

South Downs National Park Public Inquiry

Part 2: Boundaries

Mile Oak – North of the A27

Written Representation

by



November 2003

1 Introduction

- 1.1 The South Downs Campaign (SDC) submits the following written representation for the boundary of the designated South Downs National Park within Section P, Map 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 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 written proofs of evidence ‘SDC ‘In Principle’ Support for the South Downs National Park’² and ‘SDC Boundary Process’³.

2 Detailed Boundary - Section P, Map 34: Mile Oak – North of the A27

2.1 Description of the Area and its Boundary

- 2.1.1 The SDC is proposing that the small area of land to the north of the A27 at Mile Oak should be included in the South Downs National Park. This includes a grassed over, covered reservoir, open downland and a small amount of development associated with the water works at the bottom of the valley. The whole area lies in close proximity to the A27 trunk road.
- 2.1.2 The SDC’s proposed addition suggests a boundary which follows the edge of the carriageway on the northern side of the A27 from Grid Reference TQ 242 078 around to TQ 248 080 as shown on Map 1 in Appendix A⁴. However, the SDC requests that the proposed boundary should also be considered alongside the SDC’s proof of evidence - A Clearer Boundary: Shoreham - Falmer⁵.

2.2 Justification Against Criteria – Natural Beauty

- 2.2.1 The land is mostly designated as part of the Sussex Downs Area of Outstanding Natural Beauty (AONB) and is predominantly grassland with some scrub and tree growth. The SDC considers that the land excluded from the boundary has not been degraded.
- 2.2.2 Of concern to the SDC is that the downland, a prominent part of the landscape, and the grass-covered reservoir, have been excluded from the National Park. The SDC disputes the Countryside Agency’s assertion that “*the reservoir and associated development to the north of the A27... ..does not meet the natural beauty criteria*”⁶.

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 Appendix A – Inquiry Document No: WR 3275/2b

⁵ A Clearer Boundary: Shoreham - Falmer – Inquiry Document No. 3275/4/1

⁶ South Downs National Park: The boundary & the reasoning for it. (CA 133), page 20 – Inquiry Document No: CD 023

The SDC considers that they continue to meet the criteria, with the landscape flowing down into the side of the cutting of the A27⁷. This cutting has been sympathetically graded and grassed over so that it blends into the surrounding downland to the north and appears very much of downland character.

- 2.2.3 The reservoir itself is visible from viewpoints lower down (including the A27). However, as it is grassed over, it is not a significant distraction and from higher ground, the reservoir is ‘lost’ in the wider landscape. Land to the south-west of the reservoir is downland, often grazed as a whole with the wider area. Recently it has been fenced off while construction of a water pipeline has occurred. However, once this construction is finished, it is expected that this land will be returned to grazing.
- 2.2.4 The SDC considers the enclosed areas associated with the water works in the valley bottom are unobtrusive, not unattractive themselves and contain a reasonable number of mature trees⁸. These help to screen what little infrastructure there is as well as helping screen some of the farm buildings to the north.
- 2.2.5 The SDC considers that at a minimum, the area of downland, around and including the reservoir (which are part of the AONB) should be included.

2.3 **Justification Against Criteria – Opportunities For Open-Air Recreation**

- 2.3.1 The SDC considers that the designated boundary impacts on recreation in the area. The designated boundary severs the Monarch’s Way, a nationally important right of way. The SDC considers this could complicate the management of Monarch’s Way. 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 a 200 metre stretch of the Monarch’s Way from the National Park could cause confusion and additional bureaucracy.
- 2.4 **Additional Considerations** Some of this area 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 (particularly telecommunications masts) with a potentially detrimental effect on the landscape setting of the National Park.
- 2.4.2 The SDC considers there is some discrepancy between the AONB boundary shown on the *Proposals Maps for the Brighton & Hove Local Plan*⁹ (and the earlier *Hove Local Plan*¹⁰) and the original AONB designation map. It is certain that the covered reservoir on the lower slopes of Cockroost Hill at grid reference TQ 245 081 and the Downland to the south west of the reservoir are inside the AONB. However, it is unclear whether the whole of the land associated with the Southern Water works is

⁷ Photo 1, Appendix B – Inquiry Document No: WR 3275/2b

⁸ Photo 2, Appendix B – Inquiry Document No: WR 3275/2b

⁹ Brighton & Hove Local Plan – Second Deposit Draft – Inquiry Document No: CD 096

¹⁰ Hove Local Plan Proposals Map – Inquiry Document No: CD 098

outside the AONB, as depicted by the Brighton & Hove Local Plan, or just part of it. From the Sussex Downs AONB map, the SDC considers that the latter seems more likely¹¹.

- 2.4.3 The SDC considers that the existing boundary is confusing and unnecessarily complex, contrary to the Countryside Agency's criteria for designating National Park boundaries. People walking out on the Downs, on Monarch's Way, would find themselves leaving the National Park one side of the reservoir and re-entering it on the other.
- 2.4.4 The SDC proposes that using the road as the boundary would be the simplest and most easily understandable line on the ground. The existing boundary follows a two stranded barbed wire fence near the reservoir, which is not a very obvious or permanent feature in the landscape. If the SDC's proposal is accepted, the tunnel under the A27 would then act as a very clear gateway from Mile Oak into the National Park.
- 2.4.5 The designated boundary also risks confusion in planning terms as it creates a small island of land under the planning control of Brighton & Hove City Council, completely divorced from the rest of that Council's essentially urban area of planning responsibility. Given the rural downland context of this area with its strong associations to the wider South Downs, the SDC considers it would be more appropriate for this area to be part of the South Downs National Park and under the planning control of the National Park Authority.

3 Recommendation

- 3.1 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 the area at Mile Oak, north of the A27, in the South Downs National Park.

¹¹ Map 2, Appendix A – Inquiry Document No: WR 3275/2b