## **Appendix 12: Happy Valley**

## Please refer to Figure 21a

## Overview

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

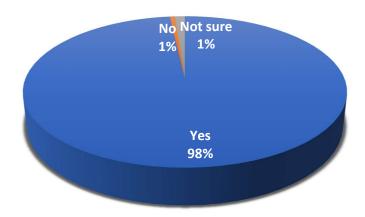
Natural Beauty	Responses
Yes	166
No	1
Not sure	2

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

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

In terms of desirability, respondents advanced arguments in support, mainly relating to the need for protection from development, threats to integrity and value of community access to open spaces. Other respondents advanced arguments against tighter planning restriction, increased house prices and that the area is already protected. These are addressed in Appendix 2.

Happy Valley - Sufficient natural beauty to be designated



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

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

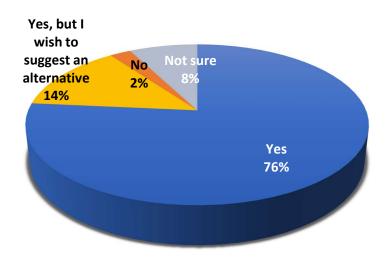
This area attracted a large number of responses. Of the 170 respondents, 130 respondents (76%) agreed with the proposed boundary for the Happy Valley Extension Area and 4 respondents (2%) did not. 23 respondents (14%) agreed but wished to suggest an alternative boundary for the Extension Area, many providing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

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

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

There are no requested exclusions.

Happy Valley - Agreement with the proposed boundary



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

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

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

Natural Beauty		
Theme	Representations	Natural England Commentary
	ANON-VUXE-W5GC-X 'As many parts of it are accessible only on foot it retains a magical tranquillity which provides a wonderful restorative for the mental health of the local population.'	
The proposed extension does not meet the Natural Beauty Criterion	ANON-VUXE-W5T8-Z, ANON-VUXE-WEXE-1, ANON-VUXE-W5G7-J-Z, and ANON-VUXE-W5ET-D all considered the area did not meet the Natural Beauty Criterion, although no justification was given.	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.

Boundary			
Theme	Representation	Natural England Commentary	
General agreement with proposed boundary	Many respondents agreed with the proposed boundary simply answering yes to the consultation question and providing no additional information. Some did provide additional commentary including:  ANON-VUXE-WM4V-P 'Seems to follow pretty obvious boundaries.'  ANON-VUXE-W5QZ-Y 'I live in and know the area very well and to my lay mans eye the proposed boundaries look to be about right.'  ANON-VUXE-WMEV-7 'The boundary makes sense.'  ANON-VUXE-WMXU-S 'It fits with natural boundaries.'  ANON-VUXE-WSQR-N 'Members support the inclusion of part of Farthing Downs in the proposed Happy Valley extension to the Surrey Hills AONB and the proposed boundary'.	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	Requests for Additional Areas		
Include northern tip of South London Downs National Nature Reserve	ANON-VUXE-W5N2-M 'The boundary at Farthing Downs continues down to the triangular point where Ditches Lane meets Marlpit Lane.'	Commentary  Natural England notes that the boundary of the National Nature Reserve extends northwards to meet Marlpit Lane comprising a northern tip of rough grassland and scrub. The proposed boundary follows the extent of open access land, SSSI designation and Scheduled Monument. Natural England considers that the post and rail fence and cattle grid, which marks the edge of the common, is the most appropriate	

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
		boundary for the proposed AONB designation in this instance, given that further north the land becomes a narrow finger which, in landscape and perceptual terms, is influenced by its urban context.
		Conclusion No change
Include open hillsides west of A23 (Hooley Estate and fields south of school)  Note this area formed part of EA7d but is discussed here due to intervisibility with Farthing Downs and A23 corridor	ANON-VUXE-WMC7-6 'I would only ask that a potential extension to this area be considered to cover the postcode CR5 3EH and small surrounding area. The houses here back onto and sit in between farmland which is a thorough fare for wildlife and such. It would be great if they could also be protected.'  ANON-VUXE-WEMY-A and ANON-VUXE-WEWD-Y made the case for the inclusion of additional open hillsides which are visible from Farthing Downs and which lie to the north and west of the A23. These hillsides include Cane Hill, Portnalls Road Field and settlement of Hooley House Estate/Hooley Valley.	Commentary  This area formed part of EA7d in the Natural Beauty Assessment. Under scenic quality the assessment stated 'Scenic quality is in transition and becomes significantly reduced towards the fringes of the area, where urban influences are more apparent, such as the edge of built-up areas, and busy road corridors.' The south western part of this area was included within the proposed Candidate Area as a result of the Elmore Road Residential Area of Special Character which is a feature of interest on the edge and contributes to the scenic qualities of the area and given its location between the existing AONB and proposed Extension Area further west. However, the northern more open slopes were excluded given their urban context and open aspect which is substantially affected by noise from the A23 corridor and surrounding development. This is confirmed in the Boundary Considerations Report page 31 which states 'the boundary was drawn further to the east in order to include historic buildings of interest and a small valley between High Road, Elmore Road and Hogcross Lane.'
issues	<ul> <li>Key reasons include:</li> <li>Intervisibility with Farthing Downs.</li> <li>Visually important open fields and wooded ridgelines.</li> <li>Interrelationship with Farthing Downs creating balanced views and harmony.</li> <li>Part of the setting of Farthing Downs.</li> <li>Foreground and prelude to Farthing Downs.</li> </ul>	The open slopes further north were also discussed in the assessment of Evaluation Area 8a [EA8a]. At page 111 of the Natural Beauty Assessment Report it states 'The scenic qualities of the steep slopes which face into the valley containing the A23 have been eroded by its use as a principle road corridor and by the urbanising influences of adjacent development.' On page 112 under tranquillity it states 'However, to the west the landscape drops into a valley containing the A23 corridor, where traffic noise and views across built-up areas are prominent.' It goes on to conclude at page 114 that 'The fringes of this area to the east and west including Chaldon, Netherne and the slopes of the A23 corridor, are not regarded as meeting the natural beauty criterion. These conclusions are pertinent to the A23 corridor slopes between Portnalls Road and the A23 which have similarly been excluded.'

Boundary	Boundary	
Theme	Representation	Natural England Commentary
	<ul> <li>Unique history including water tower of Cane Hill (landmark) and cultural associations.</li> <li>Railway line and Brighton Road (A23) are not visible.</li> <li>First area of countryside for people coming out of London.</li> <li>Desirability:         <ul> <li>Proximity of these open areas to southern London – ease of access</li> <li>AGLV exists in Surrey but not Croydon – an anomaly which should be addressed by the AONB boundary review.</li> <li>Include the 'context' landscape on which Farthing Downs and Happy Valley depend as 'threshold' landscapes.</li> </ul> </li> </ul>	This area has been reviewed, and Natural England has considered the new evidence submitted. The following points of clarification are made:  • Natural England Guidance (Appendix 4) is clear that cultural associations must relate to the landscape including where landscape has inspired people in terms of writing and literature, depiction of the landscape in art or where the landscape has associations with people or events/traditions which contribute to perceptions of natural beauty.  • The areas which are the subject of these responses form visually important open hillsides when viewed from Farthing Downs. Nevertheless, they are isolated areas which are physically separate from the core areas of qualifying land by development and infrastructure. This means that these areas are fragmented and are also influenced by adjoining incongruous features. Natural England Guidance is clear at para 5.3 7th bullet that fragmentation may affect the ability of a tract of land to qualify.  • Natural England acknowledges that these areas of landscape form an important setting to the proposed AONB extension and may be the first area of countryside on leaving London. Visual association is not sufficient to justify designation of land, nor is the first experience of countryside on leaving London. The land must meet the Natural Beauty Criterion.  Natural England remains of the view that the open slopes beyond Farthing Downs do not meet the Natural Beauty Criterion. This does not diminish the important role they play as prominent open countryside which forms a setting to qualifying areas (and the extent to which Para 182 of the NPPF would apply) nor the importance of the areas as open natural green space for local residents.  Conclusion  No change.

Boundary		
Theme	<u>Representation</u>	Natural England Commentary
Include Woodplace Farm Fields to the west of Farthing Hill	ANON-VUXE-WMBH-P Reasons given include:  Natural Beauty:	The Natural Beauty Assessment considered this area as part of EA8a (pages 111-114). Under Landscape Quality it notes 'The open common of Farthing Downs continues along a shoulder of elevated land. However, development has encroached into the adjacent lower lying land during the first half of the 20th century, eroding the rural context of the northern part of the downs.'  The fields west of Farthing Downs were reviewed. Here the land was considered to form a single uninterrupted sweep of landscape from Farthing Downs which dips into a shallow valley and rises again to the urban edge. Natural England therefore considers that this land is not influenced by the A23 corridor or adjacent urban areas which are set further back and screened by vegetation. The fields which form open downland and are under active grazing management form part of an uninterrupted sweep of landscape.  On balance, and given the unity between this land and Farthing Downs, Natural England has concluded that the boundary should be drawn further west to include these fields of open chalk grassland. The boundary follows hedgerows and property boundaries which are clear boundary features. Fields further north, which are subdivided for equestrian use and are more influenced by the proximity of the urban edge, are excluded.  Conclusion  Minor addition to include fields to the west of Farthing Downs.  (Addition 8 – Refer to Figure 21a)
Include New Hill to the east of Farthing Downs	ANON-VUXE-WMBH-P, ANON-VUXE-WS1R-N, ANON-VUXE-WEGQ-V, ANON-VUXE-W5BW-D.  Reasons given include:	Commentary  The Natural Beauty Assessment considered this area as part of EA8a (pages 111-114).  Under Landscape Quality it notes 'The open common of Farthing Downs continues
	Natural Beauty:  Managed through scrub clearance and sheep grazing.	along a shoulder of elevated land. However, development has encroached into the adjacent lower lying land during the first half of the 20 <sup>th</sup> century, eroding the rural context of the northern part of the downs.'

Boundary		
Theme	Representation	Natural England Commentary
	<ul> <li>Clearly visible from Farthing Downs.</li> <li>Forms part of the rolling landscape of Farthing Downs and Happy Valley.</li> <li>Rare wild flowers and pyramidal orchids.</li> <li>Single line of housing on either side of Chaldon Way between Farthing Downs</li> </ul>	In particular the Natural Beauty Assessment noted on page 110 that ' Incongruous elements in this landscape include the A23 and railway to the west of the area as well as fingers of built development which extend into lower lying land e.g. Chaldon Way'  It also notes on page 111 'The narrow, rounded ridgeline of Farthing Downs forms the
	and New Hill, is in the bottom of the valley and does not affect the landscape views from Farthing Downs	skyline in these views, and the built development within the northern part of the valley (along Chaldon Way) does not intrude.'
	Marks the entrance to Happy Valley.	In the Boundary Report on page 34 the assessment notes 'The strong topography and high levels of vegetation on the fringes of Happy Valley and along urban edges has
	<ul> <li>Desirability:</li> <li>Designation of this area would add additional protection and maintenance.</li> </ul>	enabled the boundary to be defined close to the built edge and as a result it often follows fence lines along the perimeter of properties.'
	The natural beauty of Happy Valley and Farthing Downs depends upon adjacent areas.	The Boundary Report highlighted the transitional quality of the landscape where it lies adjacent to the urban areas. Natural England has reviewed the boundary to the east of Farthing Downs. It acknowledges that although development of Chaldon Way intrudes on the landscape it is nonetheless set down in the landscape and the rising slopes to
	<ul> <li>Would add complication of administration and delay.</li> </ul>	the east of Farthing Downs remain physically connected to Happy Valley to the south.  Furthermore, the rising slopes east of Farthing Downs are part of the scenic composition of Happy Valley when seen from Farthing Downs. Natural England also
	Boundary:	notes that the proposed boundary by respondent <b>ANON-VUXE-WMBH-P</b> enables the flatter land adjacent to the urban area to be excluded.
	<b>ANON-VUXE-WMBH-P</b> put forward an alternative boundary:	For completeness, and to ensure consistency of approach, Natural England has also reviewed the definition of the boundary further to the southeast. Here it has concluded
	'Drive Road looks like a clear boundary so I can see why it was selected as the AONB boundary but on the ground it is just a footpath like many others.	that flatter less distinctive landscape has been included south of Coulston Road and that a more robust boundary can be drawn closer to the break in slope to Happy Valley which aligns with the Site of Special Scientific Interest. The boundary follows the edge
	The AONB boundary can be clearly demarcated by a footpath and line of trees which separates the western half of New Hill from the eastern half. This	of woodland and tracks.  Conclusion

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
	line of trees hides from view the more open eastern half which borders the built area.'  ANON-VUXE-WEGQ-V commented that:  'There must be a natural not artificial boundary to the AONB.'	Minor addition to include fields to east of Farthing Downs and deletion to exclude fields on more elevated, flatter land, south of Coulsdon Road, to ensure a consistent approach to defining the boundary.  (Addition 9 and Deletion 5: Refer to Figure 21a)
Include Surrey International Golf Course	ANON-VUXE-WSQD-7 and ANON-VUXE-WE22-8 (both identical submissions by Tandridge District Council), , ANON-VUXE-WEU9-J, ANON- VUXE-WEZP-E, ANON-VUXE-W58A-D, and ANON-VUXE-WEP2-6.  Reasons given include:  Natural Beauty:  Peaceful, tranquil and relatively wild, containing ancient woodland.  Golf club has [retained] much of the original features of the land.  Distinctive and dramatic landform with framed views.  Managed grassland allows landform to be appreciated.  Desirability:  Would prevent the owners of the golf club from failing to retain the natural beauty of the land.  Would prevent development and destruction of wildlife.  Helps avoid development creep from Croydon.	Natural Beauty The Natural Beauty Assessment considered this area as part of EA8a. On page 110 it notes that 'In the east traditional agricultural land uses give way to recreational and urban fringe uses, such as the Surrey National Golf Club and equestrian uses and pony paddocks e.g. Hooley Farm.' It goes on to state that 'In the south of the area heavy traffic along Rook Lane/B2031 which connects the A23, and Chaldon/Caterham undermines tranquillity locally.'  The Candidate Area was subsequently defined to exclude the golf course although it is recognised that this area forms part of the upper reaches of the Happy Valley and comprises some dramatic slopes and longer distance views.  The Boundary Considerations Report notes on page 34 that 'Ladn [Land] to the south of this was not considered to meet the natural beauty criterion due to the influence of the Surrey National golf course which has altered the downland character of the landscape, and coupled with the increasingly urban context, undermines natural beauty.'  Natural England has reviewed this as a result of the consultation responses. Natural England notes that the golf course extends across the upper reaches of Happy Valley which forms two smaller tributary valleys with a ridge of higher land between, on which is located the club house and car park. Northeast of this are two waterbodies on relatively high land with one including a water fountain. All of these features are not considered to reflect the natural qualities of the chalk valley. From some locations the

Boundary		
Theme	<u>Representation</u>	Natural England Commentary
	Boundary: Various boundary options were proposed.  ANON-VUXE-WSQD-7 and ANON-VUXE-WE22-8 (both identical submissions by Tandridge District Council) proposed a boundary up to the rear property boundaries in the east and along Rook Lane excluding Fryern Farm and extending west and south to also include the village of Chaldon.  ANON-VUXE-WEU9-J, ANON-VUXE-WEZP-E ANON-VUXE-W58A-D and ANON-VUXE-WEP2-6. did not suggest a specific boundary.	adjacent urban edge is visible across the golf course comprising Chaldon to the west and Caterham to the east and south. Closer to the B2031 traffic noise intrudes.  On balance, Natural England remains of the view that this area of land is transitional and that it has been influenced by golf course use and proximity to the urban edge despite its still strongly expressed chalk topography.  Natural England also notes that, unlike the remainder of Happy Valley, this area is not designated a Site of Special Scientific Interest or Site of Nature Conservation Importance, and this further reinforces the lower weight of evidence supporting natural beauty. Natural England notes that some respondents eg ANON-VUXE-WMC5-4, acknowledge that the use of the valley as a golf course has impacted on its special qualities.  Desirability  For land to be considered desirable to designate it must first meet the Natural Beauty Criterion. Given that the area is not considered to qualify in terms of its natural beauty, Natural England has not considered it in terms of desirability.  Conclusion  No change.
Include whole of Chaldon and pasture fields to the south inc. Roffes Lane, up to the North Downs Ridge and Six Brothers Field	ANON-VUXE-WE22-8 and ANON-VUXE-WSQD-7 (Tandridge District Council), ANON-VUXE-WEU9-J, ANON-VUXE-WEAP-N, ANON-VUXE-WEZP-E, ANON-VUXE-WE1P-5 Reasons given include:  Natural Beauty:  Roffes Lane is an ancient trackway  Mature trees and hedgerows	Commentary  This area was considered in the Natural Beauty Assessment Report as part of EA8a which noted 'linear development along lanes, coupled with urban fringe land use, has given this area a more peri-urban character.' Natural England acknowledges that some rural qualities associated with the lanes and fields is evident but overall, it is regarded as transitional and not as intact as land to the north and west. It was subsequently excluded from the Candidate Area.
	Small country roads of Doctors Lane, Church Lane and Rook Lane	This view concurs with the Surrey Landscape Character Assessment which notes that 'a significant proportion of the overall character area includes small parcels of land such as paddocks, associated with low density dwellings with well vegetated boundaries and

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
	Six Brothers Field has a sense of peace and tranquillity Ancient woodland Chaldon Church is a Scheduled Monument Gently sloping fields Limited expansion of Chaldon in the 20 <sup>th</sup> century – retains village character Not of suburban character Chaldon Conservation Area Part of the AGLV Continuity with Farthing Downs and Happy Valley Intact landscape structure of woodland and hedgerows Listed buildings x 3 Character area CD4 'Chaldon Chalk Down with Woodland' sets out positive qualities.  Desirability: Address flooding issues along Roffes Lane Designate as AONB while further legislation on nature recovery is developed.  Boundary: ANON-VUXE-WE22-8 and ANON-VUXE-WSQD-7 (Tandridge District Council) suggested an alternative boundary extending between the proposed extension and the existing AONB and with an eastern boundary following the defined urban edge but also the piecemeal development around the entrance to the golf course along Rook Lane.	hedgerows. The northern part of the character area encompasses the Surrey National golf course.' It goes on to state that 'low density residential development in the character area and the influence of adjacent settlement reduces tranquillity and remoteness.'  Natural England does not agree that Chaldon Church is a scheduled monument, although it does note that the church is Grade I Listed and is included in the proposed extension. Although part of Chaldon is a Conservation Area, it is noted that across the area as a whole, there are relatively few listed buildings with much of the development being varied in age and character. Natural England accepts that Chaldon settlement is lower density and more rural than Caterham to the east but, nonetheless, the extent of development, coupled with equestrian uses, means that it has a more peri-urban character and lacks the rural characteristics and qualities found further to the north into the Happy Valley.  Natural England does not consider the decision to exclude Chaldon village is inconsistent with the decision to include War Coppice Road within the Caterham Woods Extension Area. The landscape context and nature of development is not the same. Development at War Coppice Garden Village consists of 19th century and 20th century Arts and Crafts housing and has a strong architectural style and unity which contributes to local distinctiveness.  Natural England agrees with respondent ANON-VUXE-WS18-U 'It is accepted regretfully that the boundary at Chaldon is influenced by the presence of urban edge and pony paddocks south of the village, which whilst relatively low density have created a degree of visual clutter with horse shelters, storage and post and rail fencing replacing hedgerows.'  North of the existing AONB boundary at Willey Park Farm the land is sloping away towards the urban edge and is less dramatic. Nevertheless, Natural England accepts that the AONB boundary lies to the south along Pilgrims' Lane, however that would require a small area of land to be de-desi

Boundary		
Theme	Representation	Natural England Commentary
	ANON-VUXE-WE1P-5 Noted an inconsistency between the exclusion of Chaldon and the inclusion of War Coppice Road but also acknowledge there were 'some incongruous features within the village [Chaldon].'	Conclusion No change.
Include Coulson Common, Kenley Airfield, Kenley Common, Dollyper's Hill, Coulsdon Manor golf	ANON-VUXE-WSKR-F (London Borough of Croydon), ANON-VUXE-WEU9-J, ANON-VUXE-WEEN-Q, ANON-VUXE-WS1R-N, ANON-VUXE-WEAP-N, ANON-VUXE-WEGG-J, ANON-VUXE-WMG3-6, ANON-VUXE-WMJ3-9, ANON-VUXE-WEGQ-V  Reasons given included:	Commentary  Natural England considered this area as part of EA8b in the Natural Beauty Assessment Report. It concluded on pages 117 that 'The fragments of semi natural greenspace where there is wood pasture and chalk grassland are highly valued in the context of South London. However, these landscapes comprise relatively small pockets, fragmented by an urban context and physically separated from the wider AONB by Caterham and Chaldon.
course	<ul> <li>Natural Beauty:</li> <li>Nature Reserve supporting populations of chalk grassland butterflies</li> <li>Dollyper's Hill is cut by a dry valley</li> <li>Mosaic of calcareous grassland, scrub and woodland</li> <li>Kenley Lane bluebell woods and verges</li> <li>Veteran trees on commons</li> <li>Kenley Aerodrome is a [site] of cultural military heritage</li> <li>Kenley Aerodrome is a beautiful open space with species rich grassland</li> <li>Peacefulness, joy and delight</li> </ul>	'On balance these landscapes are not considered, either individually or collectively, to form land which meets the natural beauty criterion and they have therefore not been included within the Candidate Area.'  Natural England has reviewed this area in light of the consultation responses. Natural England notes that evidence submitted is similar to that which was previously submitted as part of the 'Call for Evidence'.  Natural England acknowledges that these areas of land form part of the South London Downs National Nature Reserve. However, Natural England does not conclude this interest results in a tract of land which meets the Natural Beauty Criterion. In particular, Natural England considers that Kenley Aerodrome does not meet the natural beauty criterion given its land use and relatively flat topography which results in lower scenic qualities and condition. As a result, the areas of Dollyper's Hill and Kenley Common
	<ul> <li>Part of the South London Downs National Nature Reserve</li> <li>Outstanding open views</li> </ul>	are physically fragmented from the areas of qualifying land associated with Happy Valley. Coulsdon Common is regarded as having a high natural beauty, given its

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
	<ul> <li>Contiguous with proposed extension</li> <li>Woodland mitigates views out towards adjacent urban areas</li> <li>Coulsdon Common comprises veteran trees – oaks and beech</li> <li>Green corridor of woodland on steep slopes between Dollyper's Hill and Coulsdon Manor golf course</li> <li>Outstanding open views.</li> </ul>	concentration of veteran trees and intact wooded character; however, it is relatively small in extent, adjacent to urban areas and bisected by the B2030.  Natural England does not agree with respondent <b>ANON-VUXE-WSKR-F</b> that the eastern boundary of Happy Valley does not have a distinct boundary. As noted above Natural England has reviewed the eastern boundary to ensure it more consistently aligns with the break in slope of the valley. These refinements place the boundary further to the west, again leaving Coulsdon Common, and other areas further east, isolated from the wider tract of qualifying land.
	<ul> <li>Further work of Capital Downs Living Landscape nature recovery strategy</li> <li>Further the implementation of the AllLondon Green Grid</li> <li>Will bring better connectivity and protection</li> <li>Education for children</li> <li>Starting point for those visiting Happy Valley</li> <li>Ensures ongoing protection to habitats</li> <li>South London Downs National Nature Reserve designation shares all the factors relating to natural beauty – to designate only part of the National Nature Reserve as AONB creates a split in administration and complicates decision making</li> <li>These are 'threshold landscapes' – preludes to the AONB.</li> </ul>	On balance therefore, Natural England does not consider these areas of land to meet the Natural Beauty Criterion overall and, although Natural England acknowledges that these areas of land have qualities which are highly valued by local residents, it regards higher quality areas to be fragmented.  Conclusion  Minor deletion to ensure boundary is more consistently aligned with the break in slope of the valley, west of Coulston Common.  (Deletion 5 – Refer to Figure 21a)
	Boundary: A variety of boundary options were implied based on whether respondents wished to see just Coulsdon Common included or a wider area	

Boundary		
Theme	Representation	Natural England Commentary
	extending to Kenley Aerodrome and Kenley Common, or wider still to include Dollypers Hill.  ANON-VUXE-WSKR-F (London Borough of Croydon), noted that the eastern boundary of Happy Valley does not have a distinct boundary so it would easily flow into these additional candidate areas.	
Include Riddlesdown Common, Ansley Berry Shaw and Warlingham Court Farm	ANON-VUXE-WEKR-F (London Borough of Croydon), ANON-VUXE-WEU9-J, ANON-VUXE-WEEN-Q, ANON-VUXE-WEGG-J, ANON-VUXE-WMG3-6  Reasons given included:  Natural Beauty:	Commentary  Natural England considered this area as part of EA8b in the Natural Beauty Assessment Report.  It concluded on pages 117 that 'The fragments of semi natural greenspace where there is wood pasture and chalk grassland are highly valued in the context of South London. However, these landscapes comprise relatively small pockets, fragmented by an urban context and physically separated from the wider AONB by Caterham and Chaldon.  On balance these landscapes are not considered, either individually or collectively, to form land which meets the natural beauty criterion and they have therefore not been included within the Candidate Area.'  Natural England has reviewed this area in light of the consultation responses. Natural England notes that evidence submitted is similar to that which was previously submitted as part of the 'Call for Evidence'. Natural England also notes that the dramatic downland slopes of Riddlesdown and south of Warlingham Court form an important setting to adjacent urban areas and form important areas of open natural greenspace for local communities, valued for their calcareous grassland habitat. Nevertheless, for the same reasons given above, Natural England is of the view that these areas of land form fragmented parcels which, whilst expressing some qualities, overall do not form part of the wider tract of qualifying land.

Boundary		
<u>Theme</u>	Representation	Natural England Commentary
	<ul> <li>Inclusion would assist partnership working</li> <li>Managing nature – bigger, better connected and better protected.</li> </ul>	Natural England does not consider it appropriate to apply wash over in these circumstances. The areas which would require wash over to join Riddlesdown Common to the wider tract of qualifying land would be much greater than just the A22.  Natural England is of the view that the AONB would be able to undertake collaborative work beyond its current or future boundary and to support initiatives to deliver nature recovery.  For these reasons Natural England remains of the view that they should be excluded from the proposed boundary extensions.  Conclusion No change.