

South Downs National Park Public Inquiry

Part 2: Boundaries

Opening Statement

by



January 2004

Biography

I am Thomas Peter Robin Crane, Chairman of the South Downs Campaign since its formation on 15 May 1990.

I am a retired film producer, director and writer whose work, in the context of this inquiry, included environmentally orientated programmes for the BBC Natural History Unit, The National Trust, RSPB, British Petroleum and British Waterways.

I have been a trustee of the Sussex Wildlife Trust since 1967. I have been closely involved in the Trust's development from the time when it had one member of staff and a few nature reserves to an organisation with some 35 staff and a turnover of £1.5M in 2002. The Trust now owns and/or manages 36 nature reserves in Sussex (3,420 acres). It has a thriving education department and also established and manages the Sussex Biodiversity Record Centre.

I was chairman of the Sussex Wildlife Trust from 1987-1993.

From 1994 to 1999 I was chairman of the Royal Society for Nature Conservation and national chairman of UK's 46 Wildlife Trusts.

I was a member of The Countryside Agency's South Downs Governance Technical Advisory panel during the National Park consultation process.

I am a Fellow of the Royal Entomological Society.

In 1999 I was appointed CBE for services to nature conservation.

Introduction

1. The South Downs Campaign (SDC) is one of the major players in the Public Inquiry. Our representatives will be making frequent appearances throughout the sessions on the boundary. We therefore believe it would helpful for us to make a full introductory statement explaining who we are and how and why we are making a series of objections.
2. We will also wish to have a significant input into the question of the administration later on.

The South Downs Campaign

3. The SDC is a network of some 80 very varied, mostly non-statutory, national, regional and local organisations¹, which fully support the principle of a South Downs National Park. Nearly all the national bodies concerned with conservation and recreation in the countryside are represented. We have on our Executive and as advisors a remarkably knowledgeable and expert team covering many disciplines².
4. At our heart we have the Council for National Parks (CNP), a charity that works to protect and enhance National Parks. CNP has unparalleled knowledge of the purposes and operations of our current National Parks. We believe that their expertise, together with that of other national bodies, combined with our very detailed knowledge of the area provides the SDC with a very strong position from which to comment on the subject of this Inquiry.
5. Within the SDC there has been a remarkable unanimity, despite the wide spectrum of interests represented. However, it has always been accepted that each organisation is entitled to express its own opinion and that it would be extraordinary if so many diverse groups agreed on the same detailed solution to every issue.

History of the South Downs National Park Campaign

6. We would like to emphasise that campaigning for a South Downs National Park began as far back as 1929³, followed in 1934 by East Sussex County Council's sponsoring of the South Downs Preservation Bill. This would have effectively protected large areas of remote downland from future development and would have laid the foundation stones for a National Park. Unfortunately, the Bill was defeated on the grounds that the 1932 Town and Country Planning Act would suffice to protect the countryside.

Founding of the South Downs Campaign

7. The South Downs Campaign was formed in 1990 by Sussex Wildlife Trust, CPRE, Sussex Rural Community Council, Sussex Archaeological Society, Society of Sussex Downsmen, the Council for National Parks and two individuals acting as advisors.

¹ The SDC's full membership is set out in Inquiry Document No: 3275/1/3, Annex 1

² See Annex 1 to this Opening Statement – Inquiry Document No: 3275/12/2

8. The SDC was initiated because, at that time, the future of the South Downs was being considered as part of the Edwards review of National Parks and we felt that National Park status offered the best long term solution to the conservation needs of the area.
9. In 1990 a special meeting of the Sussex Downs AONB Forum was held to discuss the future of the South Downs. The SDC's efforts to debate its National Park proposals at that meeting were thwarted when the Countryside Commission tabled a letter, which effectively delivered a *fait accompli* in favour of a Conservation Board. This Board was formed in 1992 as an experiment for six years, with a firm promise that the Board and the Countryside Commission would consider proposals for a National Park during that time. This promise was never fulfilled. The Sussex Downs AONB Forum was also disbanded.

The Countryside Commission's 1998 report 'Protecting our Finest Countryside'

10. After the 1997 General Election the Environment Minister asked the Countryside Commission to consider how the South Downs might be managed in the future. The Commission conducted a public consultation and then published its report *Protecting Our Finest Countryside: Advice to Government*³. An analysis of the consultation responses revealed that over 63% of the public supported a National Park option for the South Downs⁴.
11. It is well known that the Commission's report stated that the South Downs did not meet National Park criteria, because the area no longer had sufficient extensive tracts of open country and even more land was under the plough than in the 1950s. However, the Countryside Commission did not conduct a thorough survey of the area's qualities before coming to its conclusions.
12. We believe that this report was seriously flawed. It did not properly assess the South Downs against the statutory criteria nor did it provide an adequate solution to the conservation and future management of the area. The proposed Conservation Board would have no planning powers, its funding would be insecure, it would not be able manage long-term projects and it would have no statutory powers to raise funds or to acquire land. In addition, there had been only a short perfunctory public consultation.

South Downs Campaign's submissions to the Department of the Environment 1998/1999

13. We wrote critiques of the Countryside Commission's report⁵ and presented our case to the Department of the Environment over the next eight months through correspondence and meetings with ministers and civil servants⁶.

³ Protecting our Finest Countryside: Advice to Government, Countryside Commission, 1998 (CCP 532), page 31 – Inquiry Document No: CD 047

⁴ Annex 6, SDC 'In Principle' Support Paper - Public Support for a South Downs National Park, para 6.3.1 – Inquiry Document No: 3275/3/3

⁵ Annex 1, SDC 'In Principle' Support Paper - Public Support for a South Downs National Park – Inquiry Document No: 3275/3/3

Annex 1, Appendix A - Assessment of the Open Country Characteristics of the South Downs by Dave Bangs (October 1998) – Inquiry Document No: 3275/3/3

Annex 1, Appendix B – Letter from SDC Chairman to Rt Hon Michael Meacher MP with critique of Countryside Commission's advice to Government (July 1998) – Inquiry Document No: 3275/3/3

14. It has been suggested that the Labour Government pressed for National Park status for the South Downs without public consultation and for purely political reasons. Apart from the public consultation in 1998, there has probably been more public discussion on the future of the South Downs than for any of the other National Park. We submit that our logical and carefully reasoned representations and research actually played a helpful part in the considerations of Ministers who asked the newly formed Countryside Agency to look again at the case for a National Park in the South Downs.

National Park Designation Process

15. When the Countryside Agency began consultations on the designated South Downs National Park in April 2000, this was the first time that there had been a thorough appraisal of the recreational value of the South Downs. It was also the first thorough review of the natural beauty of the area since the 1960s. In our opinion the Countryside Agency has produced overwhelming evidence to demonstrate that the designated area meets the criteria for a National Park.

Co-operation with the Countryside Agency

16. The SDC engaged with the Countryside Agency at an early stage in the process. We also had representatives on various technical advisory panels set up by the Agency to give feedback and advice on the options and proposals regarding the running of the National Park Authority.

Public Support for National Park

17. Throughout this period the South Downs Campaign's case for National Park status has received the overwhelming support of the public despite the unsubstantiated claims of some objectors to the contrary⁷.

The Countryside Agency's boundary

18. The SDC strongly supports the Countryside Agency's approach to setting the boundary, particularly its principle of including virtually the whole of the two AONBs, but not exclusively so. We welcome the Agency's decisions, following the submission of additional evidence, to include areas such as Woolmer Forest, land at West Tisted, Ditchling and Coney Hill/Green Ridge at Brighton. However we are convinced that the Agency has been over-cautious in some places and we also have fresh evidence to present in a number of areas.
19. Landscape assessment is inevitably, in part, subjective and some decisions as to whether or not to include land within the National Park will be very finely balanced. We strongly suggest that where there is such doubt, land should be included, so that it can

⁶ Annex 2, SDC Biography – Inquiry Document No: 3275/1/3

⁷ Annex 6, SDC 'In Principle' Support Paper - Public Support for a South Downs National Park – Inquiry Document No: 3275/3/3

enjoy the enhanced protection and management that only a National Park can bring. It is notoriously difficult to alter a National Park boundary once it has been established⁸.

Underlying principles

20. We believe an overview of the principles that have led to our objections would be helpful as well as the methodology we have employed. In order to understand our approach it is first necessary to set out our perception of the South Downs National Park.

Qualitative Data

21. In the view of many, the South Downs is the most iconic of lowland English landscapes, symbolising England for residents and visitors alike. The hills that form its rippling backbone are the best loved of all chalkland landscapes. We suggest that few other regions of England have same emotional pull, nationally, as the South Downs.
22. It is not possible to understand why this is by simply looking at quantitative data. It is the quality and relative remoteness of landscape, the wildlife, cultural heritage and recreational experience that distinguishes the South Downs and the western Low Weald from other lowland landscapes.
23. We recognise that quality is subjective. We have therefore commissioned papers to back up this opening statement:
- Geology and Biodiversity in the designated National Park⁹;
 - The Specialness of the Proposed South Downs National Park – Dr Peter Brandon will expand on this paper later¹⁰;
 - A paper on the superior recreational qualities of the area. This will be tabled shortly.
24. In preparing these proofs we have received contributions from two of the most distinguished living experts in their fields: Dr Peter Brandon, whose knowledge of the history and cultural heritage of the South Downs and Weald is widely revered, and Dr Francis Rose, who is acknowledged as Europe's most knowledgeable botanist.
25. Our proof on Geology and Biodiversity has been written for four reasons:
- To dispel any doubts people might have about the justification of National Park status;
 - To emphasise how important it is that no area of value that contributes to this supreme national asset is omitted from the National Park;

⁸ See Recommendation 20, Defra Review of English National Park Authorities, 2002 – Inquiry Document No: CD 009

⁹ Geology & Biodiversity in the designated National Park – Inquiry Document No: 3275/13/1

¹⁰ Annex 2, SDC 'In Principle' Support Paper - Public Support for a South Downs National Park – Inquiry Document No: 3275/3/3

- To demonstrate the great contribution that natural heritage makes to the recreational experience of the visitors;
 - To highlight the historic importance of the South Downs and the Low Weald in the history of natural science and literature.
26. Our paper summarises the quite exceptional geological and wildlife importance of the area, both nationally and internationally. It happens that both the Chalklands and the Heathlands are high priority habitats on a European scale.
27. One hesitates to make comparisons with other places, but the point that is made time and again is that here there is an outstanding variety of wildlife and scenery within a remarkably small area. The distinguished editors of the New Naturalist series, James Fisher, John Gilmour, Sir Julian Huxley and Sir Dudley Stamp, opened their preface to “The Weald” with: *“It would be difficult to find anywhere in the world an area of comparable size which exhibits so perfectly the responses of plant, animal and human life to the stimuli of varied physical environments as the Weald, which Londoners have on their doorstep.”*

Recreational opportunity

28. In our paper soon to be submitted to the Inquiry on recreation we have explained why the South Downs offer such a superior recreational experience.
29. The South Downs are an accessible landscape. Between them, the Sussex and Hampshire AONBs have 2,745 km of rights of way, including national trails, recreational routes and parts of the National Cycle Network. There are also areas with open access and many permissive paths. The network spreads through downland, Weald and river valleys offering a variety of high quality views, landscapes and natural history for the enjoyment and education of those who go there. The scale and relative remoteness of these varied, but linked landscapes, provides a context within which it is possible to ‘escape’ from the crowded south-east.
30. An indicator of the importance that is placed on the recreational value of the South Downs can be seen by the fact that the Rambler’s Association and the Society of Sussex Downsmen have, over the last 3 years, organised over 4000 of walks in the designated South Downs National Park area.

Landscape Character Areas

The Chalk

31. Chalk downland is regarded as quintessentially English. Uncommon outside southern Britain and northern France, it is a defining landscape. But none of the existing National Parks contain chalk within their boundaries.
32. The landforms of the South Downs are as distinctive as their geology. The seemingly uniform Chalk rock has evolved into a rich scenic variety. The South Downs includes the most geologically interesting area of Chalk in Britain, with key exposures and a

splendid array of classic and distinctive landforms. They are much visited by geologists, geomorphologists and geographers for purposes of scientific study. The South Downs are a major geological resource, encouraging a greater awareness of the evolution of both the natural and human landscape.

33. The steep, northward-facing scarp slope contrasts with the gently inclined, southward-facing dip slope. There is an extensive network of streamless valleys. The steep-sided, deep-cut, scarp face valleys are of great interest, such as the celebrated Devil's Dyke near Brighton and the equally spectacular, but less well known, Rake Bottom on the west side of Butser Hill.

Chalk grasslands

34. A greater variety of plants are found on chalk than on other soils, while many downland plants are specialists that only survive on soil with a high concentration of lime. The chalk downs are therefore of considerable interest to the botanist. Likewise, there are insects and other creatures that are wholly dependent upon the chalkland plants.
35. Despite the substantial loss of the old "unimproved" chalk turf, there is still a wonderful array of wild flowers and insects that still linger on footpaths and bridleways and add to the pleasure of the huge number of South Downs visitors.

Chalk woodlands

36. We have drawn attention to the very high quality of the ancient woodlands to be found on the western end of the Sussex Downs and on the Hangers in Hampshire. We have highlighted the other contrasting woods of the dip slope – The coppiced woods at West Dean which attract a great deal of public interest and another much visited woodland on a grander scale; the Yew woods and other chalk habitats of Kingley Vale.
37. **We therefore believe that all of the Chalk that retains its natural beauty and contributes to the wider landscape should be within the National Park boundary. That is the reason for our objections to the exclusion of pockets of chalk around Brighton Urban Fringe, east of Glynde, land to west and north of Rowlands Castle and the ancient settlement and associated downland at Catherington.**

The coastline

38. A very special feature of the South Downs is the omnipresent sea. East of Brighton the Chalk reaches the coast and forms magnificent sea cliffs and wave-cut platforms. Seaford Head, the Seven Sisters and Beachy Head form one of the finest stretches of coast anywhere in Britain. They form one of the key features of the designated National Park and are of international renown.
39. Whilst we acknowledge that within the terms of the 1949 Act it is not possible to extend the National Park boundary beyond the mean low water mark, we will be bringing evidence to the Inquiry on the rich wildlife, historical, recreational and landscape values of the marine environment. We hope to persuade you that at the very least the National Park should have an open marine boundary, like those at the Exmoor and the North

Yorkshire Moors National Parks, to coincide, at least, with the Voluntary Marine Conservation Area along the Heritage Coast.

40. Another section of marine cliff landform exposure, much studied by experts and admired by the ordinary public, is the stretch from Brighton to Newhaven which is both of a considerable scientific interest and high amenity / leisure value. It is designated a Geological Conservation Review Site in addition to its SSSI status, a testament to its national importance for education and research in earth sciences.
- 41. We therefore believe that all the cliffs from Brighton eastwards should be included in the National Park both for their visual and conservation interest and are therefore objecting to their exclusion. We will also be pressing for an open marine boundary.**

The Low Weald

The SDC profoundly agrees with the notion that the South Downs National Park should extend beyond the chalk, for four reasons:

- The western end of the Low Weald contains areas of exceptional natural beauty;
 - Visually, the South Downs are linked to the Low Weald;
 - The landscape and cultural history of the South Downs is inextricably linked to that of the Low Weald;
 - The high recreational value of the Low Weald.
42. It is notable that the main open-air museum in area that concentrates on rural matters is called The Weald and Downland Museum and has interpretative material on the linkages between the two areas. We are pleased that Countryside Agency share the SDC's view and have included a large tract of the western Low Weald in the designated boundary.

The Weald – definition

43. We believe the use of the title “The Weald” needs clarification. Its use has changed over time. Originally The Weald, “the Wild” or “Andredsweald”, was the Anglo-Saxon name for the predominantly heavy clay forest lands lying between the Chalk hills of the North and South Downs. In the New Naturalists book “The Weald” (Collins 1953) the authors included the whole geological spectrum from south of London to the sea. Today the Weald is normally regarded as the whole area within the chalk rim of the North and South Downs. The non-chalk area within the designated South Downs National Park is part of “the Low Weald”. The “High Weald” covers the area north of the eastern end of the designated South Downs National Park and is centred on Ashdown Forest.
44. Of course, no one would claim that the whole of the Weald has linkages to the South Downs nor that it has retained its natural beauty throughout. But the western Low Weald is a key element of the beauty of this part of England. The dramatic scarps of chalk hills give borrowed landscape to the Weald. The relatively undeveloped and

characteristic undulating landscape of the Weald provides stunning views from the top of the scarp slopes, as can be seen at Harting Down. This linkage was recognised in the AONB designation. It is summed up in the 1968 study on the East Hampshire AONB: “*It is the exquisite arrangement and combination of the whole that gives the AONB its beauty. This is particularly true of the partly enclosed farmland...and the Wealden landscapes. Here it is not one single element that provides the intrinsic landscape, but the composition as a whole.*”¹¹

Heathland

45. One of the dominant features of the western Low Weald is the fragmented, but substantial area of lowland heaths of international importance. Despite the loss of 95% of heathland in Europe in the past 150 years, southern England contains the largest and highest quality tracts. Woolmer Forest is the second largest area in Hampshire and the largest on Folkstone beds of Lower Greensand. Francis Rose regards it, with Thursley Common in Surrey, as second only in Europe to the New Forest in quality. It is internationally important for birdlife and the only place in Britain where all 12 native amphibian and reptile species are found. Despite being an Army training area, it provides a high quality recreational environment and the SDC strongly supports the inclusion of such an internationally important area.
46. Although Woolmer is exceptional, there are a number of other high value areas of heathland in the West Sussex which are being actively managed to retain their character and are used extensively by the public for recreation.

The Upper Greensand Hangers

47. The complex geology of the Upper Greensand gives rise to a wide variety of soil types, both calcareous and acid. This in turn produces a rich flora of native tree species, flowers and mosses. Much of the scarp of the Upper Greensand in East Hampshire is very steep due to the hard beds of Malmstone and is occupied by a unique linear woodland. In the view of Dr Francis Rose, the best of these Hangers, near Selborne, Wick Hill Hanger, Long Copse and Milking Hanger, are of international importance in their own right.

West Sussex woodlands

48. We have also drawn attention to the magnificent ancient woodlands in West Sussex, particularly Sussex Wildlife Trust’s The Mens and Ebernoe Common. Ebernoe Common is a wood pasture, renowned for its superb plants and lichens and it is also one of very best habitats for bats in the United Kingdom. These bats feed amongst the well-wooded streamsides, meadows and hedges of the Kirdford and Plaistow area.
49. This is one of the least spoilt areas of the Low Weald and has a number of fragments of SSSI and SNCI woodlands which the Sussex Wildlife Trust is planning with other agencies to link up into a large area of near-natural forest. As the first step in this process the Trust acquired 80 hectares of Butcherland Farm in 2001. This land

¹¹ A study in Countryside Conservation. Hampshire County Council, Nature Conservancy, Ministry of Agriculture and the Forestry Commission 1968

immediately abuts its Ebernoe Common nature reserve and is being managed with the intention of extending the wood pasture as much as possible by natural processes. The designated boundary cuts through this important area.

50. The SDC believes that the Kirdford Plaistow area, which lies on the Wealden clay and Paludina limestone of the lower Greensand, is a most important and attractive part of the undeveloped western Low Weald, displaying the classic features of this landscape of small-scale fields interspersed with copses. It contains attractive villages and has unifying links with the South Downs. **The SDC therefore supports the case for the area around Kirdford and Plaistow being included in the National Park.**

River Valleys and coastal plain

51. The SDC is pleased that the whole catchment of the River Rother, including Woolmer Forest, is within the designated boundary. This is a remarkably unspoilt river. The River Itchen is one of the finest rivers in Europe and it is inconceivable that those sections within the designated National Park boundary should be excluded.
52. The SDC regards the valleys of the main rivers that slice through the Downs to the English Channel as an important part of this tract of quintessentially English landscape. They do not fragment the landscape; they are an inextricable part of it. Each of these rivers has its own special characteristics.
53. It is no accident that the towns of Lewes and Arundel are sited respectively on the Rivers Ouse and Arun. The South Downs also flow into these splendid historic towns, both of which are an integral part of their surroundings.
54. The SDC is pleased that Arun valley, to the north of Arundel and parts of the Adur and the Ouse valleys have been included. **The SDC supports the inclusion of Lewes and Arundel, but objects to the boundary in the Adur, Ouse and Cuckmere valleys. In the view of SDC, the boundary should be extended north to include more of their valuable floodplains and associated areas.**
55. To the south, the coastal plain and river estuaries feature in views from the Downs. Some areas that have strong cultural links to the South Downs dating back to before Saxon times, have high landscape value. We believe these should be included and are the **reason for objections to the exclusion of land to the south of Arundel, Tide Mills and land to the west of Chichester.**

The Overall Context

56. Dr Peter Brandon to cover:
- Iconic nature of landscape;
 - Its celebration by painters, writers, poets, etc;
 - Why it is different from other similar landscapes;
 - Linkages between the South Downs and the Low Weald.

Boundary Changes - Methodology

57. The South Down Campaign has taken a great deal of care in putting together its boundary evidence.¹² We have drawn on the considerable expertise of our membership to decide which objections should be put to this Inquiry.
58. The Boundary Group set up to refine the areas of objection, contained representatives of the CPRE, Ramblers' Association, Youth Hostels Association (YHA) and Society of Sussex Downsmen. Three of its members sit on either the Sussex Downs Conservation Board or the East Hampshire AONB JAC. The Group logged 66 days in the field performing this specific task. We emphasise this point because we do not believe that desk bound studies on their own can ever provide a true assessment of a landscape. Our considerations were guided by a professionally qualified landscape assessor employed at the time by CNP.
59. We will be bringing our evidence to the Inquiry in a number of ways. In some cases the SDC will present its own evidence. In some cases constituent groups will give evidence with the full backing of the Campaign and in others the SDC or constituent members will support local groups or Parish Councils.

Conclusion

60. This Inquiry is hearing evidence on the designation of a National Park in the 21st century. Clearly, we have to take 21st century values into account. That is why we believe that it is not only important to consider the statutory criteria of natural beauty and recreational opportunity, but also availability to all. The proximity of the South Downs to urban centres, the strong network of rail and public transport routes, both within and to the area, makes it available to a large number of people in the region, especially the residents of our capital city. This easy, low-cost accessibility is a crucial resource for the communities of the crowded south-east.
61. Increased numbers of visitors are likely to come to the South Downs as a result of changes in our culture rather than due to the fact of designation. We believe that a National Park Authority is the best instrument for managing any problems that may arise. It would have the power and resources to balance the interests of recreation and conservation, having regard to the Sandford Principle.
62. We fully support the Countryside Agency in the thoroughly professional way they have approached the designation process and in particular commend the extent and depth of consultation undertaken.
63. We hope that it will become increasingly clear that we in turn bring to this Inquiry evidence which is the product of a highly professional team, that collectively has a wealth of talent and an extraordinary breadth of both local and national knowledge and experience. We have worked extremely hard to make certain that we only bring objections where we believe we have a very strong case.

¹² SDC Boundary Process Paper – Inquiry Document 3275/2/1

64. We are extremely grateful for the opportunity we have been given to make an opening statement. Our reasons for being here are purely altruistic. We are not concerned with power or politics. Our only aim is to seek the best possible protection and management of the South Downs, one of the finest but most vulnerable and threatened landscapes in Britain.