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PROOF FOR SUBMISSION

1007/849/2/1

SOUTH DOWNS NATIONAL PARK INQUIRY 2008

TOPIC 3: Boundary Petersfield/Pulborough

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On behalf of

West Sussex County Council and Chichester District Council

**HDA ref: 373.4
February 2008**



SDNP Inquiry 2008/Topic 3/373.4/4.1/MH/sw/Feb 08

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HDA18X Plan HDA18C, with national and county South Downs and Hampshire Hangers character area boundary added.

HDA100 Boundary Overview and Plan Index

HDA101A Old Ditcham & South Harting: Proposed boundary shown on aerial photograph

HDA102A Old Ditcham & South Harting: Boundary Plan

HDA101B Bepton / Heyshott: Proposed boundary shown on aerial photograph

HDA102B Bepton / Heyshott: Boundary Plan

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HDA102C Graffham to Bury: Boundary Plan

HDA101D Bury to Storrington: Proposed boundary shown on aerial photograph

HDA102D Bury to Storrington: Boundary Plan

1 INTRODUCTION

1.1 Qualifications, experience and scope of evidence

1.1.1 Moira Hankinson gave evidence for West Sussex County Council and Chichester District Council at the first stage of the South Downs National Park Inquiry. My qualifications and experience are set out in that evidence (*1881/2698/1/1; Section 1.1*).

1.1.2 I also gave evidence at the New Forest National Park Inquiry, on behalf of Southern Water and the Quarry Products Association (*ref: 1881/2698/1/10; para 1.1.2*).

1.1.3 This evidence sets out the County Council's and District Council's case for the drawing of a boundary that is consistent with the recommendation by the Inspector to exclude the western Weald from the PSDNP. The Councils' recommended boundary line appears on Plan HDA100, and in more detail on Plans HDA101A to 102D.

2 EXCLUSION OF THE WEALD

2.1 The Council's case

2.1.1 The principle of the Inspector's boundary broadly accords with the Councils' 'Downs-area' evidence (*1881/2698/1/6 and 7*). The Councils support the principle of this boundary and agree with the Assessor and Inspector that the Wealden landscapes do not have National Park characteristics and do not meet NP statutory criteria. The Councils' position on the Wealden landscape as AONB will be dealt with in Topic 5 of the reopened Inquiry.

2.1.2 My evidence on SDNPI 2008 Topics 1 and 2 (*1007/1/1, appended to 1007/1/1*) considered that the changes to the statutory criteria and precedent arising from NERC and Meyrick do not change the substance of my 'Downs-area' evidence. There continues to be no support for inclusion of the Wealden area in the South Downs National Park.

2.1.3 Other bodies have submitted evidence that seeks to reopen the case for inclusion of the Weald. The Councils reserve the right to respond to that evidence. This document is addressing only those topics required by Defra and the Inspector at the reopened Inquiry and assumes that the Weald is excluded, in line with the Inspector's recommendations.

3 THE DOWNS-AREA BOUNDARY

3.1 The principles of the boundary

3.1.1 **The Assessor's principles:** The SDNP Assessor considered the characteristics that contributed most to the special qualities of the proposed National Park to be (in summary) (*SDNP IR Annex A 6.94*):

- strong relief;
- distinctive smooth topography, dry valleys;
- dramatic scarps, hanger woods;
- panoramic views, exposure;
- river valleys cutting through the chalk ridge;
- few settlements;
- archaeological remains;
- spring-line settlements

3.1.2 The Assessor found these characteristics to be most evident in the chalk ridge, broadly coinciding with countryside character area 125, plus the Hampshire Hangers (*Annex A, 6.95*). Character area 125 and the hangers are mapped at Plan HDA18X.

3.1.3 The Assessor found that:

- 'Distinctive 'South Downs' character ... correspond(s) with those areas that have typical chalk downland characteristics' (*SDNP IR Annex A para 6.31*).
- 'If a tract of land does not share the characteristic natural beauty of the core area, it should not be included' (*op cit para 6.32*);
- 'land should be included ... for visual reasons where it is of high quality, **contiguous** with the chalk downland, and where visual links form a **dominant** characteristic ... the boundary should be drawn close to the escarpment to ensure that this is the case'. He found the maximum extent of dramatic visual influence to be 4km; but should often be '**much closer to the chalk escarpment**' (*Annex A, para 6.149; Assessor's emphasis; my underlining*).
- '... walking in an iconic landscape with such distinctive sense of place provides an open-air recreational experience of exceptional value' (*Annex A, para 6.19c*).
- '... the chalk downland alone ... most fully meets [those] requirements'; compared with the relative activity of 'A network of minor roads and scattered settlements [which] permeates most of the ... Wealden areas ...' (*paras 6.220; 6.219*).
- '... the northern boundary of the proposed NP be redrawn to follow easily recognisable features within the 'Scarp Footslopes' landscape type' (*SDNP IR Annex B para 2.40*).

3.1.4 That 'Scarp Footslopes' landscape type is identified in the 1995 'Landscape Assessment of the Sussex Downs AONB' (*CD 182; Plan copied at my Appendix B*). I have drawn the Sussex Downs Assessment landscape character area boundaries on Plans HDA102A to 102D, as a black hatched line, with their landscape area number and title indicated. The Scarp Footslopes area is identified as: '**4. Wealden landscapes: Scarp footslopes**' – a zone extending about 3km north across the Weald from the chalk scarp.

- 3.1.5 The CD182 plan (*my Appendix B*) distinguishes between Chalk landscapes (generally in shades of green) and Wealden landscape (generally browns). The 'Scarp footslopes' are clearly Wealden landscapes, which are considered by the Assessor as, generally, not having NP qualities. I therefore take his guidance overall to mean that, although the boundary should be in the 'Scarp Footslopes' area, it should be close to the chalk escarpment, so including all of the downland landscapes.
- 3.1.6 **The Inspector's principles:** The Inspector agreed with the Assessor. He also found that the traditional National Park qualities are tranquillity, openness, remoteness, relative wildness and a distinctive identity, reflecting core characteristics (*SDNP IR Part 2, 2.19, 2.27*). He found that the downland landscapes generally had those characteristics, and that the non-chalk landscapes failed to demonstrate those qualities, and should be excluded (*IR Part 2, 2.62-2.64; 2.71*).
- 3.1.7 The Inspector's recommendation is that PSDNP boundary length E to H **'be reviewed to exclude lower quality landscapes and non-chalk landscapes other than where the latter have a strong visual link or other association with the core chalk Downs'** (*IR Part 2, para 2.71*).
- 3.1.8 It is clear that neither the Assessor nor the Inspector were designating landscape because they happened to be chalk-based downland landscapes. They assessed all of the PSDNP landscapes and found National Park qualities of natural beauty and recreation only in the downland areas, because of their relative wildness, remoteness, tranquillity and distinctive character. Those characteristics fail to occur in the Wealden landscape types, which have more settlements and roads, are busier, with very attractive but not iconic landscapes – quintessentially pretty English countryside, with attractive walks, but not of National Park quality or character.
- 3.1.9 The Inspector indicated a general line for the proposed boundary (*SDNP IR Vol 3 pp 1, 2, Plans 1A, 1B; copied on to Plan HDA100 for convenient reference*).

4 PRINCIPLES FOR THE SDNP/WEALD BOUNDARY

4.1 Methodology

4.1.1 I set out my overall methodology in my 'in principle' and 'Downs-area' evidence (1881/2698/1/6, Section 4.2). It follows the CA/SNH Guidance on identification and boundaries for National Parks (CD57, paras 9.5-9.6). I have already assessed the Weald and Downs against the CA's criteria (CD 57, paras 7.22, 7.23) of:

- landscape quality
- scenic quality
- rarity
- representativeness
- conservation interests
- wildness
- associations
- tranquillity.

Those assessments are in my 'in principle' evidence (1881/2698/1/1, paras 9.2.4, 9.3.4, 9.4.3). I used those criteria to assess the natural beauty of each character area: the Downs, the Weald and the Coastal Lowlands. I also assessed the recreational opportunities within each character area.

4.1.2 In my 'Downs-area' evidence, I identified that, if anywhere were to be a National Park, then it was the Downs that came closest to meeting the qualities of a National Park. I set out the principles for a boundary for a SDNP that included those areas with more National Park characteristics (1881/2698/1/6, para 5.5.2). These are, in summary:

1. **Geology:** primarily the landscape types deriving from the underlying chalk;
2. **Topography:** high ground, but including internal valleys;
3. **Land use:** Areas with a light settlement pattern (i.e. relatively remote and wild), so generally excluding towns and villages. Also excluding areas severed by main roads from 'the extensive tract';
4. **Character:** the Downs, because it is these landscapes that have more of the National Park characteristics;
5. **Designation history:** Hobhouse, AONB; including the pragmatic inclusion of narrow areas of AONB, likely otherwise to be de-designated. This latter issue was more relevant to other perimeters than to the western Weald – where there is continuity with AONB landscapes to the immediate north.

4.1.3 The Inspector, in reviewing the essential qualities of a National Park and boundary setting considered the following matters to be particularly important:

- scenic quality;
- unspoilt character;
- characteristic natural beauty;
- a sense of openness, relative wildness and an ability to 'get away from it all'.
- exclusion of sizeable settlements at or close to the boundary;

- not following parish boundaries, unless they coincide with a clear physical feature;
- conservation interests, in some circumstances;
- a markedly superior recreational experience, with public access and opportunity to 'get away from it all'; with a higher bar than that applied by the CA;
- following obvious and easily identifiable physical features such as roads and watercourses;
- omitting unsightly development at the edges;
- including features of scientific, historic and archaeological significance at the margins, subject to meeting the statutory criteria;
- the boundary within transitional landscapes to be drawn conservatively close to the core of the NP

(SDNP IR Part 2, paras 2.29-35; 2.36-42; 3.1-3.4; 5.1-5.5; 6.1-6.10).

4.1.4 The 'National Park' qualities described by the Assessor (*para 3.1.3 above*) are broadly similar to those used in my 'Downs-area' assessment.

4.1.5 My 'Downs-area' evidence identified the main area that met those criteria, to be included in the National Park; the main Wealden and Coastal Lowlands areas to be excluded and an intermediate zone for more detailed scrutiny. For the area south of the line between Petersfield and Pulborough, that 'scrutinise' zone was relatively narrow (*1881/2698/1/7; Plans HDA18C and 20C; attached to this evidence for convenience*).

4.1.6 The CA/SNH Guidance (*CD 57*) first requires the assessment and definition of character areas. At this detailed scale, I have used those found most appropriate by the Landscape Assessor – the Sussex Downs AONB Landscape Assessment character areas. These are identified at my Appendix B and mapped on Plans HDA102A to D.

4.1.7 I have applied the principles set out by the Assessor and Inspector to those character areas. Those principles are:

1. **Inclusion of the downland chalk landscapes that have NP qualities.** Plans HDA102A to 102D have the chalk geology boundary and the boundary of the CD182 'Chalk landscapes' indicated. Generally the chalk itself extends north beyond the scarp by about ½ to 1km, forming distinctive footslopes immediately below the scarp.
2. **Exclusion of the busier, more settled Wealden landscapes.** The CD182 'Wealden landscapes' are also on Plans HDA102A to 102D.
3. **Boundary to be close to the escarpment.** The OS steep contours and 'chalk escarpment' landscape areas are shown on Plans HDA102A to 102D.
4. **Boundary to be within the CD182 'Scarp Footslopes' zone.** This character area is also shown on Plans HDA102A to 102D.
5. **Following easily-identifiable lines on the ground,** such as roads, streams and distinctive footpath/hedgerow lines.

4.1.8 The combination of above criteria 3 and 4 mean that the boundary would be within the 'Scarp foothills' character area, but close to the escarpment. As the underlying chalk itself extends into the 'Scarp foothills; by about ½ to 1km, this marks the line that coincides with most of the Inspector and Assessor's criteria. Beyond the chalk footslopes a line of springs have led to the development of villages – the start of the more occupied Wealden landscapes. Drawing the line south of these villages complies with criterion 2 above. Because of the topography and to link the villages, there is a series of west-east roads and rights of way. These can form easily identifiable boundaries (*criterion 5 above*), and follow the "grain" of the landscape. Hence, a line about ½ to 1km from the scarp, near the chalk/greensand boundary, excluding the Wealden-edge villages would most closely meet the criteria. This would also be consistent with the southern National Park boundary, which generally includes the foothills about 1km south of the downs, but excludes the busier Coastal Lowlands areas.

4.2 Boundary assessment

4.2.1 County Council landscape staff carried out a preliminary desk-based study of a potential boundary line, for inclusion in the Council's representations on the reopening of the SDNP Inquiry (*WSCC representations, September 2008, Plan A, at my Appendix A*). The County Council's landscape staff and I have subsequently carried out more detailed desk and field assessments, to refine that preliminary line.

4.2.2 The length addressed is the west-east boundary through West Sussex, from south-east of Petersfield to south-west of Pulborough. We have not addressed the north-south boundary along the Hampshire Hangers, which falls outside the administrative area of the authorities.

4.2.3 The County Council's representations considered that, ideally, the boundary should follow parish boundaries. This objective would simplify the planning procedures, avoiding Parish Councils having to deal with two planning authorities. However, this issue could be resolved by the delegation of planning powers from the NPA to LPAs. Unless they coincide with the combined natural beauty and recreational criteria, I have not followed parish boundaries in these recommendations. This is consistent with the Inspector's conclusions (*SDNP IR Part 2, pp 44-46, paras 5.1-5.5*).

4.2.4 In principle, the County Council's staff and I have been looking to identify a northern National Park boundary that very clearly has to its south relatively wild, open, large-scale, landscapes, with few buildings, roads or other disturbance. This then means a clear distinction between those landscapes and the more complex, smaller-scale landscapes of the Weald, with villages, roads, smaller fields and streams. Those Wealden landscapes continue north and on into the Surrey Hills. There would then be a distinctive break

between the landscapes with National Park qualities, south of the boundary, and the Wealden AONB landscape, north of the boundary, consistent with the Assessor's and Inspector's conclusions.

4.2.5 In my site visits, I have generally refined the line by asking myself if I can identify distinctive downland landscapes to the south and Wealden landscapes to the north. If I find that I have just gently undulating topography on both sides, with small fields, farmsteads, ditches and ponds, villages and numerous small copses, then I am too far out into the Weald. In those circumstances, a non-specialist visitor would also wonder why the NP boundary has the same landscape on both sides. The boundary line should be close to where a view to the south will be dominated by the chalk scarp, its big woodlands and open, uninhabited lower slopes.

4.2.6 I have added the Inspector's 'generalised boundary' to Plans HDA100 and HDA102A to 102D. In putting the boundaries to the 'Chalk landscapes', the 'Scarp Foothills' and the Inspector's generalised line on these more detailed plans, at 1:100,000 and 1:25,000, it can be seen that the 'generalised line' extends north beyond the Assessor's recommended 'Scarp Foothills' zone. I consider that this 'generalised line' is too far north, including a very wide zone of Wealden landscapes that have more in character and 'busy-ness' with the contiguous areas to their north. I consider that it would be more consistent with the Assessor's recommendations and the Inspector's findings on matters of principle that this zone should properly remain within the Wealden AONB and that the boundary should be much tighter to the escarpment. Visitors to the SDNP will then clearly see and experience a National Park to one side and a quite different AONB to the other.

4.2.7 Of the Inspector's, Assessors' and our criteria, these do not all conveniently coincide at a single line. There is inevitably a grading of character, quality, openness and remoteness across the landscape. I consider that those characteristics change quite markedly within ½ to 1km of the scarp. However, within that band, I have sometimes proposed two alternatives, but stated my preference. This will allow the Inspector to consider the degree to which he considers, for example, a belt of footslopes to be included or not.

5 PROPOSED BOUNDARY

5.1 The proposed boundary

- 5.1.1 The proposed boundary is defined west to east in lengths A, B, C and D. These are shown on Plans HDA102A to 102D and on their matching aerial photographs, Plans HDA101A to 101D.
- 5.1.2 The principle of the boundary can be quite clearly seen on both the OS base plans and the aerial photographs. To the south of the line are the steep, complex contours, up to above 200m AOD, of the South Downs scarp; to the north are the much more gently rolling Wealden contours, generally at about 10 to 90m AOD (*OS bases on HDA102A to 102D*). The aerial photographs show the large-scale, open fields and major woodlands that give the downs their characteristic landscape; the very few roads and the almost complete absence of settlements that provides these landscapes with their remote, relatively wild character. North of the proposed boundary, the aerial photograph shows the quite different Wealden AONB character, of small fields, copses, numerous roads, farmsteads and villages (*Aerial photographs, Plans HDA101A to 101D*).
- 5.1.3 The line generally follows easily-identifiable features, usually roads, footpaths and streams; occasionally field boundaries. It contains the highly distinctive north scarp of the South Downs and the immediate footslopes. The line generally excludes villages, as these are more characteristic of the settled, less remote, less 'wild' landscapes north of the Downs.
- 5.1.4 **A. Old Ditcham/South Harting length** (*Plans HDA101A and 102A*): At the western end, in Hampshire, there is a very marked change at Buriton, between the steep, dramatic downs to the south and almost-flat greensand vale that contains Buriton and Old Ditcham, to its east, on the county boundary. The Councils' SDNP boundary line starts just west of the county boundary south of Buriton (*Plan HDA102A*).
- 5.1.5 Throughout this boundary exercise, the villages north of the footslope have been generally excluded, because they are, by definition, not remote or wild and are characteristic of the Weald, not the Downs. Hence, the proposed boundary excludes Buriton. It then follows a distinct line, of Pitcroft Lane, then a footpath following hedge and stream lines, with the rolling chalk footslopes to the south and the flatter greensand vale and farmsteads of Cowhouse, Old Ditcham and Torberry Farms to the north.
- 5.1.6 Between Old Ditcham and South Harting is the distinctive chalk outlier of Torberry Hill, with a hill fort. The boundary therefore runs along the stream line and lane north of Torberry Hill. The landscapes to its north are not downland landscapes. The line curves north, east and south around Torberry Hill, then back to the main scarp footslopes,

excluding the settlement of South Harting. We considered drawing it along the footpath north of Church Farm, which lies close to the geological boundary. However, there is a more marked visual change where the open fields about the built-up area of South Harting, so I have followed that line.

- 5.1.7 The County Council's desk-study line joined up the two chalk outliers of Torberry Hill and Elsted in a straight line (*blue line on Plan HDA102A*). The officers agree with me that field assessment and consistency should keep the 'Harting' group of settlements and roads in the Wealden AONB, with the NP boundary line more clearly distinguishing the open footslopes of the NP to the south.
- 5.1.8 From East Harting eastwards, the line follows easily-identifiable roads that generally lie about ½km to 1km north of the scarp. This allows the immediate downs footslopes to be included in the NP – the area in which the scarp is absolutely dominant in the landscape. Beyond the boundary to the north lie the pretty AONB landscapes of the Greensand Weald, with the many villages, roads and complex small field patterns of East Harting, Elsted and Treyford (*Plans HDA102A to 102B*).
- 5.1.9 **B. Bepton/Heyshott** (*Plans HDA101B, 102B*): East of Treyford, a minor road runs parallel to, and north of, the scarp. It links a line of farmsteads, hamlets and villages, which generally lie to the north of the road, on the rolling topography of the greensand (Didling, Linch Farm, Church Farm, Bepton, Horley Farm, Cocking). To the south of this road, very markedly, are the open footslopes of the chalk, with almost no buildings or roads, and directly sweeping up to the scarp. This road (including lengths called Bugshill Lane and Bell Lane) again marks that very distinct boundary between the remote downlands to the south and settled, busier Wealden landscapes to the north.
- 5.1.10 East of Cocking, that footslope road continues. Our preferred line follows the road between Cocking and Heyshott (*more southerly of the dashed red lines on HDA102B*).
- 5.1.11 However, similar large-scale fields extend northwards to Hoe Copse and Heyshott (*aerial photograph at HDA101B*). These are off the chalk, but there are no other roads or settlements, and the Inspector may consider this belt of land to have similar National Park qualities.
- 5.1.12 East of Heyshott (*Plan HDA102B*), we again propose two options. The County Council's desk-top line follows a footpath and field boundary line, very close to the chalk boundary (*blue on HDA102B*). However, field assessment identifies that, travelling south from Hoyle, there are dramatic, close views of the scarp and the open fields rolling down from it, from Hoyle Lane. Our alternative line therefore follows Hoyle Lane east of Heyshott,

then a footpath/ field boundary/ linear copse line to Baxter's Copse. Baxter's Copse is part of a broad belt of large Wealden woodlands and plantations that continues north-westwards past Midhurst. This woodland belt is clearly Wealden, and blocks views of the scarp from further north. Our alternative boundary here therefore runs south of Baxter's Copse, then south of the Woodcote Farm complex of buildings. My preferred line is the more southerly, following the road and the chalk foothills. The northern line also contains distinctive foothills, but is less clear on the ground.

- 5.1.13 **C. Graffham to Bury** (*Plans HDA101C and 102C*): South of Graffham, the proposed line follows a distinct footpath/ field boundary line with the big open fields of the chalk footslopes to the south and the streams, villages and copses of the Weald to the north. We have included the southernmost part of Graffham village because omitting it would create an awkwardly-shaped boundary, and because this part of the village is very small-scale and lies on the chalk. The next most obvious line to the south would be the tracks and roads through Tagents Farm and Lavington Stud, but these almost abut the scarp and include no footslopes.
- 5.1.14 At East Lavington, the County Council's desk-based line ran along the easily-identified line of the Seaford College drive, Beechwood Lane and the minor road to Barlavington (*blue line on HDA102C*). This is very tight to the escarpment, so we have proposed another alternative, that includes more of the chalk footslopes across Lavington Park and around to Barlavington, but follows a more complex line of footpaths, field boundaries and copses (*red line on HDA102C*). In this case, my marginal preference is for the more northerly line, because it includes a band of footslopes and the southern line is very close to the scarp foot.
- 5.1.15 At Barlavington, the scarp turns abruptly southwards for 2 to 3 kms, then turns east again, south of Bignor and Bury. South of Barlavington, the scarp footslope is again followed by a minor road – Folly Lane. Distinctively to its west are the footslopes and scarp; to its east are the villages, streams, small fields and copses of the Weald (Barlavington, Sutton and farmsteads).
- 5.1.16 At Sutton, the County Council's desk-top line included part of Sutton village, Bignor and countryside to their east. On my field assessment, I found that this area has a very distinctly 'Wealden' feel, and the local topography and copses frequently screen the Downs scarp. In discussion, the officers and I agreed that the boundary should be closer to the scarp – again, to distinguish those settled landscapes around the villages from the dramatic and iconic Downs.

- 5.1.17 The proposed boundary therefore continues down Folly Lane south of Barlavington to Glatting Farm, then turns east along a track/ footpath/ field boundary/ stream line, to Bignor. An alternative line would follow the southern edge of a linear copse. Of these, I prefer the northern line, which includes a more expansive area of chalk footslopes.
- 5.1.18 East of Bignor, the proposed boundary again follows the footslope road to Bury. To its south, the big landscapes of the Downs; to its north are the villages, farms, streams, copses and roads typical of the Weald (Bignor, West Burton, Bury).
- 5.1.19 In this whole length, between Graffham and Bury; at Duncton Down and Barlavington Hanger, the scarp turns south then west, to the Arun valley. The proposed line follows the footslope, along lanes, and excluding the villages of Sutton, Bignor, West Burton and Bury. These villages have more in common with the settled, undulating landscape of the Greensand Weald, with its smaller fields and frequent streams. Beyond this to the south are the great swells of the downs, with almost no settlement, very few roads, no watercourses – a very dramatic and highly distinctive change in the scale, drama and remoteness of the two landscapes. Those settled, fertile, greensand landscape and their villages are lovely examples of AONB landscapes. The great billowing, empty downs have, relatively, so much more of the National Park character providing a quite different, superior, recreational experience.
- 5.1.20 **D. Bury to Storrington** (*Plans HDA101D, 102D*): That contrast is also distinctively seen where the Arun leaves the Weald and enters the Downs (*Plan HDA102D*). To the north, the wide floodplain has gentle valley sides, rising to only 20 or 30m above the valley floor. Quite suddenly, at Bury/Houghton/Amberley, the valley floor narrows and is steeply contained by high downs, 100 to 150m above the valley floor. The recommended line crosses the Arun valley at this distinctive pinch-point. It excludes the settlements of Bury and Amberley and their modest 20 metre hills; it includes the South Downs Way and the great spurs dropping from Bury Hill and Amberley Mount – above 160m AOD. The settlements of Houghton and Amberley Station are included, to allow the South Downs Way, and its dramatic views west and east, to be included.
- 5.1.21 The boundary itself follows Houghton Lane south of Bury, then the South Downs Way as it crosses the River Arun on a footbridge, then east to join New Barn Road (B2139) south of Amberley.
- 5.1.22 Between Amberley and Storrington, the Turnpike Road (B2139) runs along the footslopes and again marks the boundary between the dramatic, unsettled scarp to the south and the hamlets in their gently rolling countryside to the north (Rackham, Springhead Farm) (*Plan HDA102D*).

5.1.23 At Storrington, the line returns to the AONB boundary (*Plan HDA102D*). I accept that the belt of land immediately south of Storrington does have the roads, farmsteads and smaller field pattern of the Weald. However, this is the length where there is no further AONB to the north. West of Storrington, areas that are excluded from the SDNP can realistically remain AONB. From Storrington eastwards, the area north of the AONB boundary is undesignated Weald. In this length, the AONB extends some little way beyond the footslopes, into the more settled, busy landscapes of the Weald. This narrow belt qualifies under my 'Designation history' criterion (*para 3.1.1-bullet 5 above*) – an area still with the natural beauty of the AONB, in which the recreation experience includes views towards the scarp and that would, if not SDNP, lose its AONB status. This is the same as the NFNP Inspector's decision, that 'pragmatic' boundaries for the extensive tract are occasionally appropriate, if the alternative is AONB de-designation (*NFNP Inspector's Report, para 4.175*). The Secretary of State accepted that recommended area.

5.1.24 The County Council officers' desk-based line at Storrington continued the landscape principles established further east – excluding the more settled, occupied landscapes south of Storrington (*blue line on HDA102D*). In discussion, we agreed that a 'pragmatic' line, to avoid AONB de-designation (*as above*) should be proposed (*red line on HDA102D*).

5.2 The proposed boundary: conclusions

5.2.1 The Councils support the Inspector's recommendations, that the Wealden landscapes are generally of AONB quality, but do not have the tranquillity, openness, remoteness, relative wildness or distinctive identity that are needed to satisfy the conjoined NP criteria of an extensive tract, with outstanding natural beauty, of a character that provides an exceptional open-air recreational experience.

5.2.2 Those characteristics exist, to much nearer to National Park quality, in the downland landscapes of the PSDNP. If there is to be a SDNP, the Council's support the inclusion of the downland landscapes, with their highly characteristic, iconic landscapes and sense of 'getting away from it all'.

5.2.3 On that basis, and supported by the Assessor's principles, I consider that there is a relatively narrow zone across which the landscape changes quite markedly from the open, remote dramatic downs to the gentler, smaller-scale landscapes of the Weald, with numerous villages, roads and farmsteads. This marked difference can be quite clearly seen on the OS plans, on aerial photographs and in the field.

- 5.2.4 I am concerned that, if the line is drawn too far to the north of the scarp, it will include within the NP a broad belt of Wealden villages, roads and landscapes that, simply, do not have NP qualities or characteristics.
- 5.2.5 Such a line would also, inevitably, be crossing through countryside of a generally similar, Wealden, character. Neither I, as a landscape expert, nor the casual visitor to the NP would be able to identify why one area of gently rolling countryside of villages, small fields and lanes should be within the NP and the adjacent identical area should be AONB.
- 5.2.6 The boundary recommended with this evidence clearly distinguishes two very different landscapes, easily identifiable to any non-specialist visitor to the NP. Looking to the south of this line, the dramatic scarp is dominant in the view. Footslope fields are large-scale and sweeping; there are almost no roads, villages, or farmsteads. The experience of walking this area is of remoteness, relative wildness, tranquillity and distinctiveness.
- 5.2.7 Looking to the north of this line, the landscape is very pretty, but far less dramatic. Footpaths pass around small fields and cross the many lanes linking frequent villages and farmsteads. This is a comfortable, familiar landscape, with traffic and residential and commercial activity. It is quintessential lowland England. It is not a National Park.
- 5.2.8 The boundaries that the Council's officers and I have assessed most clearly follow that distinctive change in the quality and characteristics of the landscape. Look south – National Park; look north – Area of Outstanding Natural Beauty.

6 DEFRA BOUNDARY

6.1 Introduction

6.1.1 Defra instructed consultants to review Boundary section E to H in the light of the Inspector's findings (*NE brief to consultants, para 13*).

6.1.2 The Consultants produced a report and their proposals are illustrated in the Defra 'Recommended boundary modifications-June 2007', Maps (i) to (vii). The consultants were Alison Farmer Associates; the report is here referred to as the AFA report.

6.1.3 I comment only on the length within West Sussex, from the county boundary east of Buriton, to Storrington.

6.2 The Consultant's report

6.2.1 The Consultant's report was 'commissioned by Defra from Natural England', but does not reflect Natural England's position (*AFA report, note after title page*).

6.2.2 The AFA report is based on the Inspector's 'indicative line' and on the 'analysis provided by the Inspector and his Landscape Assessor' (*AFA paras 1.2.3, 1.3.1*).

6.2.3 I have identified that the Inspector's indicative line falls outside the 'Scarp footslopes' character area, recommended by the Assessor (*SDNP IR Annex B para 2.40; referred to at my para 3.1.3 above*). Although the AFA report recognised that anomaly (*AFA para 2.2.12*), it did not take proper account of that Assessor's recommendation, nor of the CA/SNH guidance on defining National Park boundaries (*CD57; my Section 4.1 above*). The AFA assessment starts from an assumption that their area of search includes 'the Wealden Greensand ... Rother Valley and A3 corridor' (*AFA, para 1.3.2*). The Rother Valley is well beyond the 'Scarp footslopes' area **within** which the boundary should be.

6.2.4 The AFA report also uses the CA 'Approach to defining NP boundaries', used to define the original PSDNP (*para 1.3.4*) (*CA Approach at CD31 Table 1*). However, the Inspector and Assessor found the CA's methodology and conclusions lacking, in relation to inclusion of large areas of Wealden landscapes that do not have NP qualities, and had reservations about either the wording or application of the CA's Approach (*SDNP IR Part 2 6.1-6.10, Annex A Section 6*). The AFA report reliance on the CA 'Approach' does not take full account of the requirement that the land within the National Park must have National Park characteristics, which have been defined by the Inspector. The occurrence of those qualities has not been assessed in the AFA report.

6.2.5 I consider that the AFA methodology and assessment are too focussed only on the Inspector's 'generalised line', and insufficiently focussed on both the Inspector and

Assessor's strong recommendations that the land must have NP characteristics of tranquillity, openness, remoteness, relative wildness and a distinct identity (*SDNP IR Part 2, 2.1.9, 2.2.7*). Those key NP qualities have not been assessed in the AFA report. Nor has the Assessor's recommendation that the boundary should be close to the escarpment and **within** the 'Scarp foothills' been properly taken into account.

6.2.6 The AFA report is too focussed on the practicalities of refining a narrow potential line. Like the original CA 'Area of Search' report, criticised by the Assessor and Inspector, the AFA report starts with an assumption, then does detailed work on that assumption. In this case, that assumption is that the 'generalised line' is the line to be assessed in detail, and not whether the land so included actually meets the Assessor and Inspector's strong recommendations. Nowhere does the AFA report question whether there is any clear distinction in the essential NP qualities to either side of the proposed boundary line.

6.3 The AFA boundary

6.3.1 The AFA assessment was based on the 'land surrounding the indicative line put forward by the Inspector' (*AF Report para 2.1.3*). It identified that this differed from the Assessor's recommendation (*AF paras 2.2.11, 2.2.12, 2.4.1*).

6.3.2 I consider that the methodology adopted by the consultants does not follow the CA Guidance on Landscape Character Assessment or boundary-drawing for National Parks. In failing to follow this guidance, the consultants identify a line that includes very substantial areas of Wealden landscapes. Those have numerous villages and roads and have none of the National Park qualities of relative wildness, openness, remoteness or 'getting away from it all'.

6.3.3 There is no clear distinction to the north and south of this line, in terms of character, quality, land use, rarity, representativeness or conservation interest, wildness or tranquillity. The ordinary visitor to the NP will simply not understand why a line apparently drawn at random across an undulating agricultural and wooded landscape should define the difference between an AONB and NP. The only subtle difference is the degree to which the scarp can be seen – and that is hardly a significant difference across this line.

6.3.4 I do not, therefore, address this line in any detail. The land between the scarp and this line has the same qualities and character of natural beauty as the land to its north; and this area has no extraordinary recreational qualities that bring it above normal AONB quality. This zone should remain, as it is, AONB.

6.3.5 My general comments on the AFA line within West Sussex are set out below:

- 6.3.6 **A. Old Ditcham/South Harting** (*Plans HDA100, 1001A, 102A*): The AFA line cuts diagonally north-east from Torberry Hill, across the Scarp Footslopes and into the Sandy Arable Farmland. Within the Scarp Footslopes, there is absolutely no difference in character, remoteness, wildness, etc, in the areas west and east of this line. Nor is there any substantial difference in the visual dominance of the scarp.
- 6.3.7 In extending north into the Sandy Arable Farmland, the line includes areas specifically excluded by the Assessor, as entirely failing to meet NP characteristics.
- 6.3.8 **B. Bepton/Heyshott** (*Plans HDA100, 101B, 102B*): Again, the line zigzags through the Heathland Mosaic area, excluded by the Assessor, and appears randomly to pass through substantial wooded areas and areas of farmland, with identical qualities and characteristics to either side of the line. I can see no landscape assessment rationale for this line; nor can I envisage that the non-specialist visitor would understand why apparently identical areas are either NP or AONB.
- 6.3.9 **C. Graffham/Bury** (*Plans HDA100, 101C, 102C*): Again, the line cuts randomly through character areas, woodland and farmland. None of these areas themselves have any South Downs character nor NP qualities. There must also be wide areas of these landscapes, within and north of the woods, where there is not even any South Downs visual influence.
- 6.3.10 **D. Bury to Storrington** (*Plans HDA100, 101D, 102D*): In this length, the AFA line extends more than 4km from the escarpment. It includes extensive areas well beyond the 'Scarp Footslopes' and with no visual relationship to the Downs.
- 6.3.11 **AFA boundary line: conclusions:** The AFA boundary is too far north. It includes areas specifically found by the Assessor not to have NP qualities or South Downs characteristics. It passes through landscapes which are identical in terms of quality and appearance on both sides of the line. Broad swathes of very similar countryside are either included in, or excluded from, the NP. This will not have credibility with users of the NP and is not soundly based on CA Guidance or NP criteria.

7 CONCLUSIONS

- 7.1 My evidence identifies a boundary line for the SDNP. It includes the land that meets the necessary National Park qualities: distinctive, strongly characteristic, extensive, relatively wild and remote; that provide the nature of the experience in recreational terms.
- 7.2 Those big, iconic, dramatic landscapes lie distinctly to the south of my proposed boundary line.
- 7.3 To the north of my proposed line is a quite different group of landscapes, with much in common across this AONB and the Surrey Hills. These are very attractive areas of quintessentially English countryside, with villages, farmsteads, small copses, many roads, a small-scale, complex field pattern and gently undulating topography. These landscapes, whilst fully qualifying as AONB, do not have the open, dramatic highly distinctive characteristics that provide an exceptional recreational experience. They should not be included with the SDNP boundary.