

## South Downs National Park Public Inquiry

### Part 2: Boundaries

# **Toad's Hole Valley**

*(Section P, Map 33)*

## Proof of Evidence

*by*

## **Society of Sussex Downsmen**

*on behalf of*



November 2003

## **1. Introduction**

- 1.1 The South Downs Campaign (SDC) submits the following proof of evidence for the boundary of the proposed South Downs National Park within Section P, Map 33 of the Countryside Agency proposed 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 organisations<sup>1</sup>.
- 1.3 The Society of Sussex Downsmen was founded in 1923 with the object of preserving the beauty and amenities of the South Downs for the public benefit. It is a private company limited by guarantee (no. 319437) and a registered charity (no. 230329). It currently has some 2700 members.
- 1.4 This proof of evidence is part of a series of proofs of evidence to be submitted 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'<sup>2</sup> and 'SDC Boundary Process'<sup>3</sup>.

## **2 Detailed Boundary – Section P, Map 33: Toad's Hole Valley**

### **2.1 Description of the Area and its Boundary**

- 2.1.1 The boundary is described using regularly spaced Ordnance Survey six figure Grid References (GR) to assist with relating the written description of the boundary and coincides with the map in Appendix A<sup>4</sup>.
- 2.1.2 The area comprises 43 hectares. It is in the form of triangle bounded by Downland Drive and the Hangleton Estate to the south-west between GR TQ 274077 and GR TQ 279071, by King George VI Avenue to the south-east between GR TQ 279071 and GR TQ 285080. It is bounded on the north by the A27 Brighton bypass between GR TQ 285080 and GR TQ 274077. Also included is a tongue of land extending westwards from the north-west corner of the triangle at GR 274 077 to the bridge over the A27 bypass at GR TQ 270078.

### **2.2 Justification Against Criteria – Natural Beauty and Landscape Quality**

- 2.2.1 The whole of Toad's Hole Valley is at present within the Sussex Downs Area of Outstanding Natural Beauty (AONB) and thus nationally recognised as a high quality landscape meriting special protection.
- 2.2.2 Viewed from various points on the periphery of the area, Toad's Hole Valley is very much a part of the broad sweep of the Downland from the north, a perception which is not significantly damaged or interrupted by the A27 bypass or the traffic on it. It thus retains an integral relationship with the main dip slope of the Downs. The SDC

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<sup>1</sup> SDC Biography – Inquiry Document No: 3275/1/1

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

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

<sup>4</sup> Appendix A - Inquiry Document No: 3275/7/2

considers that the area is not in any way dominated visually either by the A27 or the built up area of Hangleton.

- 2.2.3 The steeply sloping south-west segment is a high quality Downland landscape consisting of rough grassland, scrub and woodland. The whole segment is designated on the Brighton and Hove Local Plan (BHLP) – second deposit draft 2001 as open countryside<sup>5</sup>, as a Site of Nature Conservation Interest<sup>6</sup> and as a proposed Local Nature Reserve<sup>7</sup>.
- 2.2.4 Land use of the larger north-eastern segment is in a state of transition. Recently taken out of use as agricultural land, it is now subject to unauthorised motorcycle use. However the SDC considers the area has considerable potential, if properly managed and restored as Downland and a public open space.
- 2.2.5 The tongue of land at the north-west corner is directly connected to the south-west segment and is a similar quality landscape with areas of denser scrub and woodland.
- 2.2.6 A species list resulting from a survey carried out on the south-western segment of the area, demonstrates the wide variety of fauna and flora to be found within the area<sup>8</sup>.
- 2.2.7 The high quality of this landscape was well summarised by the Inspector's report into the Hove Borough Local Plan Second Review:

*“4.26 From King George V Avenue, the broad horizons to the north and north west of Toad's Hole Valley are not seriously interrupted by the bypass or traffic moving upon it. From the north east beyond the bypass, on the road leading to Devil's Dyke, traffic moving upon the bypass rather than the bypass itself is visible: but these vehicle movements do not seriously affect the perception of Toad's Hole Valley as part of Downland. At closer range, especially from the higher ground of Downland Drive, the Valley is of sufficient size for its Downland character to be readily appreciated in its own right. In my view, therefore, the character of Toad's Hole Valley itself and its relationship with the wider Downland have not significantly changed by the construction of the bypass: it continues to make an important contribution to both the AONB and to the exceptionally fine setting of the town of Hove”<sup>9</sup>*

- 2.2.8 This statement in paragraph 2.2.7 above, confirmed by the SDC's own observations, is in sharp contrast to the Countryside Agency claims that the area does not meet the natural beauty criterion<sup>10</sup>.

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<sup>5</sup> Appendix B – Policy NC6 – Extract from Brighton & Hove Local Plan Second Deposit Draft (CD 096) - Inquiry Document No: 3275/7/2

<sup>6</sup> Appendix B – Policy NC4, site 12 – Extract from Brighton & Hove Local Plan Second Deposit Draft (CD 096) - Inquiry Document No: 3275/7/2

<sup>7</sup> Appendix B – Policy NC3 – Extract from Brighton & Hove Local Plan Second Deposit Draft (CD 096) - Inquiry Document No: 3275/7/2

<sup>8</sup> Appendix C – Inquiry Document No: 3275/7/2

<sup>9</sup> Appendix D – Inquiry Document No: 3275/7/2

<sup>10</sup> Position Paper 2 - The South Downs National Park Boundary, Countryside Agency, July 2003, Annex 4, No. 38 – Inquiry Document No: CD 070

### **2.3 Justification Against Criteria – Opportunities for Open-Air Recreation**

- 2.3.1 The south-west segment is accessible to the public from several points along Downland Drive and thus directly from the Hangleton Estate. Although access is at present on a de facto basis, the whole area has been included on the provisional map prepared under the Countryside and Rights of Way Act 2000 as an open access area. This designation is likely to be confirmed in the near future. The SDC considers that the Countryside Agency is therefore incorrect in stating that the area is not open to the public<sup>11</sup>.
- 2.3.2 Apart from the wildlife interest (see 2.2.3 above) this steeply sloping area is criss-crossed by well used paths, offering exceptional views across the valley.
- 2.3.3 The north-west tongue of the area provides a vital link to the greater Downland. It is contiguous with the south-west segment and is traversed by a bridleway which is visually well insulated from the bypass to the north and the built up area to the south. This bridleway leads directly to a bridge over the bypass, one of the most important recreational gateways into the Downland to the north, continuing along the track bed of the old Devil's Dyke railway. It is also part of a popular long distance path, the Monarch's Way, which runs alongside Toad's Hole Valley and offers excellent views over this area and the wider Downland.

### **3 Additional Consideration**

- 3.1 The whole of Toad's Hole Valley is at present within the Sussex Downs Area of Outstanding Natural Beauty and is thus recognised as a high quality landscape meriting protection. If it is not included within the National Park it is very likely, as an AONB remnant, to 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 with a potentially detrimental effect on the landscape setting of the National Park.

### **4 Recommendation**

- 4.1 The SDC considers that this area meets 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 boundary be amended to include Toad's Hole Valley in the South Downs National Park.

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<sup>11</sup> Position Paper 2 - The South Downs National Park Boundary, Countryside Agency, July 2003, Annex 4, No. 38 – Inquiry Document No: CD 070