

South Downs National Park Public Inquiry

Part 3: AONB Revocation Orders

AONB Revocation

Written Representation

by



July 2004

1 Introduction

- 1.1 The South Downs Campaign (SDC) submits the following written representation on the East Hampshire and Sussex Downs Areas of Outstanding Natural Beauty (AONB) Revocation Orders.
- 1.2 The SDC is a network of organisations working for the best possible South Downs National Park, representing over 90 national, regional and local groups and organisations¹.
- 1.3 This written representation 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 proofs of evidence 'SDC Boundary Process'² and 'SDC 'In Principle' Support for the South Downs National Park'³ plus a number of boundary proofs of evidence which relate to areas which are outside the designated National Park but are currently within the Sussex Downs AONB⁴.
- 1.4 The SDC has already made a strong case in several submissions to the inquiry as to why the National Park should include the western Weald and Hampshire Hangers⁵ as well as the Chalk Downs. The SDC has also argued in a number of proofs that the boundary of the National Park should be expanded to include further areas that meet the criteria. It hopes that the inspector will be persuaded by the strength of these arguments to include a wider rather than a smaller area.

2 Principle of Revoking the AONB

- 2.1 The SDC fully supports the principle of a South Downs National Park and has submitted much evidence to show how it meets the statutory criteria and why it is especially desirable. The SDC also understands the reasoning behind the Revocation Orders.
- 2.2 The SDC would not object in principle to the revocation of both the East Hampshire and Sussex Downs AONBs upon the establishment of a South Downs National Park, should the area covered by the National Park include the whole of the two AONBs. The only acceptable exceptions to the SDC's position is the exclusion of a number of minor areas of AONB which no longer meet the natural beauty criteria or where the exclusion is necessitated by changes in circumstances, or where the AONB boundary is unclear on the ground. The 71 exclusions, the majority of which the SDC has not objected to, are all listed in the Countryside Agency's Position Paper 4⁶.

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

² SDC Boundary Process – Inquiry Document No. 3275/2/1

³ SDC 'In Principle' Support for the South Downs National Park – Inquiry Document No. 3275/3/1

⁴ See Appendix A for list of SDC boundary proofs of evidence relating to areas of AONB currently outside the designated National Park – (attached to this document)

⁵ See the following submissions which specifically make the case for including both Weald and downland in the South Downs National Park – Inquiry Document Nos: 3275/3/1, 3275/13/1, WR 3275 10a & WR 3275 11a

⁶ Annex 1, Position Paper 4 - The revocation of the Sussex Downs AONB and the East Hampshire AONB, Countryside Agency, 2003 – Inquiry Document No: CD 72

2.3 As noted in paragraph 1.3 above the SDC has already made representations on a number of boundary areas, particularly around the Shoreham to Falmer urban fringe, where land excluded lies within the AONB but in the view of the SDC still meets the natural beauty criteria and warrants inclusion in the National Park. In light of the fact that the SDC has already appeared at the inquiry or made written representations to argue the case for these areas being included, the SDC does not wish to repeat those arguments here. However, it does wish to draw the Inspector's attention to the recent Secretary of State's decision letter on the New Forest National Park⁷. When giving the reasons for including an area in the National Park, against the advice of the inspector, in addition to finding that the area met the natural beauty criteria, the Minister stated that:

"...If the area is excluded from the National Park, it will no longer have the benefit of the strong planning protection it currently has, as the New Forest Heritage Area will cease to exist. The Minister sees a real danger that the loss of planning protection will lead to further urban encroachment resulting in a severe loss of the remaining natural beauty of the area."

2.4 This is a real concern in relation to a number of areas of AONB designated land, particularly around the urban fringe. The premise of the SDC's objection to their exclusion from the designated boundary of the National Park is that they meet the criteria. However, there is also a danger that their exclusion will rob them of strong planning protection, as acknowledged by the Minister in the previous paragraph, which could lead to the degradation of the natural beauty of the wider Park area. The Minister's comments were made despite assurances given by the Countryside Agency throughout the present public inquiry, that areas of AONB excluded from the South Downs National Park would not necessarily be developed and could be protected through local controls. The SDC considers that a locally derived designation, reviewed regularly through the local planning system, is no replacement for a nationally protected landscape, which carries greater weight in planning terms than any local designation.

2.5 The Minister clearly has concerns about the landscape being safeguarded in the future without a national landscape designation in the New Forest and the SDC would consider that the point is equally pertinent in the South Downs.

3 A Significant Change to the National Park Boundary

3.1 Should the inspector be minded to support a South Downs National Park boundary which was significantly different to that currently proposed, and which in turn led to a significant tract of either or both of the two AONBs being excluded from the National Park, the SDC would most strongly object to the AONB Revocation Orders. In these circumstances the SDC would wish to have the opportunity to make further representations since it would not have had the opportunity to do so during the course of this Inquiry.

⁷ Paragraph 17, New Forest National Park Decision Letter sent by the Minister of State, the Rt Hon Alun Michael MP on behalf of the Secretary of State and signed by Gillian Lewisohn (DEFRA), 28 June 2004 – Inquiry Document No: CD 203

4 Recommendation

- 4.1 The SDC considers that the AONB Revocation Orders should be recommended for confirmation subject to there being no significant deletions of AONB land from the designated National Park boundary.

Appendix A

List of areas proposed for inclusion by SDC that are, in part or in whole, currently designated as part of the Sussex Downs AONB and would lose that protection unless they were included within the South Downs National Park:

Proofs of Evidence	Inquiry Document Number
A Clearer Boundary: Shoreham – Falmer	3275/4/1
Land North and North-East of Foredown Tower	3275/5/1
& supplementary proof	3275/5/3
Benfield Valley – North	3275/6/1
Toad’s Hole Valley	3275/7/1
Land West of Ditchling Road	3275/8/1
Coldean Woods	3275/9/1
The Cliffs – Brighton to Newhaven (at Telscombe Cliffs)	3275/10/1
Upper Beeding (small part of area)	3275/21/1
Ringmer (Gote Farm) (small part of area)	3275/27/1
East of Glynde (small part of area)	3275/32/1
Written Representations	Inquiry Document Number
Southwick Tunnel	WR 3275/1a *
Mile Oak – North of the A27 (part of area)	WR 3275/2a
Hillside north of Green Ridge	WR 3275/3a

* The Countryside Agency has accepted that the designated boundary at Southwick Tunnel does not follow any recognisable features on the ground and has proposed to amend the boundary in line with that suggested by the SDC. As a result, the SDC has now withdrawn this objection.