

South Downs National Park Public Inquiry

Part 2: Boundaries

A Clearer Boundary: Shoreham - Falmer *(Section P, Maps 32-34)*

Proof of Evidence

by



November 2003

1 Introduction

- 1.1 The South Downs Campaign (SDC) submits the following proof of evidence for the boundary of the designated South Downs National Park within Section P, Maps 32-34 of the Countryside Agency designated boundary maps.
- 1.2 The SDC is a network of organisations working for the best possible South Downs National Park, representing over 80 national, regional and local groups and organisations¹.
- 1.3 This proof of evidence is part of a series of submissions to the Public Inquiry by the SDC and should be read in the context of the SDC's written proofs of evidence 'SDC 'In Principle' Support for the South Downs National Park'² and 'SDC Boundary Process'³. Proofs of evidence on specific areas around the Brighton & Hove urban fringe⁴ are also relevant.

2 Detailed Boundary - Section P, Maps 32-34: A Clearer Urban Boundary: Shoreham - Falmer

2.1 Description of the Area and its Boundary

- 2.1.1 The SDC is concerned that the current National Park boundary around Brighton & Hove is confusing. The boundary generally lies to the north of the A27 trunk road. However where it follows physical features these are often neither prominent nor easily distinguishable in the wider landscape. The SDC considers that generally a more easily distinguishable and hence understandable boundary would be the northern edge of the A27.
- 2.1.2 The SDC is not suggesting that the National Park boundary should be confined in all cases to the north of the A27, as that would be too simplistic an approach and exclude areas that meet the criteria. Instead the SDC is recommending that the boundary should be taken down to the road, when the road is the most distinguishable feature on the ground.
- 2.1.3 In this area the boundary weaves up and down cuttings and embankments, skirting some small developments adjacent to the A27 (such as at Mile Oak⁵) which the SDC considers are inconsequential in the overall landscape. This is of concern to the SDC as it not only excludes land currently designated as part of the Sussex Downs Area of Outstanding Natural Beauty (AONB) but may make the boundary difficult to determine in the long term, as is the case with parts of the AONB boundary, for

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

² SDC 'In Principle' Support for the South Downs National Park – Inquiry Document No: 3275/2/1

³ SDC Boundary Process – Inquiry Document No: 3275/3/1

⁴ SDC Boundary Written Representation: Southwick Tunnel – Inquiry Document No: WR 3275/1a

SDC Boundary Written Representation: Mile Oak - North of the A27 – Inquiry Document No: WR 3275/2a

SDC Boundary Proof of Evidence: Land North and North-East of Foredown Tower – Inquiry Document No: 3275/5/1

SDC Boundary Written Representation: Hillside north of Green Ridge – Inquiry Document No: WR 3275/3a

⁵ See SDC Boundary Written Representation: Mile Oak - North of the A27 – Inquiry Document No: WR 3275/2a

example around Eastbourne. Concerns raised by the SDC with regard to Mile Oak⁶ are also relevant.

2.1.4 Starting in the west at Shoreham at Grid Reference (GR) TQ 211 065 the SDC is proposing that the boundary should run alongside the northern side of the A27 carriageway until GR TQ 341 085 in those places where the A27 is in effect the most easily distinguishable boundary. This does not mean that Southwick Hill, land west of Foredown Tower, Coney Hill / Green Ridge, or any other areas which lie south of the bypass and warrant inclusion within the National Park should be excluded. In these cases the SDC is not suggesting the A27 should be taken as the boundary and so this proposal does not affect them. This boundary described above is shown on the maps in Appendix A⁷.

2.2 Justification Against Criteria – Natural Beauty

2.2.1 Virtually all the land in question is designated as part of the Sussex Downs Area of Outstanding Natural Beauty (AONB). Although it has obviously been impacted upon by the construction of the A27 bypass, it is still an important part of the landscape of the South Downs.

2.2.2 In most instances the road cuttings blend into the rolling view of the downland landscape and will be assumed to be part of the National Park by the many people who will view them from, or across, the A27 looking north.

2.2.3 Equally, people on the Downs looking south will assume the National Park goes right up to the road (and sometimes beyond) and does not stop short at the foot, or top, of an embankment. A good example of where this will happen is the excluded embankment on the north side of the A27, north of Foredown Tower and south of New Barn at GR TQ 257 075. The designated boundary runs along the foot of this north-facing embankment despite the fact that its gradient has been sympathetically engineered so that it blends into its surroundings and appears part of the wider downland⁸. The embankment carries the eye across the A27 to Foredown Tower⁹, an important gateway to the National Park.

2.2.4 Many of the verges have been planted with a sympathetic seed mix while in other parts, natural regeneration has been allowed to occur. Some of the areas are good quality chalk grassland. This has created a local sense of place, managed in a sensitive way as part of the AONB, another reason why the embankments and cuttings are often read as part of the wider landscape. The sides of the embankments and cuttings are also often important for wildlife and help provide a wildlife corridor along the length of the road. For example, part of the Shoreham bypass embankment on the northern

⁶ SDC Boundary Written Representation: Mile Oak - North of the A27, paragraph 2.4.2 – Inquiry Document No: WR 3275/2a

⁷ Appendix A – Inquiry Document No: 3275/4/2

⁸ see Photos 1 & 2, Appendix B – Inquiry Document No: 3275/4/2

⁹ see Photo 2, Appendix B, SDC Boundary Proof of Evidence: Land North and North-East of Foredown Tower – Inquiry Document No: 3275/5/2

side of the A27 is one of the best sites on the South Downs for the Small Blue butterfly¹⁰.

2.2.5 The Countryside Agency has given very little detail as to why these embankments have been excluded from the National Park. The reasons given simply state: *“Boundary adjusted to exclude the embankments and cuttings along the A27 which do not meet the designation criteria.”*¹¹

2.2.6 However, the SDC considers that proximity to the A27 cannot necessarily have been a reason for these areas’ exclusion as the designated boundary comes right up to, or very close to, the road in many other instances. Given their natural beauty in landscape and wildlife terms, the SDC suggests that these areas be reassessed against the criteria.

2.3 Justification Against Criteria – Opportunities For Open-Air Recreation

2.3.1 The constant weaving of the designated boundary up and down embankments and around small areas excluded from the National Park, severs nationally and regionally important and well used rights of way. The SDC considers that this creates unnecessary confusion. Some examples of split rights of way include:

- The Monarch’s Way and Sussex Border Path at Southwick Tunnel¹²;
- The Monarch’s Way at Mile Oak¹³;
- Bridleway at Foredown Tower¹⁴;
- Footpath crossing the A27 at Coney Hill/Green Ridge¹⁵;
- Sussex Border Path as it crosses the A23;
- Sussex Border Path alongside the A27 just east of Braepool (south of Ewebottom Hill);
- Bridleway on north side of the A27 between Ewebottom Hill and Ditchling Road has one large (over 1.5km) and one small section (400m) excluded from the National Park. However, it is difficult to tell from Map 33 exactly where the boundary lies and it could be that the whole bridleway, along this section, is excluded.

2.3.2 The SDC considers that this could complicate the management of these important rights of way around Brighton & Hove. The Countryside Agency has proposed that the Local Highways Authorities should delegate rights of way to the National Park Authority. In these circumstances the omission of many small sections or rights of way from the National Park could cause confusion and additional bureaucracy.

¹⁰ Appendix C, Extract from Atlas of Sussex Butterflies – Inquiry Document No: 3275/4/2

¹¹ South Downs National Park: The boundary & the reasoning for it. (CA 133), page 20 – Inquiry Document No: CD 023

¹² SDC Boundary Written Representation: Southwick Tunnel – Inquiry Document No: WR 3275/1a

¹³ SDC Boundary Written Representation: Mile Oak - North of the A27 – Inquiry Document No: WR 3275/2a

¹⁴ SDC Boundary Proof of Evidence: Land North and North-East of Foredown Tower – Inquiry Document No: 3275/5/1

¹⁵ SDC Boundary Written Representation: Hillside north of Green Ridge – Inquiry Document No: WR 3275/3a

2.3.3 In addition, around the urban fringe, rights of way will need to be maintained to the highest standards to encourage people to access the wider South Downs by foot, horseback and cycle rather than to drive. This will be an important consideration for the National Park Authority for achieving National Park purposes, but could be undermined by confusion over responsibility for the rights of way network.

2.4 **Additional Considerations**

2.4.1 The Countryside Agency's own approach to defining a boundary talks of using "*an easily distinguishable physical boundary*"¹⁶. However while the designated boundary may follow a feature on the ground, the SDC would contest whether it was easily distinguishable. In such a highly confusing context the SDC believes that using the northern edge of the A27, where the road is in effect the boundary, would be the best option. It would also make it easier for the National Park Authority to achieve National Park purposes as it would have control over planning in this highly sensitive area.

2.4.2 The designated boundary has created many small 'islands' of land, north of the A27, separate from the Brighton and Hove urban area which currently lie within the Sussex Downs AONB. If they are not included within the National Park it is very likely, that as AONB remnants, they will lose this protection under the AONB Revocation Order to be considered at the public inquiry. This land would therefore be at higher risk of built development (such as from telecommunications masts) with a potentially detrimental effect on the landscape setting of the National Park.

3 **Recommendation**

3.1 The SDC considers that these areas meet the Countryside Agency's criteria and approach for defining National Park boundaries and requests that the Inspector recommends to the Secretary of State that the South Downs National Park boundary be made clearer between Shoreham and Falmer as described above.

¹⁶ A South Downs National Park: Public Consultation Report (CA 89) - November 2001, page 38, Table 1 - - Inquiry Document No: CD 031