beauty, and biodiversity that make this place so special.'</i></p>	
<p><b>Include Riddlesdown Common, Ansley Berry Shaw and Warlingham Court Farm</b></p>	<p><b>ANON-VUXE-WEKR-F (London Borough of Croydon), ANON-VUXE-WEU9-J, ANON-VUXE-WEEN-Q, ANON-VUXE-WEGG-J, ANON-VUXE-WMG3-6</b></p> <p>Reasons given included:</p> <p><b>Natural Beauty:</b></p> <ul style="list-style-type: none"> <li>• Riddlesdown Common has a wild quality – scrub and calcareous grassland</li> <li>• Panoramic views</li> <li>• Visual connections to Kenley Common</li> <li>• Scientific and natural interest</li> <li>• Part of the South London Downs National Nature Reserve including Riddelsdown Common, Sanderstead to Whyteleafe Countryside Area and Dipsley's Shaw</li> <li>• Riddlesdown is a SSSI.</li> </ul> <p><b>Desirability:</b></p>	<p><b>Commentary</b></p> <p>Natural England considered this area as part of EA8b in the Natural Beauty Assessment Report.</p> <p>It concluded on pages 117 that '<i>The fragments of semi natural greenspace where there is wood pasture and chalk grassland are highly valued in the context of South London. However, these landscapes comprise relatively small pockets, fragmented by an urban context and physically separated from the wider AONB by Caterham and Chaldon. On balance these landscapes are not considered, either individually or collectively, to form land which meets the natural beauty criterion and they have therefore not been included within the Candidate Area.</i>'</p> <p>Natural England has reviewed this area in light of the consultation responses. Natural England notes that evidence submitted is similar to that which was previously submitted as part of the 'Call for Evidence'. Natural England also notes that the dramatic downland slopes of Riddlesdown and south of Warlingham Court form an important setting to adjacent urban areas and form important areas of open natural greenspace for local communities, valued for their calcareous grassland habitat. Nevertheless, for the same reasons given above, Natural England is of the view that these areas of land</p>



Boundary		
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	<ul style="list-style-type: none"> <li>Wash over the A22 and include Riddlesdown Common despite the fact it is physically separate</li> <li>Inclusion would assist partnership working</li> <li>Managing nature – bigger, better connected and better protected.</li> </ul>	<p>form fragmented parcels which, whilst expressing some qualities, overall do not form part of the wider tract of qualifying land.</p> <p>Natural England does not consider it appropriate to apply wash over in these circumstances. The areas which would require wash over to join Riddlesdown Common to the wider tract of qualifying land would be much greater than just the A22.</p> <p>Natural England is of the view that the AONB would be able to undertake collaborative work beyond its current or future boundary and to support initiatives to deliver nature recovery.</p> <p>For these reasons Natural England remains of the view that they should be excluded from the proposed boundary extensions.</p> <p><b>Conclusion</b> No change.</p>
Exclude land between existing AONB and Happy Valley	<p><b>ANON-PQ5Q-KR3P-7</b> <i>'Detailed field survey work and assessment of natural beauty concludes that one the more distinctive landscape of Happy Valley and Farthing are excluded from the assessment, the rolling farmland in isolation does not have sufficient beauty to be designated as a nationally important landscape.'</i></p> <p>A detailed natural beauty assessment was presented by this respondent. The conclusions stated:</p>	<p><b>Commentary</b></p> <p>Natural England acknowledges that respondent <b>ANON-PQ5Q-KR3P-7</b> agrees Farthing Downs and Happy Valley meet the Natural Beauty Criterion.</p> <p>Natural England understands respondent <b>ANON-PQ5Q-KR3P-7</b> has reached the following conclusions regarding the rolling farmland between the existing AONB and Farthing Downs/Happy Valley:</p> <ul style="list-style-type: none"> <li><u>Vast majority</u> of rolling farmland within estate has been incorrectly included.</li> <li><u>In isolation</u>, (i.e. without considering Farthing Downs and Happy Valley) it does not meet the natural beauty test.</li> <li><u>In combination</u> with transitional arable fields to the south (i.e. within the existing AONB) it does <u>not</u> meet the test for wash-over as it is <u>peripheral</u> and, therefore, <u>not part of a sweep of qualifying land</u>, such that wash-over cannot apply.</li> <li><u>Arable farmland is the predominant landscape type.</u></li> </ul>

Boundary		
Theme	Representations	Natural England Commentary
	<p><i>'Based on the above, this review has reached the conclusion that the vast majority of the rolling farmland within the Estate (hatched on figure 3) has been incorrectly included within the proposed AONB expansion area. In isolation, it does not meet the test of sufficient beauty to be designated as a nationally important landscape. Further, in combination with the transitional arable fields to the south of this expansion area, the inclusion of large tracks of similarly attractive but commonplace intensively farmed fields does not meet the test of appropriate wash-over, because being peripheral it will not sit within a sweep of qualifying land. Indeed, the arable farmland will comprise the predominate landscape type.'</i></p> <p><i>While it is accepted that Farthing Downs and Happy Valley do meet the natural beauty criterion, this is a relatively thin sliver of isolated land that is not contiguous with the existing AONB boundary. These are already afforded a high level of protection (SM and SSSI) and therefore it is not considered necessary to designate large tracks of non-compliant farmland to create a connected expansion area. This does not accord with the NE guidance and potentially erodes the wider AONB designation in this part of the Surrey Downs.'</i></p>	<p>Natural England has reviewed the detailed natural beauty assessment in Table 1 of the respondent's submission and notes that Table 1 refers specifically to land within the Estate in isolation (para 5.3). The assessment therefore appears to include a review of land which is already designated as AONB, as well as land within the extension area. Natural England reiterates that the Surrey Hills Boundary Review does not include an assessment of land which is currently designated as AONB (refer to Appendix 1 page 19-23). As a result, the assessment submitted by respondent <b>ANON-PQ5Q-KR3P-7</b> makes reference to features which are not relevant to the proposed extension area – for example, reference to the A23 which lies further to the west and masts which lie further to the east. In addition, Natural England notes that Table 1 makes reference to features and characteristics associated with Farthing Downs and Happy Valley (e.g. natural heritage features) which lie beyond the Estate landscape, contrary to paragraph 5.3 of <b>ANON-PQ5Q-KR3P-7's</b> response.</p> <p>Despite this, Natural England notes that the respondent's analysis reiterates many of the positive qualities highlighted in the Natural Beauty Assessment including topography being a particular feature, scenic compositions derived from the combination of woodland, hedgerows, topography and arable fields; landmarks including Netherne Water Tower and Chaldon Church, scattered ancient woodland and various listed buildings associated with Chaldon Church.</p> <p>Nevertheless, it concludes that the <i>'arable farmland does not meet the natural beauty criterion'</i>.</p> <p>The Natural Beauty Assessment for EA8a raised two important issues:</p> <ol style="list-style-type: none"> <li>1. <i>'The rolling farmed and partially wooded countryside that fringes Farthing Down to the west is transitional and is more strongly influenced by the wider urban context and urban fringe equestrian land uses and will require particular scrutiny at the boundary setting stage.'</i></li> <li>2. <i>'Furthermore, in the south, where flatter topography is intensively farmed, natural beauty is also transitional. This raises issues regarding the physical connection of the qualifying area of Happy Valley with the wider AONB, and will also need to be given particular scrutiny at the boundary setting stage.'</i></li> </ol>

Boundary		
Theme	Representations	Natural England Commentary
		<p>It went on to state:</p> <p><i>'There is also a transition in landscape condition and scenic quality to the southwest of Happy Valley, between the existing AONB and the qualifying land to the north. This will need to be given careful consideration when drawing a boundary and ensuring a suitable connection with the existing AONB.'</i></p> <p>The Boundary Considerations Report (page 34) provided further analysis stating that:</p> <p><i>'During the natural beauty assessment, concerns were raised regarding the <u>transitional nature of the landscape to the south of this extension area where it abuts the AONB</u>. The areas of <u>ancient woodland, steep undulating slopes along Dean Lane and north of Furzefield Wood</u> and extending into Happy Valley, were <u>considered to meet the natural beauty criterion</u>. However, to the <u>south between Lord's Wood, Court Farm and Rook Lane, a less undulating and intensive arable landscape, with evidence of boundary loss and caravan development within Furzefield Wood, was considered to be of lower landscape quality</u>. In the context of the wider extension area, these lower quality areas fall between qualifying land within the AONB to the south and the Happy Valley to the north. They were considered to be localised. On balance, these areas were regarded as sufficiently small in extent, that they could be considered part of the wider tract of qualifying land.'</i></p> <p>The Boundary Considerations Report states at para 2.2.1 that evidence collated during the Natural Beauty Assessment is re-considered, and further deskwork and fieldwork undertaken during the boundary assessment stage, and especially in areas requiring particular scrutiny. Natural England does not agree with respondent <b>ANON-PQ5Q-KR3P-7</b> that reference to qualifying land including <i>'steep undulating slopes along Dean Lane and north of Firzefield [Furzefield] Wood and extending into Happy valley'</i> is erroneous. This conclusion is reached following re-assessment of evidence and is also evident in the Natural Beauty Assessment tables which include the following relevant and consistent statements:</p> <ul style="list-style-type: none"> <li><i>'Between Netherne and Happy Valley, the enclosure pattern remains more intact despite intensive arable land use and here the pattern of wooded shaws and copses emphasises the classic rolling chalk landform.'</i></li> </ul>

Boundary		
Theme	Representations	Natural England Commentary
		<ul style="list-style-type: none"> <li>• <i>'The scenic qualities of this chalkland landscape stem from its rounded landform, which is emphasised by wooded shaws. The interconnected patterns of woodland and open chalk grassland, or arable farmland in the west, create scenic compositions and the sinuous form of the dry valleys create a sequence of attractive unfolding views.'</i></li> <li>• <i>'To the north the topography is more pronounced, forming undulating farmland, woodland copses and shaws which emphasise the landform and create flowing lines that lead the eye. The church at Chaldon is a local landmark which, along with the former water tower of the Netherne Asylum [Netherne Water Tower], adds to the scenic composition.'</i></li> <li>• <i>'From the edge of the higher land (e.g. around Chaldon Church) there are elevated vistas northward towards areas of open agricultural land with woodland shaws and patches of urban development in the distance. The distinctive rolling chalk topography of the dry valley system can be readily appreciated in these views. Chaldon Church overlooks this area, providing memorable views and acting as a local landmark.'</i></li> <li>• <i>'The scale of Happy Valley, and the attractive rolling countryside which forms its landscape context to the west, means that it is possible to explore this area, experience a sense of nature and of 'getting away from it all' and enjoy bird song and skylarks in summer.'</i></li> <li>• <i>'The woodlands and shaws throughout this landscape provide structure while areas of open chalk grassland or arable land express the rolling topography and underlying geology, all of which contribute to the scenic qualities of the area.'</i></li> <li>• <i>'There is a history of chalk quarrying in this landscape and former chalk pits are evident as small clumps of trees within arable fields to the west and north of St Peter and St Paul's Church, Chaldon.'</i></li> </ul> <p>All of these statements serve to illustrate the landscape qualities of the area north of Furze Field Wood which were noted in the Natural Beauty Assessment.</p> <p>Natural England notes that respondent <b>ANON-PQ5Q-KR3P-7</b> makes reference to plate 5 in para 6.1 to demonstrate the landscape is characterised as relatively flat, however</p>

Boundary		
Theme	Representations	Natural England Commentary
		<p>this view is of land south of Dean Lane, within the existing AONB and not of the land referred to in the Boundary Considerations Report.</p> <p>Natural England does not agree that the <i>'majority of the arable farmland within the Estate and proposed within EA8a is of lower quality and non-qualifying'</i> for the reasons detailed in the Natural Beauty and Boundary Considerations Reports.</p> <p>Natural England agrees that flatter arable farmland, Lords Wood, and land either side of Rook Lane, is of lower quality but remains of the view that these areas are limited in extent and fall within a tract of qualifying land between the existing AONB and land north of Furze field Wood. Natural England Guidance para 5.3 bullet points 5 and 6 state that <i>'There is no requirement that every parcel of land must meet either or both of the criteria (ie there may be, and is very likely to be, small areas of land which meet neither and 'the decision to include land that does not itself meet the technical criteria depends on the location, scale and effect of that land. Particular care is required however at the margins of a designation. Within the main body of a National Park or AONB there is likely to be greater scope for the inclusion of more sizeable areas of land which do not themselves meet the technical criteria.'</i></p> <p>Natural England does not agree that Happy Valley and Farthing Downs are already afforded a high level of protection and therefore it is not necessary to designate large tracts of non-compliant farmland to create a connected expansion. Firstly, the area of lesser quality land is limited in extent relative to qualifying land and, secondly, the Desirability Assessment Report (page 42) sets out the additional benefit of managing Happy Valley and Farthing Downs, with its scenic qualities in mind.</p> <p>Natural England also does not agree that the proposed extension area (including a small area of lesser quality land) is contrary to Natural England Guidance and erodes the wider AONB designation.</p> <p>Having reviewed the evidence submitted by respondent <b>ANON-PQ5Q-KR3P-7</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>

Boundary		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
		<a href="#"><u>Conclusion</u></a> No change.