Appendix 14: Woldingham Valleys

Please refer to Figure 22b

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

Overview

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

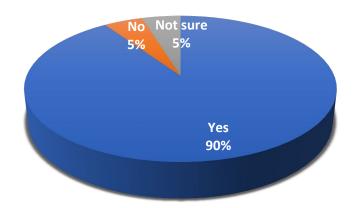
Natural Beauty	Responses
Yes	38
No	2
Not sure	2

Of the 42 respondents who answered question C1, 38 respondents (90%) felt that the Woldingham Valleys Extension Area has sufficient natural beauty to be designated as AONB.

Just 2 of the respondents (5%) felt that the Woldingham Valleys Extension Area does not have sufficient natural beauty to be designated as AONB.

Desirability reasons for including and excluding land within the proposed extension focused on current planning legislation, future of the AGLV, as well as opportunities to join up protected areas and enrich wildlife. These issues are addressed in Appendix 2

Woldingham Valleys - Sufficient natural beauty to be designated



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

Boundary	Responses
Yes	11
Yes, but I wish to suggest an alternative	25
No	2
Not sure	1

Of the 39 respondents who answered question C5, 11 respondents (28%) agreed with the proposed boundary for the Woldingham Valleys Extension Area and 2 respondents (5%) did not. 25 respondents (64%) agreed but wished to suggest an alternative boundary, many providing supporting evidence.

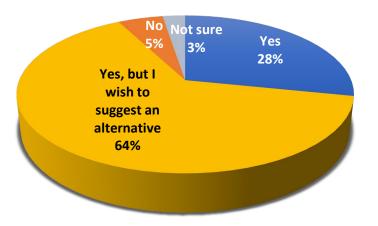
The additional areas of land that respondents wish to see included within the proposed extension are:

- Beddlestead Valley and Tatsfield Slopes
- Land to the north including Chelsham and Farleigh
- Land at the western end of Hallalloo Valley between the railway and A22
- Small parcel of land west of A22 on the edge of Caterham

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

Whole of the Extension Area

Woldingham Valleys - Agreement with the proposed boundary



During the second (2024) statutory consultation, responses were received regarding **Addition 10: Western edge of Halliloo Valley**, where the majority of respondents were seeking the inclusion of more land, extending into Chelsham and Farleigh in particular. Natural England has reviewed these responses and provided further commentary in blue below.

Natural Beauty		
<u>Theme</u>	Representations	Natural England Commentary
The proposed extension meets the Natural Beauty Criterion	Many respondents agreed that the proposed extension met the natural beauty criterion. ANON-VUXE-WE1K-Z 'Yes, all the area in the new extension are very much welcome.'	Commentary 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.
	ANON-VUXE-WEVE-Y [Anon] and [Anon] support the conclusion that the area labelled Woldingham Valleys shown on Figure 22 of the Boundary Considerations Report should be designated as AONBWe agree that the Woldingham Valleys area exhibits natural beauty that is distinctive and characteristic of the underlying chalk geology of the Surrey Hills and are delighted that Woldingham Valleys and the village of Woldingham has been included in the extended AONB.	
	ANON-VUXE-WEC9-Z 'I believe these areas are beautiful examples of quintessential English countryside and should be protected from development or change. These areas provide an immeasurable benefit to the surrounding areas and are completely irreplaceable.'	
	ANON-VUXE-WMYX-W 'We fully support the extension of the AONB as this would help to protect the area from unsuitable development and maintain its natural beauty.'	
	ANON-VUXE-WEPN-2 'Striking and distinctive scenery which reveals the geology and geomorphology of the area, provides relative	

Natural Bea	Natural Beauty		
Theme	Representations	Natural England Commentary	
	tranquillity and contributes to the story of the Wandle Valley and its upper catchment of chalk landscapes and dry valleys.'		
The proposed extension does not meet the Natural Beauty Criterion	ANON-VUXE-W5T8-Z considered the area did not meet the Natural Beauty Criterion. No justification was given. ANON-VUXE-WECV-W 'Unfortunately, there has been a number of unauthorised buildings which are the subject of various planning enforcements which do not seem to have any realistic prospect of success in removing the various mobile homes and field shelters etc. which are not in keeping with the rural setting.	Commentary 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. Detailed issues raised by respondent ANON-VUXE-WECV-W are addressed in relation to the exclusion of the whole Extension Area which can be found below. Natural England notes concerns regarding increased bureaucracy and planning issues and these are addressed in detail in Appendix 2.	
	In addition, there are a number of mobile phone masts and other telecommunications equipment such as an Airwave tower in the area which detract from the natural environment.		
	Also there are an increasing number of business jet flights landing at Biggin Hill Airport which given the proximity of the airfield are flying low over the valleys with landing gear down on final approach.		
	The designationwould result in an additional layer of bureaucracy and more issues with planning etc which would be at odds with the failure of the current system to control these unauthorised buildings.'		

Boundary	Boundary	
Theme	Representation	Natural England Commentary
General agreement with proposed boundary	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: ANON-VUXE-WSQJ-D 'I feel that much of this landscape should have been designated within the AONB from the very beginning. This proposal is welcome and long overdue.' ANON-VUXE-WERP-6 'I think this takes in all the countryside left in the area which needs protecting from the encroachment of London.'	Commentary 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.
Requests for Ad	ditional Areas	
Include parcel of land west of A22 on edge of Caterham	 ANON-VUXE-WENG-S made the case that this land should be included in the AONB on the basis that: The field includes an area of rare chalk grassland and is bordered by a mature wooded strip on its eastern boundary together with smaller wooded areas in the NW and SW corners. There are wonderful views of this rising land from various locations in both Caterham Valley and Caterham on the Hill, notably Godstone Road, Tupwood Lane, Church Hill and adjoining roads, and the cemetery at St Mary's Church. Looks particularly beautiful when bathed in the golden light of the setting sun and 	Commentary This area forms a relatively small parcel of land which is severed from the wider AONB by the A22. This area of land was not considered as part of a wider Evaluation Area, nor was it identified as a boundary anomaly during the 'call for evidence'. Historically this area of land has not been recognised as AGLV. Natural England has reviewed this area and recognises that it forms an area of steep open chalk pasture immediately adjacent to residents of Caterham. However, it is an isolated area of land which is not visually or physically linked to the wider AONB. Given its position and relatively small-scale, Natural England does not consider that it is appropriate to include this land within the proposed boundary extension.

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
	dramatic when rainbows are seen in their entirety in the field against the darkened sky. This one field enhances and visually connects the AONB, making it less remote from the people who live closest to it. A22 is not visible due to woodland and land forms part of a continuous sweep up to the urban edge Natural beauty is evident close up or seen in longer distance views Area enhances physical and mental wellbeing Frequent visits from deer that live in the woodland to the north. Bats are seen swooping over the field and neighbouring gardens. There is also a variety of birdlife in and around the field including skylarks, owls, and pheasants. Land forms a backdrop to Caterham	Conclusion No change.
Extend boundary to include land between railway and A22 north of Birchwood House Farm	ANON-VUXE-WEZN-C and ANON-VUXE-WEV6-W made the case that this area should be included in the AONB, submitting identical representations. Evidence included: Natural Beauty Landscape character of both the existing and extended AONB extend seamlessly to the settlement edge of Warlingham – the	Commentary The Natural Beauty Assessment Report considered this area as part of EA9a. It noted on page 123 in relation to landscape quality that 'there is a transition to a lower quality landscape towards the western slopes of the valley, where the influence of the surrounding urban context (major roads, the railway and development, as well as equestrian uses) becomes increasingly dominant, detracting from the overall landscape quality.'
	landscape is not transitional Intervisibility between the existing/extended AONB	The area was not identified as falling within the proposed Candidate Area which extended as far as the railway.

Boundary		
Theme	Representation	Natural England Commentary
	 No masts to mar these memorable long distance views Completes the memorable landscape composition of the existing/extended AONB Area is not visually affected by surrounding urban context (major roads, the railway and development, as well as equestrian uses). Trees add interest and valuable habitats Only significant equestrian use in this area is located at Birchwood Farm, which is in the existing AONB, and not in EA 9a. Desirability Given the strong visual connection, it is highly desirable that planning policies be the same to ensure that the natural beauty of the northwest area of the Woldingham Valleys, the Woldingham Valleys, and the existing AONB is retained for future generations. Designation of the northwest area of the Woldingham Valleys will place a duty on decision makers to conserve and enhance the special qualities of the area where development and land use change is proposed. Boundary The proposed boundary is neither durable or defensible because it relies upon hedgerows and tracks that can be removed at any time. 	At the boundary definition stage the issues associated with defining a boundary in the western part of the Halliloo Valley was given particular attention due to 'the transitional nature of the valley and influence of equestrian uses and fragmentation as a result of roads and railway' It notes that 'a boundary was drawn within the transition including the higher quality areas.' Natural England has reviewed this area and acknowledges that areas of equestrian use are already partially within the existing AONB and that development in Warlingham and Caterham does not significantly impact on this triangle of land. The proposed boundary has been arrived at due to a need to address the transitional qualities of land west of the railway and to addressed boundary anomalies within the existing AONB boundary. Factors which contribute to the transitional nature of the lands include kennels associated with Birchwood Farm which create visual clutter, equestrian land use and noise intrusion from the junction with the A22 on the edge of Caterham. The boundary was drawn within this transition by taking it along the railway and then connecting to the existing AONB boundary. To address the boundary anomalies in the existing AONB boundary, the proposed boundary was extended to the first available boundary to the north which is a hedgerow. Natural England Guidance states that the boundary should follow easily distinguishable permanent physical boundary features. The boundaries of National Landscape Designations often follow hedgerows and Natural England considers this to be an acceptable boundary feature. However, Natural England considers this to be an acceptable boundary feature. However, Natural England also acknowledges that having reached this position, it leaves a relatively small triangle of land to the north beyond the proposed boundary extension. Natural England has reviewed this situation. Whilst it does not consider the Halliloo valley west of the railway to be of the same quality as land to the east of the railway,

Boundary	Boundary		
<u>Theme</u>	Representation	Natural England Commentary	
	 The proposed railway line and road are more defensible and durable proposed boundary continues from the extension boundary north along the A22 Caterham bypass to Wapses Lodge roundabout, then follows Succomb's Hill to the railway where it then turns to follow the railway broadly southeast to re-join the consultation Woldingham Valleys boundary 	Conclusion Minor addition to include western edge of Hallaloo Valley. (Addition 10 – Refer to Fig 22a)	
Support for proposed Addition 10: Western edge of Halliloo	111 respondents agreed with the designation of Addition 10, some providing reasons for their views as follows:	Commentary Natural England acknowledges the reasons given by respondents in support for this addition.	
Valley	ANON-PQ5Q-KRHH-M (Tandridge District Council) 'Tandridge District Council supports the inclusion of area A10 as defined in Figures 12b and 22b of the Second Consultation Documents. We agree with the conclusions made by Natural England (Appendix 14: Woldingham Valleys Analysis Table) that the start of the distinctive and dramatic land form of the Halliloo Valley is clearly expressed as one exits the roundabout at Woldingham Road. We agree that the expanded AONB boundary should encompass the entirety of this Valley and so we wholeheartedly endorse this AONB boundary amendment'	2 respondents did not agree with the designation of Addition 10 but provided no reason for their view. Natural England notes there are no responses specifying a change to the boundary in this area. Conclusion No change.	
	ANON-PQ5Q-KRHW-3 'On behalf of [Anon], delighted that Natural England has included the Western edge of Halliloo Valley (Second Consultation Documents: Figures 12b and		

Boundary	Boundary	
<u>Theme</u>	Representation	Natural England Commentary
	22b) in the expanded Surrey Hills Area of Outstanding Natural Beauty/National Landscape.	
	As explained in Appendix 14, the whole of the Halliloo Valley demonstrates the distinctive chalk slopes and high quality landscapes which are characteristic of the Surrey Hills AONB/NL, and so we are very pleased that all of it is now being included within a more durable and long-lasting extended boundary. In conclusion, we very much support amendment A10 of the expanded AONB/NL boundary.'	
	ANON-PQ5Q-KR5C-V 'With the growth of busier urban areas, these areas are a special resource and should be protected for the sake of the flora and fauna and those who seek their restorative qualities.'	
	ANON-PQ5Q-KR9P-D 'Beautiful and largely unspoiled natural habitat, worthy of protection.'	
	ANON-PQ5Q-KRAV-U 'This is an area with a beautiful view of the valley and should be added to the AONB.'	
	ANON-PQ5Q-KRJT-2 'It seems logical to include this final attractive part of the Halliloo Valley up to boundaries formed by the A22 and the railway line.'	

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
	ANON-PQ5Q-KRKM-V 'A beautiful valley of which the whole area should be included in the AONB'	
	ANON-PQ5Q-KRSB-S and ANON-PQ5Q-KRSJ-1 'Protection against the erosion of the green spaces in this area are essential to preserve them for future generations.'	
	ANON-PQ5Q-KRV9-K 'A beautiful area to walk. An area with ancient history'	
	ANON-PQ5Q-KRX7-K 'To preserve the integrity of the whole valley.'	
	ANON-PQ5Q-KRXF-2 'Essential to protect out [our] environment by extending protection to areas of natural beauty.'	
Extend boundary to include Beddlestead Valley and Tatsfield	A number of respondents requested inclusion of the Beddlestead Valley including ANON-VUXE-W5UR-U (Surrey County Council), ANON-VUXE-WE7P-B (Tandridge District Council), ANON-VUXE-WEVE-Y, ANON-VUXE-WSIS-P, ANON-VUXE-WEWD-Y and ANON-VUXE-W5BW-D.	Commentary The Natural Beauty Assessment considered the Beddlestead Valley as part of EA9b and recorded the findings on pages 127-132 of the Natural Beauty Assessment Report.
Slopes	Whilst they agreed with positive comments about the area, set out in the Natural Beauty Assessment,	The assessment recorded the positive qualities of the Beddlestead Valley including the high scenic quality within the steep sides and winding valley system, varied sequence of views, which shift with the curves of the landform, along with combined intimacy and sense of spaciousness. It noted that from within the valleys there were locations

Boundary		
Theme	Representation	Natural England Commentary
	they disagreed with the conclusions to exclude the area for the following reasons: Natural Beauty Area exhibits the distinctive attributes of the underlying chalk geology Settlements of Tatsfield and Biggin Hill are hardly visible on the distant horizon, and so have almost no influence on the landscape quality - impact of the settlements of Tatsfield, Biggin Hill and infrastructure on this area has been over-stated in the Natural Beauty Assessment Report Gas distribution site to the east of Pitchers Wood - entrance has no more than a very localised impact on the landscape No mast at Botley Hill and mast referred to on Titsey Hill is within the existing AONB Quality does not decline where topography is elevated and flattens and presence of man-made features here does not detract from the outstanding scenic qualities of the distinct undulating chalk landscape Busyness of B269 is localised relative to large area of Beddlestead valley unaffected by traffic Impact of incongruous features and roads has been over-stated Localised impact of incongruous features should not outweigh the conclusion that overall the area has sufficient natural beauty to be designated AONB	where development on the fringes of the area intruded but that frequently the downland valley landscape scenery predominates. It also noted that scenic qualities decrease where topography is elevated and flattens and where modern farm infrastructure, roadside buildings and masts punctate views. It concluded that 'outside of the Beddlestead Valley, the landscape lacks the drama and compositional interest found in the core of the area.' It also noted that on the fringes of Tatsfield urban fringe land uses reduce the quality of the landscape and that lane erosion from traffic and flytipping/litter has a degrading influence on quality and condition. In the overall assessment of weight and spatial distribution of natural beauty evidence it highlighted the mixed weight of evidence and that where natural beauty is met it comprised a relatively narrow small area in the centre of the Beddlestead Valley. It went on to describe the declining natural beauty on the fringes of the area due to busy roads, incongruous features and urban fringes of Tatsfield. It concluded 'On balance, the central area of the Beddlestead Valley, where there is some evidence of natural beauty, is not considered sufficiently extensive and is fragmented from the wider AONB and separated by land which is not considered to meet the natural beauty criterion. On this basis the whole of the area has been excluded.' This decision has now been reviewed in light of the consultation responses. Given that the Natural Beauty Assessment concluded the Beddlestead Valley met the natural beauty criterion, detailed assessment was undertaken to define a boundary which captured the extent of qualifying land, and to test the conclusion that the qualifying area was small and narrow relative to surrounding areas of lesser quality landscape. The assessment found: High quality land sweeps in close to the urban edge of Tatsfield with often relatively abrupt changes between the qualifying areas and urban development.

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
	Inappropriate to set a higher standard for this area than for areas that are already within the existing AONB. Boundary Respondents suggested boundaries which followed the Roman Road and County boundary before heading west along Hesiers Road, Church Lane edge of woodland, Washpond Lane and then Ledgers Road to join with the proposed extension boundary at Worms Heath. None of the respondents proposed a boundary which extended beyond the Surrey County Boundary.	 From within the valley system the upper slopes and woodland define views and contribute to scenic composition. The intrusion of masts is not regarded as undermining the strong scale and drama of the landscape. Although the fringes of the area to the south and west were of lesser quality, they were relatively narrow in extent compared to the extensive branching qualities of the valley system. A boundary could be defined which brought in the qualifying valley system with minimal inclusion of lesser quality land. Given these findings Natural England is of the view that the Beddlestead valley meets the natural beauty criterion and that the Extension Area called Woldingham Valleys should be extended eastwards to also include the Beddlestead Valley and should extend as far as Norheads Lane and Lusted Hall Farm, including the visually important valley slopes which make a contribution to the scenic compositions experienced through the valley system and which are of themselves of high quality. The extent of the proposed boundary would result in a relatively small area of land (c. 1.26sq km) falling within the London Borough of Bromley. A small area of the Kent Downs AONB (878sq km) already lies within this local authority area and therefore the London Borough of Bromley already has experience of AONB and associated policy (Policy 76) within its current Local Plan (January 2019). Conclusion Major addition to include the Beddlestead Valley. (Addition 11 – Refer to Figure 22b)
Support for proposed Addition 11: Beddlestead Valley	111 respondents agreed with the designation of Addition 11, some providing reasons for their views as set out below. Some responses were particularly detailed and have been summarised.	Commentary

Boundary	Boundary		
Theme	Representation	Natural England Commentary	
	Examples include: ANON-PQ5Q-KRHH-M (Tandridge District Council) 'Tandridge District Council supports the inclusion of this area as defined in Figures 12b and 22b of the Second Consultation Documents. We agree with the conclusions made by Natural England (Appendix 14: Woldingham Valleys Analysis Table) that the views from within the steep sides of the winding valley system are of high quality themselves and the combination of spaciousness and intimacy is unique to this area. We agree that the dramatic topography and ever-changing scenic composition justify the inclusion of this area in the expanded AONB. We agree with Natural England's conclusion that the Beddlestead Valley meets the natural beauty criterion and 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.'	Natural England acknowledges the reasons given by respondents in support for this addition. 3 respondents did not agree with the designation of Addition 11 but provided no reason for their view. Conclusion No change.	
	ANON-PQ5Q-KRH8-4 (London Borough of Bromley) 'The proposed addition includes land within the London Borough of Bromley (LBB) boundary. Having considered the proposed boundary and the justification for this, LBB supports the proposed addition to include this land within the amended Surrey Hills National Landscape boundary. The consultation document recognises that part of LBB		

<u>heme</u>	Representation	Natural England Commentary
	already falls within the Kent Downs AONB/National Landscape, hence we are familiar with policy and guidance relating to AONBs/National Landscapes, and we do not envisage any practical difficulties relating to the designation of a further small part of LBB within the Surrey Hills National Landscape.'	
	ANON-PQ5Q-KRHW-3 'On behalf of [Anon], and [Anon] are both delighted that Natural England has included the Beddlestead Valley (Second Consultation Documents: Figures 12b and 22b) in the expanded Surrey Hills Area of Outstanding Natural Beauty/National Landscape.	
	We would like to thank Natural England (and their professional advisors) for revisiting the initial assessment in light of the consultation responses. We are very pleased that Natural England was able to draw the boundary shown in this second consultation which includes the areas which Natural England recognised in the first consultation met the natural beauty criterion.	
	We agree with the conclusions in Appendix 14 which highlight the dramatic topography of this winding valley system and the combination of intimacy and spaciousness which this area exhibits. We agree that all of these qualities support including the Beddlestead Valley in the expanded Surrey Hills Area of Outstanding Natural Beauty/National Landscape. In conclusion, we are delighted to support the Beddlestead Valley boundary amendment shown as A11.'	

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
	ANON-PQ5Q-KRKM-V 'An important area for wildlife which should be included in the AONB.'	
	ANON-PQ5Q-KR5C-V 'These pockets of natural environment are a precious resource, providing a respite from growing busy urban environments, and safe havens for plants and animals to flourish.'	
	ANON-PQ5Q-KR97-M 'This is a popular and attractive natural area for organised rambler groups as well as self guided ramblers. There are orchids and seasonal other wildflowers to be found.'	
	ANON-PQ5Q-KR83-F	
	Reasons given include:	
	 Exceptionally dramatic Plethora of wildlife Mix of woodland (including ancient) and farmland Area used for Duke of Edinburgh pursuits Relatively uninhabited Rare landscape within the M25 Botley Summit is one of the highest points on the North Downs. 	
	'I hope this conveys how special this area is so it can be considered a part of the AONB which will	

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
	help secure the area's ecological future and ensure it is preserved for generations to come.'	
	ANON-PQ5Q-KR8N-A	
	Reasons given include:	
	 Rich ecological, historical and environmental significance Amazing views Diverse fauna and wildlife inc. red kite and common buzzard Woodland shaws. 	
	'Designating the Beddlestead Valley would ensure the protection of this natural and historical asset for future generations. The recognition would bolster conservation efforts already under threat, preserving delicate habitats and maintain the wildlife that is being lost due to encroachment.'	
	ANON-PQ5Q-KRN2-4 'This is a beautiful chalkland valley, typical of the rolling chalk landscape of the North Downs and an example of a dry river valley. In landscape quality terms it far outshines many of the designated areas of the Surrey Hills.'	
	ANON-PQ5Q-KRTY-H 'The area surrounding Beddlestead lane, including its dramatic chalk valley geography, is an exceptional example of natural beauty and	

Boundary		
Theme	Representation	Natural England Commentary
	ecological richness. This landscape deserves to be part of the Area of Outstanding Natural Beauty due to its unique wildlife, striking scenery, and historical significance as a relatively untouched farming area.'	
	Reasons given include:	
	 abundance of wildlife, including wildlife not so often seen in the British countryside human population in this area is unusually sparse woodlands burst with snowdrops and bluebells in spring, creating a stunning transition to summer. Rarer flora and fungi are also seen, such as orchids and fields of poppies given their love of chalk. harmonious blend of woodland and farmland Woodland surrounding the valley extends its natural beauty far beyond the central chalk valley itself, making the case for including nearby areas in the AONB boundary, such as including Norheads and towards Tatsfield, a good decision. allow people to enjoy stargazing because of the lack of people/lighting, but within a location that people can access from the more urban areas. 	
	ANON-PQ5Q-KRXF-2 'Essential to protect our environment by extending protection to areas of natural beauty.'	

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
Support Addition 11 but wish to see more land included and an alternative boundary	Of the 111 responses received supporting Addition 11, 7 wished to comment on the boundary and a further 3 (who supported Addition 11) also provided a view on the boundary, wishing to see more land included to the north within Chelsham and Farleigh. A variety of areas/boundaries were suggested including:	Commentary A few respondents who requested the inclusion of more land, reiterated evidence previously submitted during the first consultation. Natural England notes that there is no consensus regarding an alternative boundary put forward by respondents. Each of the various boundary options put forward are discussed below.
	 Valley between Ledgers Farm and Chapel Hill Chelsham and Farleigh Parish (part) Chelsham and Farleigh Parish with Selsdon Wood and Hutchinson's Bank. Some responses were very detailed and have been summarised. ANON-PQ5Q-KR8V-J (Surrey County Council) 'We support the recommendation to include the Beddlestead Valley within the AONB. However, we consider there to be a desirability case for modifying the proposed boundary of the extension and that it should be amended as follows. In relation to the Chelsham and Farleigh parish areas which have been excluded from the proposed boundary extension, the consultation report notes that the narrow finger of land forming the north-south valley which extends between Ledgers Farm and Chapel Hill does meet the natural beauty criterion. But it goes on to say, 'Given these findings, consideration was given to the inclusion of 	Inclusion of valley between Ledgers Farm and Chapel Hill Natural England acknowledges that the narrow valley between Ledgers Farm and Chapel Hill has a weight of evidence supporting natural beauty. The qualities of the area, and the reasons why it has not been included within the proposed boundary extension, are set out on pages 33-35 below. Whilst the inclusion of land to the west (such as Great Farleigh Conservation Area), might prevent the valley from being physically 'isolated', Natural England considers that it will nonetheless remain a pocket of higher quality land within a wider tract of lesser quality landscape. Natural Beauty within the wider Chelsham and Farleigh Parish The Natural Beauty Assessment Report (pages 131 – 134) sets out the reasons why this area is not considered to meet the Natural Beauty Criterion. It concluded that 'The Farleigh area has a mixed weight of evidence of natural beauty. The extensive ancient woodlands, wooded shaws, historic commons, winding narrow lanes and historic settlements contribute to a historic landscape pattern with a high biodiversity value. However, the area's natural beauty is fragmented by residential development, by agricultural and equestrian infrastructure and by extensive golf courses. The rural character of the hedged narrow lanes that connect the settlements is eroded by heavy traffic.
		The weight of natural beauty evidence is higher in the enclosed ancient woodlands and narrow north-south aligned dry valleys which are not traversed by roads. This is a

Boundary		
Theme	Representation	Natural England Commentary
	qualifying area of the Beddlestead Valley would require the application of wash over to the south and east. Given the peripheral location of the valley, and that the extent of the qualifying area is small and	relatively enclosed and 'self-contained' landscape with limited inter-visibility to surrounding landscapes and is physically separate from the elevated chalk downland associated with the North Downs (and the Surrey Hills AONB) to the south.
	that an area of similar if not larger scale would need to be washed over for it to be included, Natural	Overall, while there are patches of higher quality landscape, this part of EA 9 is not considered to meet the natural beauty criterion, primarily as a result of fragmentation.'
	England concludes that on balance the area should not be included within the proposed extension to the AONB'.	Having reviewed the responses submitted during the second consultation, including new evidence relating to Great Farleigh Conservation Area, and its management by Surrey Wildlife Trust, Natural England remains of the view that the evidence submitted does not materially alter the judgements reached.
	Although we agree that the definition of a boundary to include this land is challenging, it is unfortunate that it is currently not proposed for inclusion, given its identified qualities.'	Natural England agrees with ANON-PQ5Q-KR8V-J that the land beyond the narrow valley between Ledgers Farm and Chapel Hill is mixed in terms of its qualities. ANON-PQ5Q-KR8V-J highlights aspects of greater value (e.g. St Leonard's Church, Chelsham Conservation Area, ancient woodland at Greatpark Wood) and areas which are considered borderline or lesser natural beauty (e.g. Farleigh Golf Course and
	Proposed Boundary	incongruous development along Chelsham Court Road). These issues reflect Natural England's observations made during the Natural Beauty Assessment.
	We would suggest the inclusion of a slightly larger area of land between Fairchildes Road in the east (to incorporate St. Leonard's Church, Chelsham and the Fickleshole Conservation Area), north to the boundary with Featherbed Lane (excluding the industrial site) and west to incorporate the eastern part of Farleigh Golf Course, which includes a narrow dry valley feature of considerable scenic quality. The western boundary could follow (and include) the ancient woodland at Greatpark Wood	The proposed boundary by ANON-PQ5Q-KR8V-J seeks to avoid areas of development, proposing only part of the Parish, in contrast to other respondents who wish to see the whole Parish or additional land, beyond the Parish, also included. Natural England has reviewed ANON-PQ5Q-KR8V-J's proposal but notes that it would still result in the inclusion of land which is considered to be of lesser quality, and this would not justify the washing over of land to the south and east to connect it to the Beddlestead Valley.
	and Holt Wood but exclude the development at Great Park. The southern boundary could run to the east of Ledgers Road and north of Washpond Lane,	ANON-PQ5Q-KR8V-J frame their request for a change to the boundary in the context of desirability, although no specific desirability reasons are cited, other than that the extension would link well to the Beddlestead Valley.
	washing over discrete incongruous development along Chelsham Court Road (see attached map for suggested addition boundary). Whilst we accept that there are borderline areas within this suggested	Natural England recognises that this area of countryside is highly valued, given its close proximity to London as well as its extent. However, for land to be designated, it must first meet the Natural Beauty Criterion. The desirability of including land based

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
	boundary with parts of greater and lesser natural beauty, we consider this (or a similar boundary)	on countryside close to London is not the basis on which judgements are reached and would not be in accordance with Natural England Guidance.
	would link well with the Beddlestead Valley to the south. Therefore, whilst we support Addition A11, we object to the revised boundary as currently proposed and recommend that it is reconsidered. Were Natural England to amend the boundary as	Overall, Natural England remains of the view that the area which qualifies in terms of its natural beauty north of Beddlestead Valley is the valley between Ledges Farm and Chapel Hill. Natural England consider this valley to form a narrow finger of land which is of small geographical extent. It is also separated from qualifying land by lesser quality landscape. Further north and west the landscape has a mixed quality and or lacks the distinction of the dry chalk valleys to the south.
	suggested above then we would have no objection.' ANON-PQ5Q-KRGA-C 'I am absolutely thrilled that Beddlestead Valley has been included as it is an historic and a stunning landscape.'	Any attempt to connect this valley landscape with qualifying land to the south would require wash over of non-qualifying land. The size of the area which could be brought into the AONB is relatively small when taken in the context of the larger extension area of the Beddlestead Valley to the south. Furthermore, Natural England considers that the valley between Ledgers Farm and Chapel Hill is not sufficiently surrounded by higher quality land. This reduces the desirability of applying wash-over in this area.
	'I believe there should be a reconsideration of the valley between Ledgers Farm and Chapel Hill.'	Future of the AGLV
	Reasons given include:	Issues relating to the future of the AGLV are addressed in Appendix 2, pages –20-21.
	 Once in a lifetime opportunity Area may be small but other boundary refinements are also small Purpose of the review is to include as much land as possible Countryside left out will come under 	Development and recreation pressures Issues relating to development and recreational pressure are set out in Appendix 2 pages 10-12 and 26 respectively.
	 development pressure Knock on impact on recreational use of AONB close to urban fringes. 'I also wish to express my disappointment of the 	Overall, Natural England considers the proposed boundary along Washpond Lane, Chelsham Court Road (excluding development to the south) and Hesiers Road, is the most robust.
	exclusion of the hamlet of Fickleshole, which could have easily been added to Beddlestead Valley along with Farleigh and Chelsham, particularly when this	Inclusion of Selsdon Wood

Boundary	Boundary		
Theme	Representation	Natural England Commentary	
	was supported by Surrey County Council, Tandridge District Council and the Surrey Hills Board.' ANON-PQ5Q-KRJG-N '[Anon] is very pleased to see that 'Beddlestead Valley' has been added to the proposed extension, which is also recognized by the Surrey Hills AGLV Review by Chris Burnett Associates 2007, Surrey Hills Board, Tandridge District Council, Surrey County Council and Chelsham and Farleigh Parish Council we do feel that there should be a reconsideration of the valley between Ledgers Farm and Chapel Hill to include the isolated church of St Leonard's and	Natural England agrees with respondent ANON-PQ5Q-KRHC-F that Selsdon Wood has many qualities. These qualities were recorded within the Natural Beauty Assessment Report pages 131-134 which concluded that 'the weight of natural beauty evidence is higher in the enclosed ancient woodlands.' However, it is separated from qualifying land to the south by an extensive area which Natural England considers does not meet the Natural Beauty Criterion as noted above. For these reasons, it has not been considered further for designation. Conclusion No change.	
	the small historic hamlet of Fickleshole'		
	 Poesn't matter there is a narrow finger of land If land qualifies it should be included Other minor boundary additions are made elsewhere Chris Burnett Associates also rated the Ledgers Farm area and Fickleshole area as having shared characteristics with the AONB. 		
	'We are disappointed that Farleigh and Chelsham were left out since these rural hamlets are remarkable landscapes being so close to London.'		
	Reasons given include:		

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
	 Farleigh and Chelsham AGLV is a huge area of AGLV land left out of AONB designation and up against London Area will lose AGLV status but is an important buffer to the AONB Development in this area will have knock on impact on recreation and traffic in the AONB Assessment work should include an update of local landscape policy to protect valued countryside Golf courses are carved into the landscape and retain remarkable sense of remoteness and historic parkland character Selsdon Golf Course is being put forward as one of London's largest re-wilding projects Selsdon Wood and Hutchinsons's Bank Nature Reserve have outstanding natural heritage. 	
	ANON-PQ5Q-KR3N-5 'Chelsham and Farleigh is AGLV and has the characteristic of Chalk Downs with Woodland countryside. My own experience of Farleigh is of a remote mosaic of ancient woodland and fields, connecting hedges and shaws, secluded dry chalk valleys, all in an area of real quality, preservation and landscape character near to London. With its proximity to the Greater London boundary, the wildlife available in these areas, scenic beauty	

Boundary	/	
<u>Theme</u>	Representation	Natural England Commentary
	residents both from Surrey and Croydon and it makes sense to me to use the Green Belt boundary as the demarcation for the ANOB extension.	
	Given that AGLV status will fall away at the end of this review, which is itself an extremely rare review, as a Surrey County representative I am concerned.	
	Tandridge noted that some 66% of its AGLV will not be included by Natural England in any AONB extension, and hence will lose this protected status, which has marked it out for decades as a possible candidate for AONB inclusion.	
	I feel this is a lost opportunity to enhance by inclusion a very worthwhile and characteristic landscape, that should now be grasped by making an addition of the remainder of Chelsham and Farleigh alongside Beddlestead, just as the Surrey Hills Board have recommended to you.'	
	ANON-PQ5Q-KR4M-5 'we support the recognition and extension of the AONB proposed for A11 Beddlestead Valley but wish to see the boundary extended further north and west to include the landscapes of Chelsham & Farleigh and Crewes Valley (in the Parish of Warlingham) in order to define a larger and coherent	

Boundar	Boundary		
Theme	Representation	Natural England Commentary	
	area of high amenity value, beauty and significance to wildlife species		
	The area of Crewes Valley, which forms a connective space between the village of Farleigh (east) through to Kings Wood (west), is a tranquil area only accessible using public rights of way. The distinctive curved valley with chalk and flint-rich paths through areas of woodland makes this a place of particular beauty.		
	The urban fringe of London sits to the north and due to good accessibility Kings Woods, Selsdon Wood and Hutchinson's Bank prove popular sites – these are just a stones-throw from Warlingham and Chelsham & Farleigh and further demonstrate that the area of attractiveness and landscape value extends much beyond Beddlestead Valley.'		
	ANON-PQ5Q-KRRZ-G and ANON-PQ5Q-KR33-A 'Beddlestead Valley is itself just one dry chalk valley in a system of related chalk valleys leading to and from Farleigh and Chelsham. There are at least 4 more dry valleys to the northwards [north], that flow north from Farleigh and Fickleshole, none of which have roads in them, unlike Beddlestead. In order to preserve and better incorporate this system, we believe that a larger Addition is needed, and not just the section of it at Beddlestead.'		
	Reasons given include:		
	 considerable body of local and county 		

Boundary	Boundary		
Theme	Representation	Natural England Commentary	
	 opinion that we feel deserves weight current Beddlestead Addition 11 is not far from Fickleshole Conservation Area, making the addition of Fickleshole, which Natural England has previously noted as a high-quality location, both possible and reasonable Fickleshole sits to the east of Grade II listed Elm Farm and Great Farleigh Green Conservation Area, containing a nationally rare acidic grass habitat managed by Surrey Wildlife Trust (new information since consultation stage), and bordered to the west by beautiful roadless Crewes Valley Inclusion of Great Farleigh Green would prevent Fickleshole from being an isolated northerly projection of the Beddlestead Addition Both Conservation Areas are in proximity to one another and are linked by public footpaths and ancient woodland or shaws. Each could be reached by the proposed Beddlestead Addition, and together these areas would form a sensible landscape unit of Chalk Down with Woodland, with a clearly defined boundary that all authorities agree would work Fairer treatment of AGLV landscape in our area where Woldingham Village was rapidly incorporated, but whilst a large amount of adjacent open countryside was left out. 		

Boundary	Boundary	
<u>Theme</u>	Representation	Natural England Commentary
	Proposed boundary	
	'the boundary of the parish [Farleigh and Chelsham] at its northernmost limit is also that of the district, offering another clearly defined boundary. We submit this proposal and appeal to Natural England for its support.'	
	ANON-PQ5Q-KR4U-D and ANON-PQ5Q-KR3Q-8	
	Reasons given include:	
	 Two Conservation Areas Farleigh Common is managed by Surrey Wildlife Trust and contains rare priority acid grass habitat (new information not available at the last consultation) Several ancient woodlands Patchwork of fields and woodland in Farleigh Listed and ancient buildings especially Grade 1 St Mary's at Farleigh Inclusion of Parish would connect well with the existing AONB along Clarke's Lane Close to and accessible from large centre of population Risk that AGLV will disappear – over 60% of land in Tandridge will lose its status as AGLV. It currently performs a barrier against urban sprawl of London Fickleshole was noted by NE as high quality. 	

Boundary		
Theme	<u>Representation</u>	Natural England Commentary
	'this general area is accessible to a very large population, much larger than more remote AONB landscapes, and therefore, if preserved, would provide a much larger public benefit to the populations in proximity to the northwards towards London.'	
	Proposed boundary	
	'using the existing joint northern parish and district boundary. This would bring the entire parish into a clearly defined addition. We would add that the boundary of the parish at its northernmost limit is also that of the district, offering another clearly defined boundary.'	
	ANON-PQ5Q-KRP5-9 'I thoroughly agree that Beddlestead Valley should be included within the new boundary. It more than meets the natural beauty requirements.	
	At the same time I am very disappointed that the wider areas of Chelsham and Farleigh and beyond have been excluded.'	
	Reasons given include:	
	 extensive area of great beauty peaceful areas of open fields and ancient woodlands interspersed by groups of pretty cottages and houses close to the built-up areas of London but 	

Boundar	Boundary	
Theme	Representation	Natural England Commentary
	 only localised influence from traffic many quiet, pretty lanes and footpaths which give a feeling of remoteness and are a joy for walkers and many others. Farleigh Common with its rare acid grass habitat managed by Surrey Wildlife Trust who plan to rewild the area. extend it further into King's Wood and Selsdon Woods - Hutchison's Bank, is an important nature reserve and a rare butterfly habitat easily accessible on foot and by public transport loss of its AGLV status will lead to a degradation of the area and lead to a great reduction in the pleasure it now affords to many. 	
	ANON-PQ5Q-KRHC-F This respondent included evidence supporting the inclusion of the whole of Chelsham and Farleigh Parishes and provided similar evidence to that of other respondents. It went on to specifically request the inclusion of Selsdon Wood. The following reasons for inclusion are summarised below:	
	Selsdon Wood mirrors the ancient woodlands in the parish, whose patchwork of fields and woodlands is well-documented as being medieval in layout. The wood was historically used as a hunting ground by the Archbishops of Canterbury and royalty and	

Boundary	Boundary		
Theme	Representation	Natural England Commentary	
	 also as a workplace for charcoal burners and the location of decoys in WW2 Inclusion of the ancient woods, fields and other scenic areas to the north and east i.e. Selsdon Wood, King's Wood, Hutchison's Bank Footpaths through Selsdon Wood etc link easily with the paths to all these neighbouring areas so it seems only logical that they are all within the one AONB General area is accessible to a very large population, much larger than more remote AONB landscapes, and therefore if preserved, it will provide a much larger public benefit to the populations in proximity to the north towards London. 		
	There is a danger that Surrey might end up with insufficient protected, high-value landscape as a result of a review that failed to include enough AGLV, given that AGLV status will disappear from all areas not included in the new AONB boundary. Selsdon Wood is such an area, as it is on a continuation of the characteristic dry chalk grasslands of the existing AONB.		
Include land further to the north including Chelsham and Farleigh	A number of respondents requested an extension to include the Parish of Chelsham and Farleigh and including the Beddlestead Valley, providing substantial submissions. The Beddlestead Valley is addressed above. Respondents include: ANON-VUXE-W5UR-U (Surrey County Council), ANON-VUXE-WE5W-G	Commentary Natural England acknowledges the number of respondents which have presented very detailed analysis and evidence associated with the Parishes of Chelsham and Farleigh. The response and commentary provided here addresses the main concerns raised. Natural England wishes to reassure respondents that although not every point made has been answered in this commentary, all the detailed evidence provided has	

Boundary	Boundary		
<u>Theme</u>	Representation	Natural England Commentary	
	(Tandridge District Council), ANON-VUXE-WE2K-1, ANON-VUXE-WS1X-U, ANON-VUXE-WEZ4-J,	been carefully reviewed. A considered responses to each of the main concerns is set out below.	
	ANON-VUXE-WENW.	Sub-division of Evaluation Area	
	There was a degree of overlap between respondent's views with many presenting the same reasoning and evidence. A number of specific criticisms were raised regarding the approach and assessment undertaken by Natural England. These are summarised below: Sub-division of Evaluation Area Many raised objections based on the methods employed to subdivide the Evaluation Area claiming that this resulted in wider areas beyond the Parish of Chelsham and Farleigh being included in the assessment which subsequently impacted	The division of Evaluation Area 9 into three subareas was not based on Parishes but rather on areas of similar character to be used as a framework to make the practical work of detailed evaluation of landscape more manageable. It is not intended to lead to the designation or exclusion from designation of any land merely because of the way in which Evaluation Areas have been defined (para 4.4. of Natural England Guidance). The division of Evaluation Areas and their extent reflects the original Area of Search provided to the consultants by Natural England and the MAG for the project with some further extensions where evidence was submitted as a result of the 'Call for Evidence'. Inconsistency in Judgements The assessment of natural beauty is undertaken across an area, not on a field by field basis (refer to Natural England Guidance para 5.3 4th bullet). In undertaking an	
	judgements. Inconsistency in judgements Others considered each of the negative aspects	assessment, focus is given to the factors which contribute to natural beauty and evidence gathered to determine the weight of evidence supporting each factor. At the end of the process a judgment is made as to whether there is sufficient weight of evidence for natural beauty to support designation.	
	noted in the Natural Beauty Assessment Report and compared them with similar aspects in other proposed Extension Areas to demonstrate inconsistency in judgements and to make the case that Chelsham and Farleigh Parish are equally as good as other Extension Areas. The rational for the comparisons was that if other proposed areas for designation include major roads, railway line, golf courses, playing fields, horse paddocks, ugly fencing, hedgerow loss, verge erosion, large bars,	In all areas, especially in a context such as Surrey and on the edge of London, it is inevitable that some areas of lesser quality land or some incongruous features are included within a proposed areas for designation. Natural England Guidance states that there is no requirement that every parcel of land must meet the criterion. However, it goes on to state that '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.	
	scarpyards, masts, quarries, fly tipping, rubbish and inaccessible areas, then EA9c should be included too, even if it has some of these features also.	extent that it affects the ability of the area as a whole to meet the technical criteria, then the entire Evaluation Area is unlikely to qualify.' (para 5.3 6th and 7th bullet).	

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
	Inconsistent Treatment of Settlements ANON-VUXE-WEZY-Q cited the inclusion of the village of Woldingham and exclusion of dispersed pattern of development in Chelsham and Farleigh as inconsistent. Effect of Excluding Beddlestead Valley Concerns were raised by ANON-VUXE-WEV3-D regarding the downplaying of natural beauty in the Beddlestead Area which has led to the quality landscape of Chelsham, Farleigh, Fickleshole and Crewes Valley being excluded also. 'To only include the Beddlestead Valley would serve to divide an otherwise meaningful Parish whole and also be difficult to demarcate.'	The presence of incongruous features or areas of lesser quality do not, in themselves, determine if land qualifies for designation or not. Rather it is how these incongruous features or patches of lesser quality land sit within a wider tract of qualifying land and the extent to which qualifying land enables patches of lesser quality to be included. In a landscape which lacks outstanding or distinguishing features and where landscape quality and scenic quality may be lower, the presence of incongruous features may tip the weight of evidence in favour of exclusion whereas an outstanding dramatic and distinctive landscape which has high scenic quality may contain some incongruous features but may overall qualify for designation, nonetheless. This is a carefully balanced judgement which is reached when taking all factors and evidence into account. It is understandable that a look at incongruous features within the Chelsham and Farleigh area and a comparison with other areas proposed for inclusion in the AONB may, at first glance, appear inconsistent. However, when considered in the context of the clearly defined approach set out in Natural England Guidance, it is clear that it is the weight of evidence relating to the natural beauty factors which determines which areas qualify.
	Natural Beauty Many acknowledged the positive recording of	Inconsistent Treatment of Settlements
	natural beauty of the area in the Natural Beauty Assessment table but felt the conclusion that the area was fragmented was not justified. They also reiterated the following positive qualities of this area including: Beautiful diversity of rolling hillsides and	In line within Natural England guidance settlements are each considered on their merits. Where settlements form part of a wider tract of qualifying land (as in the case of Woldingham) they are included so long as they make a positive contribution to the surrounding area. Where settlements lie on the edge of qualifying land they are excluded. High quality settlements which lie beyond qualifying land are not included.
	 natural woods Nationally rare habitat of Great Farleigh Green SNCI – unimproved acid grassland. St Mary's Church Farleigh – 13th Century 	The settlements of Farleigh and Chelsham are acknowledged as small in scale and rural in nature and contain some buildings of cultural heritage significance that contribute to sense of place. However, they are not considered to sit within a wider sweep of qualifying land (see below).
	Ancient woodland, shaws and commonsConservation AreaHigh tranquillity and dark skies	Effects of Excluding Beddlestead Valley

Boundary		
Theme	Representation	Natural England Commentary
	 Large barns at Cheverells Farm do not undermine natural beauty and barns at Botley Hill (included) have more impact Cultural heritage assets No major roads Existing AGLV and therefore a valued landscape and more than ordinary countryside AGLV and Green Belt means it remains 	Concerns regarding the exclusion of the Beddlestead Valley as a reason for not including the Chelsham and Farleigh area have been addressed with the decision to include the Beddlestead Valley as noted above. AGLV The Natural Beauty Assessment highlighted that AGLV designation does not automatically mean that a landscape will qualify for national designation, although it is acknowledged that recognition as AGLV is an indication that the landscape expresses qualities which are valued at a local level. There are many areas of AGLV which have not been proposed for inclusion in the AONB extensions.
	intactProposed extension excludes areas of	Comparison with other Extension Areas
	 AGLV and areas with no landscape value included Four dry chalk valley nature reserves (Hutchinson's Bank, Threecorner Grove, Chapel Bank and south-west of New 	Comparison was made with other areas proposed for inclusion within the AONB extension to make the case that the Chelsham and Farleigh area is no worse, and in many cases considered superior to sites proposed for designation elsewhere in Tandridge.
	Addington) and Selsdon Wood Nature Reserve all support habitat and species rare in the context of London	It is important to make judgements in a consistent way where similar circumstances exist. However, it is also important to understand that each area assessed has a unique set of circumstances and context as well as features, characteristics and qualities. Each area is therefore considered on its merits.
	Vulnerable given proximity to London Acts as a 'buffer' to protect the integrity of the AONB, with many views from AONB into this landscape	Natural England has also reviewed the proposed Extension Areas where respondents have highlighted incongruous features to be sure that they do not undermine the conclusions reached. Natural England can confirm that it does not consider these features to substantially undermine natural beauty across the wider tract of land proposed for inclusion.
	 Same planning policies to 'conserve and protect have applied to the AONB and 	Natural Beauty
	AGLV as set out in Tandridge Distidct Core Strategy 2008-2026 (polices CSP20 and	It is noted that a number of respondents felt the Natural Beauty Assessment had unjustifiably excluded the Chelsham and Farleigh area.
	CSP21)East Surrey has the smallest amount of land in the AONB	The Natural Beauty Assessment considered the Farleigh area as EA9c. It concluded that the area had 'a mixed weight of evidence' noting that the extensive ancient woodlands, wooded shaws, historic commons, winding rural lanes and historic

Boundary		
Theme	<u>Representation</u>	Natural England Commentary
	Broadly captures the Capital Downs Living Landscapes area and aligns with landscape scale approaches to nature recovery. Proposed Boundary Respondents all submitted the same map which puts forward a boundary including Beddlestead Valley and the majority of the Chelsham and Farleigh Parish, excluding areas beyond the Parish to the north and northeast and also areas of development on the edge of Warlingham and Greatpark. ANON-VUXE-WE1K-Z made the case that a further small addition of land should be made on the edge of Warlingham: 'an untouched piece of land and has been for the last 40 to 50 years (after speaking to locals, I have obtained this information). Within this period of time many trees have grown and no doubt become home to birds and wildlife. The land is left to grow all year so this is an ideal place for all sorts of animals to live and use, while being away from any humans this small area is stunning and is home to wildlife and trees'	settlements contribute to a historic landscape pattern with a high biodiversity value. It noted areas of higher natural beauty in the enclosed ancient woodlands and narrow north-south aligned dry valleys but also concluded that areas of higher quality were fragmented by areas of lesser quality. Areas of lesser quality were noted as being influenced by residential development, agricultural and equestrian infrastructure and extensive golf courses. Natural England has reviewed this area in light of submissions. Having identified qualifying land to the south in the Halliloo Valley and Beddelstead Valley, consideration was given to the land lying immediately to the north and west. Land to the north of Beech Farm and including Washpond Lane and Ledgers Road was considered to be in transition reflecting a more open and less topographically varied landscape affected by the cumulative effects of masts (four in total), intensive open arable farmland, busy roads and considerable signs of fly tipping. Moving north of Hesiers Road the landscape continues to lack the topographic drama of the Beddlestead Valley forming an open arable plateau with large scale fields which lack distinction. West of Fairchildes Road however the landscape starts to drop into the north-south valley which extends between Ledgers Farm and Chapel Hill. On the eastern fringes of the valley is the isolated church of St Leonard's, Chelsham and the small historic hamlet of Ficklestowe. The cultural heritage interest and vernacular architecture expressed in this built form contributes to the scenic qualities of the valley landscape along with the patterns of pasture and woodland on the valley sides. This area is considered to have a higher level of natural beauty but extends as a narrow finger, northwards. To the west of this area the landscape again becomes flatter and the extensive woodland cover (although of interest) lacks distinction and is influenced by development associated with Greatpark. To the north of this the land starts to dip into the vall

Boundary	Boundary		
<u>Theme</u>	Representation	Natural England Commentary	
		Given these findings, consideration was given to the inclusion of the valley between Ledgers Farm and Chapel Hill. However, the link between the valley and wider qualifying area of the Beddlestead Valley would require the application of wash over to the south and east. Given the peripheral location of the valley, and that the extent of the qualifying area is small and that an area of similar if not larger scale would need to be washed over for it to be included, Natural England concludes that on balance the area should not be included within the proposed extension to the AONB.	
		Respondents considered that the issues of residential development, agriculture and equestrian infrastructure and golf courses noted in the Natural Beauty Assessment Report, also affect other areas which had been proposed for inclusion in the AONB, and this showed inconsistency. As noted above focus on incongruous features and their presence or absence is not the means by which natural beauty is assessed. Consideration is given to tracts of land where the combination of characteristics and features give rise to qualities which contribute to or detract from natural beauty.	
		The area of Chelsham and Farleigh primarily consists of Chalk Downland with Woodland, and in the east of the area, Open Chalk Farmland. These landscape types are typical of the north downs dip slope which extent into the southern fringes of the London suburbs. Other areas of Chalk downland with woodland, which are included within the AONB extensions, include the Halliloo Valley to the south, Chipstead Valleys, and Headley Hills. All three of these areas have a drama and scale which gives rise to scenic qualities and varied views. Where these areas lie adjacent to urban areas or where the landscape is affected by urban fringe uses the boundary has been drawn back to include only land which has sufficient natural beauty. Similarly, other areas of Open Chalk Farmland which are included in the AONB extensions include the landscape east of Woldingham (including the Beddlestead valley as noted above) and Happy Valley. Again, these areas have a drama and scale which gives rise to scenic qualities and varied views, as well as cultural and natural heritage and marks the areas out above ordinary/wider countryside.	
		The Chelsham and Farleigh area is not the only area to have been excluded from the proposed AONB extension despite having positive qualities. Other areas which have on balance been considered to lack qualities which are nationally outstanding include significant parts of the Low Weald. The Low Weald landscape contains many areas of	

Boundary		
Theme	Representation	Natural England Commentary
		ancient woodland is intact and is a tranquil landscape but it is nonetheless not regarded as having sufficient natural beauty to warrant national designation.
		Having reviewed the evidence submitted, Natural England is of the view that the qualities of the Chelsham and Farleigh area are not sufficiently outstanding to qualify for designation as AONB.
		Conclusion No change.
Request for Excl	usion of Areas	
Exclusion of Proposed Extension Area	ANON-VUXE-WECV-W does not agree that the area proposed for designation meets the natural beauty criterion. The reasons given included: 'Unfortunately, there has been a number of unauthorised buildings which are the subject of various planning enforcements which do not seem to have any realistic prospect of success in removing the various mobile homes and field shelters etc. which are not in keeping with the rural setting. In addition, there are a number of mobile phone masts and other telecommunications equipment such as an Airwave tower in the area which detract from the natural environment. Also there are an increasing number of business jet flights landing at Biggin Hill Airport which given the proximity of the airfield are flying low over the valleys with landing gear down on final approach.	Commentary The detailed justification for including this area within the proposed boundary extension is set out in the Natural Beauty Assessment Report in relation to Evaluation 9a pages 123 to 127. This assessment has taken account of existing built development and its effects on landscape condition and scenic quality as well as the effects of masts and telecommunication equipment. It has also considered aspects relating to tranquillity and noise from overhead aircraft. This detailed analysis has resulted in much of this Evaluation Area being put forward as a Candidate Area for designation. The Boundary Report sets out the rational for the detailed boundary on pages 38-39. Natural England does not accept that the issues raised undermine the landscape to such a degree that it should not be put forward for designation. Natural England notes concerns regarding increased bureaucracy and planning issues and these are addressed in detail in Appendix 2. Conclusion No change.

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
	The designationwould result in an additional layer of bureaucracy and more issues with planning etc which would be at odds with the failure of the current system to control these unauthorised buildings.'	