

1115/1/2



SOUTH DOWNS NATIONAL PARK

PUBLIC INQUIRY

TOPIC 5
THE STATUS OF AONB LAND

WRITTEN STATEMENT

SUBMITTED ON BEHALF OF
EAST SUSSEX COUNTY COUNCIL

Introduction

1. East Sussex County Council has informed Defra of its concerns regarding the status of AONB land excluded from the proposed South Downs National Park (pSDNP).
2. In its letter of 29 August 2007 submitted as part of its representations, the County Council;
 - brought to Defra's attention that whilst the Inspector's recommendation not to confirm the revocation order was logical in respect of the western weald, it would leave a number of small parcels of land designated as AONB in East Sussex; and
 - requested that, in the event of the Inspector's boundary recommendations being accepted by the Secretary of State, a targeted revocation order should be confirmed to address the issue.
3. This written statement intends to put before the Inspector the County Council's position on the designation order boundary, what this means for those sections of AONB excluded from the pSDNP and how they should be treated.

ESCC's view on the Designation Order Boundary

4. The County Council in its response to the consultation on the designation order boundary in 2002/03 raised objection in respect of the exclusion of land North of Village Way, Falmer. Thus the formal position of the County Council remains one which is generally supportive of the designation order boundary.
5. The terms of reference of the 2007 consultation on, inter alia, the proposed revisions to the boundary specifically excluded comments on proposed deletions with the exception of the realigned boundary at the western weald. Accordingly the County Council did not seek to review its formal position on the boundary, other than to object to the proposed addition at Wilmington and support, with qualification, the proposed addition at Newhaven.

Revocation

6. The Inspector's boundary recommendations have significant implications for the nationally designated landscape of the western weald. This large tract of AONB landscape in West Sussex/Hampshire would be de-designated if the recommended boundary is accepted by the Secretary of State and the revocation order confirmed. Although the Inspector's conclusion that the revocation order should not be confirmed if the boundary is accepted makes sense for the western weald, it would result in small fragments of AONB land remaining in East Sussex. These residual parcels of land would be difficult to manage, require separate policy treatment and create confusion with the public.
7. The County Council would not wish to see such a confusing outcome and urges the Secretary of State to ensure that an appropriate, targeted revocation order is confirmed to address these anomalous parcels of land in East Sussex.

AONB land excluded from the pSDNP

8. Notwithstanding the need to ensure that de-designation is targeted and occurs in parallel with designation of the National Park, concern is expressed at the lack of justification for the boundary around Lewes which excludes AONB land on its periphery.
9. Mindful of the terms of reference of last year's pSDNP consultation, the County Council has not formed a view on proposed deletions.
10. However, it is evident that sections of AONB on the periphery of Lewes have been caught up within the definition of the urban area and consequently excluded from the pSDNP. The justification for this is given at paragraph 7.377 of the Inspector's Report which states that in the absence of an alternative boundary proposed by objectors, the Inspector with assistance from the Landscape Assessor has defined the boundary around Lewes.
11. Whilst proposed exclusions of AONB land from the pSDNP elsewhere in East Sussex are supported by a rationale in the Inspector's report, this is not evident in respect of the periphery of Lewes.
12. Given this lack of justification, the County Council requests that the Inspector reconsider the proposed amendments to the designation order around Lewes and include AONB land on the periphery of the town, currently excluded, within the National Park.