

SOUTH DOWNS NATIONAL PARK

RE-OPENED PUBLIC INQUIRY

February 2008

Topic 5: Which Areas of land currently designated as AONB should retain AONB status if they are not to be included in the Boundary of a Chalk only South Downs National Park

Submission by West Sussex County Council and Chichester District Council.

JOINT PROOF OF EVIDENCE OF

Esmond Francis Turner

BA, DipLA(Manc), MLI.

West Sussex County Council

and

Sam Howes

BA(Hons) MRTPI

Chichester District Council

Contents

Page

- 2. Witness qualifications and experience.
- 4. Scope of Evidence
- 4. Changes in the Western Weald since 1966
- 8. Recent initiatives influencing Countryside Management
- 16. Re-designation of an Wealden AONB
- 17. Conclusion

1. Witnesses qualifications and experience.

Esmond Turner.

- 1.1 My name is Esmond Turner. I hold a Diploma in Landscape Architecture and am a Chartered Member of the Landscape Institute.
- 1.2 I am Principal Landscape Architect in the Environment and Development Service Group in West Sussex County Council and have held this position for 34 years. Prior to this I spent two years as a Landscape Architect with Sheffield Corporation.
- 1.3 My role in the County Council is that of Manager of a Landscape Team comprising of Landscape Architects and Technical Assistant and a Trees and Woodlands Officer. The team provides strategic landscape advice to all service units in the County Council and the provision of landscape design and advice to farmer, landowners and other bodies including the South Downs Joint Committee.
- 1.4 In the 1970's I was part of a team defining the boundary of the West Sussex section of the High Weald AONB.
- 1.5 In recent years I have managed a Landscape Character Assessment Project of West Sussex from which a Landscape Strategy was

prepared and published in 2005. Currently the team is finalising Land Management Guidelines for each of the 42 Landscape Character Areas within the County. This work is at present is being disseminated to the major audiences within the county, in particular Planning Officers, farmers and landowners and their advisors and Parish Councils.

Sam Howes.

1.6. My name is Sam Howes and I am Deputy Chief Executive at Chichester District Council where I have overall responsibility for the Environment and Economic Services at the Council. I have been employed by the Council in a number of capacities in the planning service since 1988.

1.7 Prior to that I worked in the planning service at North Yorkshire County Council, York City Council and Harrogate Borough Council. I hold a BA(Hons) Degree in Geography, a Diploma in Local Planning and I am a Member of the Royal Town Planning Institute. I have been involved in the District Council's interest in a proposed National Park from the beginning.

2. Scope of evidence.

- 2.1 This evidence has been prepared to provide a justification for re-designation of the Western Weald as an Area of Outstanding Natural Beauty. Such action would be required if the area is to retain its protected status in the event that the South Downs AONB is revoked and a South Downs National Park is designated solely along the chalk landscape.
- 2.2 The area this evidence addresses is indicated on the plan at Appendix 1 to this statement (**Appendix 1. The Western Weald Map (WSCC 1007/3/2)**) and includes the existing AONB which comprises the Sussex Wealden Greensand and the Low Weald.
- 2.3 It covers two aspects:-
- a) Changes in the landscape prior to and since Area of Outstanding Natural Beauty designation in 1966.
 - b) Reference to the initiatives currently in operation which are effectively restoring and perpetuating the quality of the landscape.

3. Changes to the Landscape since AONB designation.

- 3.1 Whilst the Councils have had the clear view that the western Weald does not merit National Park status, they have always maintained that it should retain its status as AONB, for reasons which have been explained extensively in evidence submitted to the earlier Inquiry (**CD 1881/266698/1/1. Section 9.3 paras. 9.3.1 – 9.3.6 and para 9.5.2.)** .
- 3.2 The Landscape Assessor in his supplementary report on the A3 corridor and the Rother Valley has suggested that the Sandy Arable

Farmlands have lost many of its characteristic elements and considers that the condition and intactness of this character area has been extensively eroded and as a result, is not of sufficient quality to meet the natural beauty criterion (**para. 2.19**). This then suggests that the Rother Valley Farmlands do not have sufficient quality to fulfil the AONB criteria. The Councils respectfully disagree with the Assessor in this instance. Two examples of deterioration given namely a 400 KV power line (**para 2.12**) and extensive clearance of hedgerow trees and hedgerows (**para2.10**) actually occurred prior to designation in 1966.

Below are examples of how extensive work being carried over the last few years which is restoring and reversing any deterioration in characteristic landscape elements which occurred prior to and since AONB designation.

- 3.3 Clearly over the last forty years there have been considerable pressures on the Wealden landscape, in particular housing development (at Petworth and Midhurst) and the agricultural need for larger and more modern farm buildings. However many major changes experienced before and since AONB designation, have fallen outside of planning regulations and in most parts were under the guidance and direction of Central Government advisors rather than Local Authorities.
- 3.4 One of the greatest changes to the landscape character in parts of the area has been the removal of hedgerow and hedgerow trees to create larger fields. This was particularly evident in the Rother Valley Farmlands between Petworth and Midhurst, Rogate and on the Wealden fringes at Heyshott. Much of this clearance was grant aided by the Ministry of Agriculture, Fisheries and Food (MAFF, subsequently DEFRA and now NE).
- 3.5 It is important to point out that considerable hedgerow clearance was carried out prior to AONB designation in 1966. From a study of 1947 air photographs it is evident that extensive hedgerow removal

had taken place, especially on the Rother Farmlands, and is particularly evident south-east and south-west of Petworth and also south and south-west of Rogate. (**Appendix 2 (WSSC 1007/3/3)**, 1947 Air Photograph, Frog Farm, Tillington) It is not known if clearance was grant aided by MAFF as has been the case since AONB designation.

- 3.6 A further change during this period was the clearance of woodland and conversion to agriculture. At the time, if MAFF considered woodland areas suitable for conversion to agriculture, the Forestry Commission did not have the authority to refuse a Felling Licence even if they considered the proposal did not follow the then current forestry policy. Several areas of woodland including ancient woodland were lost during this period. The only recourse open to the local authorities to protect important woodland features was to place Woodland Tree Preservation Orders. Unfortunately few TPOs were placed on woodland since the LAs were liable to compensation claims. All that could be achieved was good will agreements for the retention of edge features or significant groups. Having said this, the western Weald still has the highest woodland cover in West Sussex and woodland clearance has had minimal impact.
- 3.7. The use of 'fleece' for crop protection is a visual intrusive element but it is a seasonal feature and lasts for periods of only 8 weeks in late winter/spring.
- 3.8 An unfortunate change experienced in recent years has been the creeping 'gentrification' of the countryside. Two particular examples are firstly the misguided use of non native plant material, around properties, a problem which can be partially attributed to the nursery industry. Secondly there is a desire to create inappropriate 'entrances' to traditional properties, often involving brick walls, columns with Griffons, balls or pineapples, conifer hedges and bowling green verges. These changes are examples of poor character and appear to occur throughout the whole country,

including existing National Parks. Both examples can be attributed to the ignorance of people moving into West Sussex, a result of the close proximity and easy access to the County from London. Sadly there is no statutory control over such inappropriate changes.

- 3.9 Another recent change influencing changing character in the western Weald is the sub-division of fields into horse paddocks using softwood fencing rather than traditional cleft oak or chestnut. More common is the use of electrified tape. The visual impact of this is not quite as apparent in the Weald as elsewhere in the county due to a strong network of hedgerows and shaws.
- 3.10 The 400KV Power Line which follows an east-west route through the western Weald was erected prior to AONB designation. It is an intrusive element, but its visual impact would be considerably greater were it not for a strong tree cover in the area. Its presence was not considered to be too great a detracting feature at the time of designation
- 3.11 Despite the above, in general the quality of the landscape has not diminished so much as to justify loss of its AONB status. A large proportion of the area has experienced very little change including the Low Weald and the Greensands. Where change has been most apparent, it is our opinion that this is not as extensive as has been stated by the Inspectors Landscape Accessor. Whilst the Councils consider that National Park status is not justified, the character of the Weald is certainly of AONB status.
- 3.12 An important reason why the landscape quality has not deteriorated to any major extent is the existence of some large Estates who manage substantial areas of land and have in most part retained the integrity of the landscape. These Estates are now actively carrying out management and conservation work to reverse the deterioration in quality where this has occurred. The extensive tree

and hedge-planting projects throughout the Rother Farmlands is an example of this.

4. Recent Initiatives in Countryside Management.

4.1 There is now a very high awareness of the need for protecting and enhancing the character of the countryside. This is recognised at all levels from central Government through Planning Policy Statements and Local Authorities emerging Local Development Frameworks through to implementation by way of projects such as Environmental Stewardship.

4.2 A number of initiatives have been introduced in recent years which are reducing and in many cases reversing the pressures that existed between 1960 and 2000, most of which are designed to protect and enhance the visual quality and the biodiversity of the countryside.

4.3 The following identify the major changes in policy, awareness and management initiatives which are currently resulting in the understanding and active protection and enhancement of the valuable diversity of the countryside.

4.3.1 Landscape Character Studies.

4.3.1.1 In 1996 the Countryside Agency and English Nature carried out a Characterisation Study of England. Landscape Character is defined as a distinct recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse. Simply, landscape character is that which makes an area unique. Paying proper regard to the existing character of the landscape, informed and responsible decisions for their management and sustainable future landscapes can be made. West Sussex Landscape Character Assessment was

completed in 2005 and Land Management Guidance sheets for the Western Weald are currently in production.

4.3.1.2 Landscape Character Assessment (LCA) is a technique for looking at the components of the Landscape and understanding how the combination of these components differ from area to area to create landscape character areas. LCA is recognised by Government as a valued tool for decision making through Planning Policy Statements, which encourage Local Authorities to base policy and land use decisions on the understanding of our landscape. Its use is also wider and extends to the communities and land managers.

4.3.1.3 Landscape Character is one of the central aims of Environmental Stewardship and evidence of LCA studies being put into practice can be seen throughout the Weald and in particular within the Rother Valley.

4.3.1.4 A LCA of West Sussex was completed in 2003 and Land Management Guidance Sheets for each of the 42 Character Areas in West Sussex have now been completed. The Character work is now being disseminated to the major audiences within the County, in particular landowners and their advisors, Planning Officers and Parish Councils.

4.3.2 **Historic Landscape Character Studies.**

4.3.2.1 Historic Landscape Assessment seeks to identify and understand the historic development of the landscape.

4.3.2.2 Dr Nicola Bannister was commissioned in 2003 to produce Historic Landscape Characterisation (HLC) for the historic county of Sussex (East Sussex, West Sussex and Brighton

and Hove). The project is on target for completion in April 2008.

- 4.3.2.3 Characterisation technique records individual fields and plots of land and assigns them a type based on the historic character present today. This digitisation is only part of the process and analysis of the data shows how the landscape has changed over time , where there are areas of particular value, and equally where change can take place.
- 4.3.2.4 The HLC study has confirmed that that the whole of West Sussex has depth of landscape history and this is reflected in varying degrees in today's landscape.
- 4.3.2.5 The HLC data is currently used in the Environment Group to inform advice on planning applications, Environmental Stewardship schemes and other land-use planning issues.

4.3.3 Hedgerows Regulations.

- 4.3.3.1 Hedgerows are protected by the Hedgerows Regulations 1997. Under the regulations, Local Authority permission is required before removing hedgerows that are over 30 years old and contain certain plant species.

4.3.4 The South Downs Joint Committee.

- 4.3.4.1 The Sussex Downs Conservation Board in East and West Sussex was set up in 1990. In 2005 it amalgamated with the East Hampshire AONB to form the South Downs Joint Committee. The main objective of the both Project's has been to protect, conserve and enhance the natural beauty of the AONB's.

4.3.4.2 Whilst the maintenance and enhancement of the existing quiet and informal recreation facilities is a valued objective, the main focus of its work has been to raise the awareness and importance of the natural beauty of the area by promoting this through working with landowners and the communities. This work has built on the activities formerly carried out by West Sussex County Council.

4.3.4.3 Much has been achieved since the Project started. Two schemes in particular within the western Weald are i) the Sussex Wealden Greensand Heath Project which is a project formerly funded by lottery funding and recently through High Level Stewardship and ii) the Rother Valley Project.

i) Sussex Wealden Greensand Heath Project:

Despite being an important part of our natural heritage more than 80% of the heathland in West Sussex has been lost. Heathland is an internationally important habitat supporting rare wildlife.

The Sussex Wealden Greensand Heath Project, a partnership project led by the South Downs Joint Committee, has lottery funding to help conserve and restore heathland in the county, and existing heathland has benefited from sympathetic management. Work is now continuing through higher level Environmental Stewardship grants.

ii) The Rother Valley Project.

This conservation project seeks to conserve and enhance the landscape and wildlife within the Rother Valley. The project works with Farmers and Landowners to integrate landscape and conservation objectives with commercial businesses to promote sustainable land management.

Whilst this project has now terminated, a considerable amount of survey work and research has resulted in an awareness of the problems within the area and guidance for future management.

4.3.5 Environmental Stewardship.

4.3.5.1 ES is a new agri-environment scheme which provides funding to farmers and other landowners for delivering effective environmental management on their land. The scheme is intended to build on the success of the Environmentally Sensitive Areas and Countryside Stewardship Schemes. It was introduced in March 2005 following the recommendations of the Curry Commission that a 'broad and shallow' agri-environment scheme should be developed to complement the previously narrowly focused approach, and the 2002-2004 Agra-Environment Review.

4.3.5.2 This revised Environmental Stewardship scheme is based on earlier schemes namely, Country Stewardship and Environmentally Sensitive Areas. Grants are offered to farmers and landowners to farm in ways which help wildlife, protect the countryside and preserve historic features. These can be achieved within the economic workings of the farm.

Its objective is as follows:

Conserve wildlife (biodiversity)

Maintain and enhance landscape quality and character

Protect the historic environment and natural resources

Promote public and understanding of the countryside

Natural resource protection

4.3.5.3 There are three elements to this new scheme;-

Entry Level Stewardship (ELS) – farmers are free to choose from a national menu of options which they consider appropriate to their circumstances and is open to all landowners.

- Organic Entry Level Stewardship (OELS) – is similar to ELS but is designed to encourage conversion to organic management and production to meet an increasing demand for organically produced food.
- Higher Level Stewardship (HLS) – is actively targeted towards land of particular environmental value and is a competitive scheme under which only those applications assessed as delivering the best outcomes are selected.

4.3.6 **The West Weald Landscape Project**

4.3.6.1 This is a partnership project led by the Sussex Wildlife Trust which works to promote integrated land management of a viable and enhanced landscape in the West Weald

4.3.6.2 The Low Weald of West Sussex is a diverse medieval landscape of woodland, glades and other wild-life rich habitats. It is one of the most wooded areas of the country with one third of the area covered by woodland, two thirds of which is Ancient woodland dating back many centuries.

4.3.6.3 The West Weald Landscape Project is led by the Sussex Wildlife Trust in partnership with amongst others, WSSC. The aim of the project is to enhance the area through an integrated landscape scale approach to achieve improved condition of the natural environment.

4.3.6.4 The Project Area follows very closely the County Councils Landscape Character Area's Low Weald 2, 'North-western Low Weald' and Low Weald 3, 'the Upper Arun Valley'.

4.3.7 **The Weald and Downland Ancient Woodland Survey.**

4.3.7.1 Since 2003 there has been an ongoing project inside the South East to revise the Ancient Woodland Inventory, first produced by the Nature Conservancy Council and its successor English Nature in the mid- 1980s.

4.3.7.2 The Ancient Woodland (AW) survey of West Sussex was completed in the mid 1980s. The study was carried out on woodland over 2 hectares. There are many areas of woodland in the western Weald below 2 hectares. A study in Mid Sussex of Ancient Woodland in Mid Sussex was carried out in 2004 and as a result the proportion of AW increased by some 50% within the District. To complete the coverage of West Sussex, the County Council in partnership with Natural England and the Forestry Commission are currently carrying out a similar study of Chichester, Arun and Horsham District.

4.3.7.3 The importance of Ancient Woodland is now widely accepted and management can focus on careful perpetuation of these sites. It is expected that an increase of recorded AW will be similar to that of Mid Sussex.

4.3.8 **Landscape Conservation Grants. (West Sussex County Council)**

4.3.8.1 WSSC have been providing Conservation Grants to farmers and landowners since 1974, assisting in many projects including tree planting, hedge planting, hedge-laying, coppicing, meadow management and pond restoration. Much has been achieved over the years as can be seen with the extensive tree and hedge planting on the Leconfield and Cowdray Estates, work that has continued with Environmental Stewardship Grants in recent years.

4.3.8.2 Grant aid peaked in the late 1980's following the 1987 and 1990 storms when a considerable amount of Government monies were administered by the County on behalf of the Countryside Commission (now Natural England).

4.3.8.3 In recent years other initiatives have come into play so WSSC grants now focus on areas of conservation which fall outside of other initiatives and for those who do not wish to carry out large scale projects.

4.3.8.4 Much has been achieved over the years including extensive tree and hedge-planting schemes on both the Cowdray and Leconfield Estates within the Rother Farmlands. This work is now continuing through Environmental Stewardship. Hedgerows are now dominant features in the Rother valley as can be seen at Tilling ton and elsewhere.

5. Re-designation of the western Weald AONB

- 5.1 The western Weald contains a wide variety of landscapes and habitats. The importance of these assets is widely recognised. It is therefore important that they retain AONB status following revocation of the existing AONB status and designation of a chalk only National Park. It is also essential that re-designation occurs concurrently with the revocation of the current AONB so as to afford continuity of protection.
- 5.2 The Weald landscapes occur to the north of the chalk scarp, and extend northwards into Surrey. There are two types of Wealden landscape which make up the non chalk area of the existing AONB boundary:-
- Sussex Wealden Greensand –characterised by a series of Greensand ridges, covered by a mosaic of woodland, plantation, river valleys, sandy arable farmland and heathland.
 - Low Weald - This has a more low-lying, gently undulating clay landform. It is characterised by an intricate mosaic of small broadleaved woodlands, ancient shaws, mixed woodland plantations, dense hedgerows and small medium sized fields. The area also contains a dense network of narrow rural lanes and numerous rivers and streams which all issue into the River Arun.
- 5.3 These Wealden landscapes are also characterised by settlement, which gives a marked contrast with the remote and empty Downs to the south.
- 5.4 There is ample precedent for AONB designations to abut National Parks - for example, Howardian Hills AONB and the North York Moors; the Tamer Valley AONB and Dartmoor National Park. Such designations recognise the distinctive qualities of the landscapes to

be protected whilst acknowledging that appropriate protection can and should be afforded by different measures. The occurrence of adjacent, different, designations also recognises that NPs and AONBs have different qualities, meeting different statutory criteria. The NP areas need to have natural beauty of a character providing opportunities for open air recreation of NP quality. AONBs have the cultivated character of more intensively managed farmland. It is the assertion of Chichester District and West Sussex County Council that the relationship between the proposed South Downs and the proposed re-designated Western Weald AONB illustrates a similar relationship.

6. Conclusion.

- 6.1 The Councils respectfully disagree with the conclusion of the Assessor's landscape assessment of the Rother valley. Any deterioration in quality is in our opinion considerably less than stated in Section 2 of the Assessor's supplementary report in Annex B.
- 6.2 We acknowledge that major pressures have had some impact on the character of the Western Weald particularly in the Rother Valley, this largely due to agricultural intensification. This does however represent a small proportion of the Wealden section of the AONB, the majority of the western Weald remains of high landscape quality with minimal change over the last 40 years.
- 6.3 Many changes in character within the Rother Valley and Farmlands such as hedgerow removal and the introduction of a 400KV Power line, occurred prior to AONB designation. Where a reduction of visual quality has been experienced, largely due to the introduction of more modern farm buildings and housing development adjacent to towns and villages, it is localised.

- 6.4 In areas where deterioration has taken place, there have been considerable efforts to halt and reverse this deterioration of character and there are many examples where restoration of features and active management to restore and perpetuate existing character, are now having a significant impact.
- 6.5 The Councils contend that where loss of quality of the western Weald has taken place, this has now been halted and in these areas any decline in quality are currently being reversed. They therefore consider that any suggestion that the quality of this area has diminished to such extent as to question its validity for re-designation is quite wrong. It is essential that any existing AONB which may fall outside of a chalk only National Park retains AONB status.
- 6.6 The Councils consider that it is essential that re-designation of the western Weald AONB runs in parallel with the designation of a future National Park to ensure that there is no period of time that the area is without protected status.
- 6.7 For reasons stated elsewhere in evidence, the Councils consider that the non-chalk landscapes including the western Weald do not merit National Park status. However they consider that they are of sufficient landscape quality to be included in an AONB.

.

.