

South Downs Campaign

Deciding the Boundaries

1. Since its formation in 1990 the South Downs Campaign (SDC) has called for the establishment of a South Downs National Park including the two areas covered by the Sussex Downs Area of Outstanding Natural Beauty (AONB) and the East Hampshire AONB. Consequently, overall the SDC was very supportive of the Countryside Agency's proposals for a National Park, particularly when the Agency adopted the principle that the boundaries of the Park should be based on the two AONB areas, but not exclusively so.
2. The SDC has based its considerations throughout on the criteria set out in the National Parks and Access to the Countryside Act 1949, which states that:

5(2) The said areas are those extensive tracts of country in England and Wales as to which it appears to the commission that be reason of:-

- their natural beauty, and

- the opportunities they afford for open air recreation, having regard both to their character and to their position in relation to centres of population, it is especially desirable that the necessary measures shall be taken for purposes mentioned in the last foregoing subsection.

3. The South Downs are of outstanding natural beauty, as acknowledged by their designation as AONBs. They are also heavily used by the public for informal outdoor recreation, much of this related to their proximity to centres of population. For these reasons the SDC believes that both AONBs clearly meet the statutory criteria and should form the core of the South Downs National Park though it also considers that areas outside the AONBs also meet the criteria.
4. The SDC made its first detailed boundary submission to the Countryside Agency in June 2001 in response to the Countryside Agency's Area of Search, produced earlier that year. At that time the SDC proposed some 30 areas outside the two AONBs for inclusion within the National Park, some of which were excluded from the Area of Search. In making the case for these areas the SDC used the statutory criteria and the Countryside Agency's agreed approach for defining the precise boundary of a national park as justification, which the SDC fully supports.
5. As a result of further detailed work this submission was revised in the public consultation response submitted in February 2002. To counter the arguments made by some consultees that the National Park should be confined to the chalk only, a paper was included arguing that the area north of the chalk was of exceptional quality and fully justified its inclusion when considered against the criteria of the 1949 Act (see Appendix A¹). Subsequent to this and ahead of the 18 April 2002 Countryside Agency Board meeting, the SDC worked with others to provide fresh evidence,

¹ Annex 1 – The Area North of the Chalk by Robin Crane (February 2001) - Inquiry Document No: 3275/2/3

making the case for a number of omitted areas to be included. This resulted in the Countryside Agency deciding to visit several areas, which ultimately led to the Countryside Agency including Woolmer Forest, land near West Tisted, Ditchling and the Coney Hill/Green Ridge area of Brighton, within the proposed National Park.

6. In September 2002, the SDC established a boundary working group to examine in detail the various areas that the SDC had supported and to confirm which areas it would contest at the forthcoming public inquiry.
7. In order to do this, the SDC's boundary working group paid a series of site visits to the various areas under consideration, most of which were completed ahead of the SDC's conference in Chichester in January 2003. On these visits the proposed boundary was closely scrutinised using a detailed, evidence-based assessment of the qualities of such areas. Maps of most of the selected areas were presented at the conference, as were the reasons for choosing these areas and their boundaries. The work of the boundary working group was strongly endorsed by the conference, although further work in most areas was necessary to identify the exact boundary on the ground.
8. When the Designation Order was placed on deposit, the SDC objected to the boundary in 10 sections (Kirdford/Plaistow, Storrington area, Adur Valley, Lewes – Polegate, Tide Mills, Saltdean – Shoreham Urban Fringe, Arundel, North and west of Chichester, Rowlands Castle, Catherington) plus the marine area, but left its objections framed in such a way to allow it the time and flexibility to continue to consult with local people and member groups as to the best line on the ground to use their local knowledge to ensure a sensible and robust boundary.
9. The boundary working group continued to provide feedback to the SDC Executive on its work. At the SDC's 16 June 2003 Executive meeting, it was decided that the SDC would finalise its proposals at its 10 July 2003 and 3 October 2003 Executive meetings which were open for all members to attend and to take part in any boundary discussions. Subsequently, the decisions taken at these meetings and the proposed boundaries were presented to the SDC's conference/AGM on 18 October, 2003.
10. This brief history attempts to show how the SDC has undertaken a thorough review of its boundary proposals and has striven to be consistent in its approach to some very different areas of countryside.
11. The SDC has followed the statutory criteria and the Countryside Agency's agreed approach for defining the precise boundary of a national park in selecting the boundary variations it is proposing and has made its decisions in an open and democratic way, using the expertise of its members to inform its decision making process. Given the SDC's large and diverse membership² it is significant that there has been near unanimous support over the areas that the SDC should support for inclusion in the National Park.
12. Virtually all the areas on which the SDC takes issue with the Countryside Agency are in transitional landscapes where the drawing of a boundary inevitably involves a degree of judgement, as is acknowledged in the Countryside Agency's Position Paper

² SDC Biography – Inquiry Document No: 3275/1/1

2³. Where the SDC supports a wider boundary than that drawn by the Countryside Agency, it does so in the knowledge that in most cases further evidence is now available that leads to a different conclusion to that drawn by the Countryside Agency.

13. Some member organisations of the SDC will be bringing to the Inquiry their particular expertise on a few specific sections of the boundary. They will argue a case for inclusion of land on which the SDC is not necessarily submitting evidence, building on the approach taken by the SDC and the Countryside Agency. The SDC fully acknowledges that there may be merit in these proposals to extend the boundary beyond the line that the SDC is proposing.
14. The SDC hopes that this clarification of how its views on the National Park boundary have decided upon is of help to the Inquiry.

³ Position Paper 2 - The South Downs National Park Boundary, Countryside Agency, July 2003, para 44 – Inquiry Document No: CD 070