

Appendix 14: Woldingham Valleys

Please refer to Figure 22a

Overview

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

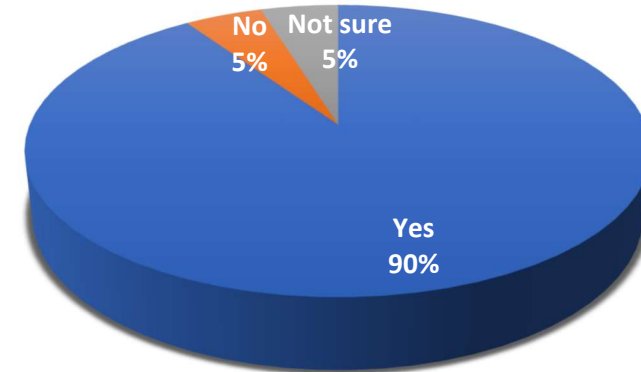
Natural Beauty	Responses
Yes	38
No	2
Not sure	2

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.

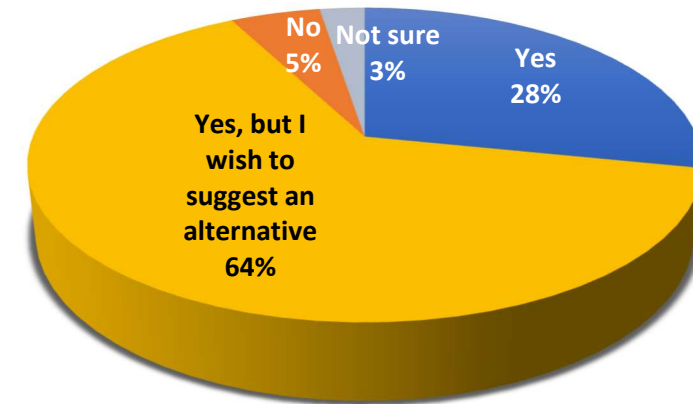
The additional areas of land that respondents wish to see included within the proposed extension are:

- Beddlestead Valley and Tatsfield Slopes
- Land to the north including Chelsham and Farleigh
- Land at the western end of Hallaloo 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



Natural Beauty		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
The proposed extension meets the Natural Beauty Criterion	<p>Many respondents agreed that the proposed extension met the natural beauty criterion.</p> <p>ANON-VUXE-WE1K-Z <i>'Yes, all the area in the new extension are very much welcome.'</i></p> <p>ANON-VUXE-WEVE-Y <i>'[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 AONB..... We 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.'</i></p> <p>ANON-VUXE-WEC9-Z <i>'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.'</i></p> <p>ANON-VUXE-WMYX-W <i>'We fully support the extension of the AONB as this would help to protect the area from unsuitable development and maintain its natural beauty.'</i></p> <p>ANON-VUXE-WEPN-2 <i>'Striking and distinctive scenery which reveals the geology and geomorphology of the area, provides relative</i></p>	<p><u>Commentary</u></p> <p>Natural England agrees that land within the proposed Extension Area meets the natural beauty criterion for designation as AONB and that additional evidence provided by respondents supports the findings of the Natural Beauty Assessment.</p>

Natural Beauty		
<u>Theme</u>	<u>Representations</u>	<u>Natural England Commentary</u>
	<i>tranquillity and contributes to the story of the Wandle Valley and its upper catchment of chalk landscapes and dry valleys.'</i>	
The proposed extension does not meet the Natural Beauty Criterion	<p>ANON-VUXE-W5T8-Z considered the area did not meet the Natural Beauty Criterion. No justification was given.</p> <p>ANON-VUXE-WECV-W <i>'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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>The designation....would 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.'</i></p>	<p>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.</p> <p>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.</p> <p>Natural England notes concerns regarding increased bureaucracy and planning issues and these are addressed in detail in Appendix 2.</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
General agreement with proposed boundary	<p>A number of respondents agreed with the proposed boundary simply answering yes to the consultation question and providing no additional information. Some did provide additional commentary including:</p> <p>ANON-VUXE-WSQJ-D <i>'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.'</i></p> <p>ANON-VUXE-WERP-6 <i>'I think this takes in all the countryside left in the area which needs protecting from the encroachment of London.'</i></p>	<p><u>Commentary</u></p> <p>Natural England notes the support for the proposed boundary and has provided a detailed commentary to the boundary issues raised by other respondents, which can be found below.</p>
Requests for Additional Areas		
Include parcel of land west of A22 on edge of Caterham	<p>ANON-VUXE-WENG-S made the case that this land should be included in the AONB on the basis that:</p> <ul style="list-style-type: none"> 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 	<p><u>Commentary</u></p> <p>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'.</p> <p>Historically this area of land has not been recognised as AGLV.</p> <p>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.</p> <p>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.</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<p>dramatic when rainbows are seen in their entirety in the field against the darkened sky.</p> <ul style="list-style-type: none"> • 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 well-being • 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 	<p><u>Conclusion</u> No change.</p>
<p>Extend boundary to include land between railway and A22 north of Birchwood House Farm</p>	<p>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:</p> <p>Natural Beauty</p> <ul style="list-style-type: none"> • Landscape character of both the existing and extended AONB extend seamlessly to the settlement edge of Warlingham – the landscape is not transitional • Intervisibility between the existing/extended AONB 	<p><u>Commentary</u></p> <p>The Natural Beauty Assessment Report considered this area as part of EA9a. It noted on page 123 in relation to landscape quality that <i>‘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.’</i></p> <p>The area was not identified as falling within the proposed Candidate Area which extended as far as the railway.</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<ul style="list-style-type: none"> 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. <p>Desirability</p> <ul style="list-style-type: none"> 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. <p>Boundary</p> <ul style="list-style-type: none"> The proposed boundary is neither durable or defensible because it relies upon hedgerows and tracks that can be removed at any time. 	<p>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 <i>'the transitional nature of the valley and influence of equestrian uses and fragmentation as a result of roads and railway...'</i> It notes that <i>'a boundary was drawn within the transition including the higher quality areas.'</i></p> <p>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.</p> <p>The proposed boundary has been arrived at due to a need to address the transitional qualities of land west of the railway and to address 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 also acknowledges that having reached this position, it leaves a relatively small triangle of land to the north beyond the proposed boundary extension.</p> <p>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, it nonetheless acknowledges that the start of the valley is clearly apparent on exiting the roundabout along Woldingham Road. The distinctive dramatic landform of the Halliloo Valley remains clearly expressed. This area of land is in reasonable condition and in agricultural use. On this basis, and given the unique context of these issues, Natural England has made a pragmatic decision to take the boundary further north to the railway, thereby bringing in all of this land within the proposed boundary extension.</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<ul style="list-style-type: none"> 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 	<p><u>Conclusion</u> Minor addition to include western edge of Hallaloo Valley.</p> <p>(Addition 10 – Refer to Fig 22a)</p>
<p>Extend boundary to include Beddlestead Valley and Tatsfield Slopes</p>	<p>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.</p> <p>Whilst they agreed with positive comments about the area, set out in the Natural Beauty Assessment, they disagreed with the conclusions to exclude the area for the following reasons:</p> <p>Natural Beauty</p> <ul style="list-style-type: none"> 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 	<p><u>Commentary</u></p> <p>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.</p> <p>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 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.</p> <p>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.</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<ul style="list-style-type: none"> 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 Inappropriate to set a higher standard for this area than for areas that are already within the existing AONB. <p>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.</p>	<p>It concluded '<i>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.</i>'</p> <p>This decision has now been reviewed in light of the consultation responses.</p> <p>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.</p> <p>The assessment found:</p> <ul style="list-style-type: none"> High quality land sweeps in close to the urban edge of Tatsfield with often relatively abrupt changes between the qualifying areas and urban development. 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. <p>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</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
		<p>valley slopes which make a contribution to the scenic compositions experienced through the valley system and which are of themselves of high quality.</p> <p>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).</p> <p><u>Conclusion</u> Addition to include the Beddlestead Valley.</p> <p>(Addition 11 – Refer to Figure 22a)</p>
<p>Include land further to the north including Chelsham and Farleigh</p>	<p>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.</p> <p>Respondents include: ANON-VUXE-W5UR-U (Surrey County Council), ANON-VUXE-WE5W-G (Tandridge District Council), ANON-VUXE-WE2K-1, ANON-VUXE-WS1X-U, ANON-VUXE-WEZ4-J, ANON-VUXE-WENW.</p> <p>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:</p> <p><u>Sub-division of Evaluation Area</u></p>	<p><u>Commentary</u></p> <p>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 been carefully reviewed. A considered responses to each of the main concerns is set out below.</p> <p><u>Sub-division of Evaluation Area</u></p> <p>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'.</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<p>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 judgements.</p> <p><u>Inconsistency in judgements</u> Others considered each of the negative aspects 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 rationale 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, scarp yards, masts, quarries, fly tipping, rubbish and inaccessible areas, then EA9c should be included too, even if it has some of these features also.</p> <p><u>Inconsistent Treatment of Settlements</u> 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.</p> <p><u>Effect of Excluding Beddlestead Valley</u> 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</p>	<p><u>Inconsistency in Judgements</u> 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 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.</p> <p>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 <i>'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><i>If an area is fragmented by land which does not meet the technical criteria to such an 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.'</i> (para 5.3 6th and 7th bullet).</p> <p>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.</p> <p>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</p>

Boundary		
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	<p>Crewes Valley being excluded also. <i>‘To only include the Beddlestead Valley would serve to divide an otherwise meaningful Parish whole and also be difficult to demarcate.’</i></p> <p><u>Natural Beauty</u> Many acknowledged the positive recording of 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:</p> <ul style="list-style-type: none"> • Beautiful diversity of rolling hillsides and natural woods • Nationally rare habitat of Great Farleigh Green SNCI – unimproved acid grassland. • St Mary’s Church Farleigh – 13th Century • Ancient woodland, shaws and commons • Conservation Area • High tranquillity and dark skies • 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 intact • Proposed extension excludes areas of AGLV and areas with no landscape value included 	<p>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.</p> <p><u>Inconsistent Treatment of Settlements</u> 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.</p> <p>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).</p> <p><u>Effects of Excluding Beddlestead Valley</u> 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.</p> <p><u>AGLV</u> 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.</p> <p><u>Comparison with other Extension Areas</u> 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.</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<ul style="list-style-type: none"> Four dry chalk valley nature reserves (Hutchinson’s Bank, Threecorner Grove, Chapel Bank and south-west of New Addington) and Selsdon Wood Nature Reserve all support habitat and species rare in the context of London <p><u>Desirability</u></p> <ul style="list-style-type: none"> Vulnerable given proximity to London Acts as a ‘buffer’ to protect the integrity of the AONB, with many views from AONB into this landscape Same planning policies to ‘conserve and protect have applied to the AONB and AGLV as set out in Tandridge District Core Strategy 2008-2026 (policies CSP20 and CSP21) East Surrey has the smallest amount of land in the AONB Broadly captures the Capital Downs Living Landscapes area and aligns with landscape scale approaches to nature recovery. <p><u>Proposed Boundary</u> 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.</p>	<p>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.</p> <p>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.</p> <p><u>Natural Beauty</u></p> <p>It is noted that a number of respondents felt the Natural Beauty Assessment had unjustifiably excluded the Chelsham and Farleigh area.</p> <p>The Natural Beauty Assessment considered the Farleigh area as EA9c. It concluded that the area had ‘a <i>mixed weight of evidence</i>’ noting that the extensive ancient woodlands, wooded shaws, historic commons, winding rural lanes and historic 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.</p> <p>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</p>

Boundary		
<u>Theme</u>	<u>Representation</u>	<u>Recommended Natural England Commentary</u>
	<p>ANON-VUXE-WE1K-Z made the case that a further small addition of land should be made on the edge of Warlingham:</p> <p><i>'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..'</i></p>	<p>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 valleys of Haggler's Dean and Farleigh Dean, both of which are used extensively as golf courses, and to the south the landscape forms attractive countryside comprising a mixture of arable and pasture, equestrian uses and woodland. The dispersed pattern of settlement surrounding Chelsham is predominately modern and there is a quick succession between the fringes of Warlingham to Chelsham to Greatpark such that the landscape feels settled. Overall, these areas are not considered to have sufficient natural beauty to warrant designation as a national landscape.</p> <p>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.</p> <p>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.</p> <p>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</p>

Boundary		
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		<p>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.</p> <p>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 ancient woodland is intact and is a tranquil landscape but it is nonetheless not regarded as having sufficient natural beauty to warrant national designation.</p> <p>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.</p> <p><u>Conclusion</u> No change.</p>
Request for Exclusion of Areas		
Exclusion of Proposed Extension Area	<p>ANON-VUXE-WECV-W does not agree that the area proposed for designation meets the natural beauty criterion. The reasons given included:</p> <p><i>'Unfortunately, there has been a number of unauthorised buildings which are the subject of various planning enforcements which do not seem</i></p>	<p><u>Commentary</u></p> <p>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</p>

Boundary		
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	<p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>The designation....would 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.'</i></p>	<p>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 rationale for the detailed boundary on pages 38-39.</p> <p>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.</p> <p>Natural England notes concerns regarding increased bureaucracy and planning issues and these are addressed in detail in Appendix 2.</p> <p><u>Conclusion</u> No change.</p>