

South Downs National Park Public Inquiry  
(Re-opened)

# Public Opinion

## Supporting Statement

*by*



April 2008

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## 1 Introduction

- 1.1 The South Downs Campaign (SDC) submits the following evidence to help clarify the various claims of public support for and against a South Downs National Park.
- 1.2 The SDC is a network of organisations working for the best possible South Downs National Park, representing 145 national, regional and local groups and organisations<sup>1</sup>.
- 1.3 This submission follows a previous submission to the inquiry by the SDC on the popularity of the National Park which remains relevant<sup>2</sup>. As far as the SDC is aware this was the only substantive evidence submitted to the first part of this inquiry on public opinion.
- 1.4 The SDC must stress that it does not suggest that public opinion should play a part in the designation of a National Park. While consensus as to the suitability of a general area for designation is a factor to consider, it is no more than that. That said, issues of public opinion were raised first by the Landscape Assessor and then by the Inspector and therefore they are examined in more detail here.

## 2 Landscape Assessor’s Comments on Public Opinion

- 2.1 In a section of his main report entitled ‘consensus’ the Landscape Assessor states that<sup>3</sup>:

*“I agree that land should not be excluded, simply to reflect more accurately the title of a National Park. It appears that in the past, however, the Weald has not generally been considered to form part of the same extensive tract as the chalk downland. On the other hand, there is a long history of support for the designation of the chalk downland as a National Park. This consensus should, I believe, be a significant factor in identifying land for designation. I conclude that, in coming to the view that the Weald, ‘Coastal Lowlands’ and chalk downland constitute a ‘valuable assemblage of classic English landscapes’ that merits designation, the Agency has not given sufficient emphasis to the long-held support for a National Park consisting of **chalk downland** alone.” [his emphasis]*

- 2.2 The last sentence of this quote was repeated in his summary conclusions (paragraph 7.19).
- 2.3 Prior to coming to this conclusion the Landscape Assessor acknowledges that very few respondents (only 13%) to the Countryside Commission’s 1998 consultation favoured an area which only included the chalk hills for management by any future ‘South Downs’ body<sup>4</sup>.

<sup>1</sup> SDC Updated Biography – Inquiry Document No: #1147/0/1

<sup>2</sup> Paragraph 4.2, SDC Support for a South Downs National Park – Inquiry Document No: 3275/3/1

In particular, see Annex 6, Public Support for a South Downs National Park – Inquiry Document No: 3275/3/3

<sup>3</sup> Paragraph 6.129, Annex A, CD #3

<sup>4</sup> Paragraph 6.121, Annex A, CD #3

2.4 Later on in his report<sup>5</sup> when considering the consultation process he states that:

*“...I consider that the informal consultation did provide an opportunity for comments on the policy and approach and note that the Agency received a small number of responses (less than 5%) from consultees who decided to object to designation in principle at this stage (CD27 page 8). But it seems that there is no reliable guide to the level of support or objection, because the Agency did not specifically ask at the time whether, in principle, the proposed National Park was necessary or appropriate.”*

2.5 The Landscape Assessor repeats his claim that there is no reliable guide to the level of support for a National Park in his summary conclusions (paragraph 7.35).

### **3 The Inspector’s Comments on Public Opinion**

3.1 The Inspector was clearly reliant on his Landscape Advisor when looking at issues such as consensus and the soundness of the consultation processes carried out by the Countryside Agency. It is also the case that because of the Inquiry procedures the Inspector may have received a distorted view of public opinion, from the relatively few ‘in principle’ objectors who spoke at the inquiry. Therefore, it is perhaps not surprising that the Inspector, in his covering letter to the Minister (CD #3), states:

*“...Many objectors argue that the proposed National Park does not satisfy the statutory criteria and purposes of designation...”*

*“...Many objectors argue that if there is to be a new South Downs national park it should not include non-chalk landscapes such as the Weald...”*

3.2 However, the SDC is disappointed that nowhere in his letter is there any mention to the far larger number of people who supported the principle of the South Downs National Park and registered that support during the consultation on the Designation Order in 2003<sup>6</sup>.

3.3 In paragraph 3.28 (Part I, CD #3) the Inspector states:

*“I have some sympathy... ...that the consultation arrangements did not specifically ask at any time whether, in principle, a South Downs National Park was appropriate and necessary. No reliable guide to the scale of “in-principle” objection to the PSDNP, or support for it for that matter, is therefore possible... ...at the end of the day many “in-principle” objections were lodged during the designation process...”*

3.4 In annex 1 (Part I, CD #3), the ‘in principle’ objectors are listed. In total, 109 individuals and organisations are listed as opposing a South Downs National Park.

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<sup>5</sup> Paragraph 6.229, Annex A, CD #3

<sup>6</sup> See paragraph 52, page 17, Natural England Position Paper 6: #1330/0/20 – of the 2220 responses to the South Downs National Park Designation Order, 2029 (94%) were in favour of a National Park, only 131 (6%) against

This total is close to the 131 ‘in principle’ objectors that Natural England found in its analysis to the Designation Order<sup>7</sup> responses.

- 3.5 In annex 2 (Part I, CD #3), the ‘in principle’ supporters are listed. In total, 1,300 individuals and organisations are listed as supporting a South Downs National Park. This however, excludes some 729 individuals and organisations that Natural England found<sup>8</sup> to be supporting the National Park, including the South Downs Campaign itself.
- 3.6 In his Part II report, the Inspector when commenting on the non-chalk landscapes states<sup>9</sup>:

*“...it is my impression that many of those who oppose the PSDNP might have supported the concept if it had been promoted on that basis...”*

- 3.7 Later on in his conclusions he states<sup>10</sup>:

*“...Not least he [the Landscape Assessor] considers that the decision to include the Weald and the coastal lowlands departed from the long standing consensus regarding the general extent of a possible South Downs National Park...”*

## **4 Support for a South Downs National Park**

### **4.1 Position During the First Part of the Inquiry**

- 4.1.1 As far as the South Downs Campaign is aware, no other body provided any significant evidence on public opinion at the first inquiry. Therefore the only evidence before the inquiry was the results of the Designation Order consultation and the SDC’s evidence<sup>11</sup>.
- 4.1.2 There were nearly 6,000 responses to the Designation Order consultation showing overwhelming support for the National Park amongst the 2,200 responses that commented on the principle<sup>12</sup>. Apart from the fact that this in itself is an indication of strong support for a National Park amongst the public, the very small number of objectors in comparison is also a sign that this is not an issue to which people generally object. Quite often, when changes are proposed, whether they are for new services or developments, it is the voices of objectors who are heard most strongly.
- 4.1.3 Yet, this clearly hasn’t happened with the South Downs National Park. This supports the SDC’s view that the opposition to the National Park is limited to that which is emanating from a small number of local authorities, special interest groups and individuals, while the majority of the public firmly backs the proposals.

<sup>7</sup> Paragraph 52, page 17, Natural England Position Paper 6: #1330/0/20

<sup>8</sup> 2029 (94%) responses were in favour of a National Park - paragraph 52, page 17, Natural England Position Paper 6: #1330/0/20

<sup>9</sup> Paragraph 2.3, Part II, CD #3

<sup>10</sup> Paragraph 2.59, Part II, CD #3

<sup>11</sup> See Annex 6, Public Support for a South Downs National Park – Inquiry Document No: 3275/3/3

<sup>12</sup> See paragraph 52, page 17, Natural England Position Paper 6: #1330/0/20

- 4.1.4 It is also a fact that the South Downs Campaign was a growing network of 100 organisations by the end of the previous part of the inquiry process<sup>13</sup>. It is noteworthy that there was no corresponding co-ordinated campaign to oppose it.
- 4.1.5 However in addition, the SDC notes with concern that the Landscape Assessor appears to have ignored the evidence that the SDC submitted to the previous part of this inquiry on public support. Here the SDC reported on four different local authority surveys, plus several other consultations and public meetings. One of the most extensive local authority consultations was in Arun District (in West Sussex). Here 718 local people responded to the consultation with the result that nearly 80% supported a National Park<sup>14</sup>.
- 4.1.6 The SDC also reported on two surveys of public opinion that the Ramblers' Association commissioned from National Opinion Poll Solutions (NOP) in 1998 and 1999. The 1998 NOP survey interviewed 1005 people nationally and a further 297 in the Meridian and Carlton / LWT regions, designed to be a representative sample of all adults. Although the SDC does not have the details of the 1999 poll, other than the result, it is likely that it was carried using a similar methodology. In both instances support for the National Park ranged between 77 – 84% of those questioned<sup>15</sup>.
- 4.1.7 Overall, the SDC is concerned with the way that the Landscape Assessor appears to have overlooked the evidence placed before him of strong public support for a National Park. This must seriously call into question his conclusions on public opinion.

## 4.2 New Evidence

- 4.2.1 Since the close of the previous inquiry, there has been some new evidence on the popularity of the National Park, including one piece of evidence that was not presented to the inquiry but was known at the time. This was a 21,000 signature petition submitted to Parliament, in March 1999, by David Lepper MP for Brighton Pavilion (see Annex 1 attached). The petition called for a National Park style body to succeed the Sussex Downs Conservation Board.
- 4.2.2 New evidence since the inquiry closed in March 2005 consists of a BBC Politics Show (South East) vote in February / March 2007 where around 1,600 people voted. The results showed that 95% supported a South Downs National Park while only 5% opposed it (see Annex 2 attached). While not a scientific survey, it is another barometer of public opinion which backs up previous surveys and opinion polls. The result was broadcast on the BBC Politics Show South East programme on Sunday, 4 March 2007.

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<sup>13</sup> Revised SDC Membership List – Inquiry Document No: 3275/1/4

<sup>14</sup> See Appendix 3, Annex 6, Public Support for a South Downs National Park – Inquiry Document No: 3275/3/3

<sup>15</sup> See Paragraph 5.2, Annex 6, Public Support for a South Downs National Park – Inquiry Document No: 3275/3/3

4.2.3 The other major new evidence on the popularity of the National Park lies in the continued growth of the South Downs Campaign. It now has 145 member organisations, nearly 50% more than at the end of the previous part of this inquiry. This is greater than the total number of recorded ‘in principle’ objectors<sup>16</sup>, which includes individuals. It is worth noting that only organisations can join the SDC, not individuals, making this statistic even more impressive. Also not included in this (SDC) total are bodies such as the National Trust, Hampshire County Council, East Hampshire District Council, Brighton & Hove City Council, Lewes District Council and many other organisations that support the National Park.

## 5 Support for a National Park Consisting of Chalk Downland Alone

### 5.1 Position During the First Part of the Inquiry

5.1.1 The Landscape Assessor acknowledges that the area covered by a National Park should not be altered to try and fit its name<sup>17</sup>, but then proposes just that. He also fails to provide any evidence that support for a National Park historically was premised on it only applying to the chalk downland. Indeed, he ignores the main evidence that he has from the Countryside Commission public consultation where only 13% of respondents favoured an area which only included the chalk hills for management by any future ‘South Downs’ body (see paragraph 2.3 above). It is therefore difficult to see how he can claim that there is a “*long-held support for a National Park consisting of chalk downland alone*” [SDC’s emphasis].

5.1.2 While there might need to be consensus for a National Park in a particular region or general area, that consensus does not have to extend to a tightly defined area which cannot be deviated from as suggested by the Landscape Assessor. For example, Northumberland National Park was expanded significantly northwards and did not stay focused on Hadrian’s Wall<sup>18</sup> as proposed by Dower and Hobhouse. Equally, Snowdonia National Park was not confined to Dower’s proposal, which centred on the Snowdonia range, but expanded significantly, more in line with Hobhouse’s boundary which covered roughly twice the area.

5.1.3 While the Landscape Assessor may have provided some evidence as to what the ‘South Downs’ are, this does not automatically translate, as he has assumed, to there being a consensus for only designating the chalk downland as a National Park (for which he provided no evidence).

5.1.4 The only other evidence available at the time was the responses to the Designation Order consultation. Again, this did not support the Landscape Assessor’s case as only 18 respondents proposed a chalk only National Park, while another five, including West Sussex County Council and Chichester District Council, had it as their fall-back position. By no stretch of the imagination could this be described as a consensus of opinion for a chalk only National Park out of nearly 6,000 responses.

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<sup>16</sup> See paragraph 3.4 above.

<sup>17</sup> Paragraph 6.129, Annex A, CD #3

<sup>18</sup> See Map 1, Annex D, CD 217

- 5.1.5 Also, and in sharp contrast to the Landscape Assessor’s claims, over 400 respondents supported the boundary in Section E, the wholly Wealden section of East Hampshire, with there being only a handful of objectors to particular areas being included. Therefore the conclusion to be drawn from the Designation Order consultation is that the vast majority supported the wider National Park boundary and hence supported the inclusion of the Western Weald.
- 5.1.6 The SDC would respectfully point out that, in the absence of any obvious evidence of what objectors might think, it is conjecture to suggest what might have been acceptable to them.

## 5.2 New Evidence

- 5.2.1 Since the previous inquiry, there has been new evidence on whether people agree with the proposal to exclude the Western Weald and various places within it from the National Park. The most obvious expression of public opposition to the exclusion of the Western Weald was the response to Defra’s consultation held in the summer 2007<sup>19</sup>. This was followed up by the petition lodged on the Prime Minister’s website calling for the Western Weald to be included in the South Downs National Park, while there has also been a local resident’s survey held in East Hampshire in October 2007.
- 5.2.2 In the first instance the public consultation over the summer 2007, saw some 2,022 responses. With duplicates removed, this total drops to 1,992<sup>20</sup>. Of this total the SDC estimates that directly or indirectly, around 1,260 (63% of the total) objected to the exclusion of the Western Weald. By this, the SDC means those people who directly stated that they objected to the exclusion of the Western Weald and those who objected to a specific part of it being excluded<sup>21</sup>. In stark contrast, only 30 people or organisations (1.5% of the total) supported the exclusion of the Western Weald. This is a very clear statement of public opinion.
- 5.2.3 Secondly in July 2007, the SDC lodged a petition on the Prime Minister’s website<sup>22</sup> stating: *“We the undersigned petition the Prime Minister to include the western Weald in the South Downs National Park”*. To date, over 4,250 people have signed the petition, making it the number one ‘live’ environmental petition on the website.
- 5.2.4 In October 2007, East Hampshire ran a residents survey, to which 1,161 people responded<sup>23</sup>. Within the survey there were two questions on the Western Weald with the results as follows:

*Thinking about how the District is evolving, how much do you agree or disagree with the following:*

<sup>19</sup> The consultation was held from 2 July – 24 September 2007

<sup>20</sup> Three submissions were missing and have not been analysed

<sup>21</sup> This total does not include those who objected to a part of the Western Weald being excluded but clearly did not support the Designation Order boundary, i.e. suggested some other boundary. Nor does it include those who just objected to the loss of AONB designation.

<sup>22</sup> See the petition and its signatures at: <http://petitions.pm.gov.uk/western-weald/>

<sup>23</sup> Results can be found on the East Hampshire District Council website (see question 26):

<http://www.easthants.gov.uk/ehdc/quicklinks.nsf/webpages/Residents+Survey>

*I am aware of the proposed changes to the National Park boundary*

- 51% were aware of changes to the proposed national park boundary
- 31% were unaware
- 19% were unsure

*I support the revised boundary*

- 19% supported the revised boundary
- 42% objected to it
- 39% were unsure

5.2.5 Bearing in mind that these were district wide results, including residents from areas well away from the PSDNP boundaries, this shows quite a lot of awareness of the proposed changes and a substantial level of opposition to the revised boundary which excludes the Western Weald.

## **6 Conclusions**

6.1 The SDC believes there was an adequate body of evidence available to the Landscape Assessor about the level of public support for a National Park that was not alluded to in his report. In particular, he gave little or no materiality to the results of the Designation Order consultation or to the evidence submitted by the South Downs Campaign. When this information is combined with new evidence that the SDC is submitting in this proof, it provides strong evidence of overwhelming public support for a South Downs National Park.

6.2 On the more focused question as to the extent of the National Park, again the overwhelming support for the Designation Order should have given a strong indication of the support for the wider National Park boundaries. The Landscape Assessor ignored this extensive opinion and also assumed a consensus that the National Park should be confined to just to the chalk hills. He had no evidence to back up this assertion. In effect, he bound the South Downs National Park by its name despite saying that the name was only a shorthand description.

6.3 The Inspector also raised the issue that if the chalk only National Park had been on offer more objectors might have signed up to it. However, the SDC respectfully suggests that there appears to be no obvious evidence to support this. If there was any doubt, the results of the consultation last summer should have swept those away. This has also been reinforced by the SDC's online petition about the exclusion of the Western Weald and the survey carried out by East Hampshire District Council. Therefore there is no reason not to report to the Minister this time round that there is strong support for a South Downs National Park and strong support for the inclusion of the Western Weald within it.

# **Annex 1**

**Extract from Hansard  
(House of Commons)**

**4 March 1999**

## PETITION

### South Downs

7.34 pm

**Mr. David Lepper (Brighton, Pavilion):** I am pleased to have the opportunity to present a petition initiated by Friends of the Earth, south-east office, which is based in my constituency. The petition has 21,000 signatures.

The petition states:

To the House of Commons.

The Petition of Friends of the Earth (South East Office) and others

Declares that they are concerned about the sustainable long-term future of the South Downs.

The Petitioners therefore request that the House of Commons establish a democratically elected National Park style body to succeed the South Downs Conservation Board, with strong planning powers to protect the Downs from damaging new development and to control and manage the huge recreational pressures on the Downs.

And the Petitioners remain, etc.

*To lie upon the Table.*

**4 Mar 1999 : Column 1323**

The extract above can be viewed online at:

[http://www.publications.parliament.uk/pa/cm199899/cmhansrd/vo990304/debtext/90304-38.htm#90304-38\\_spnew0](http://www.publications.parliament.uk/pa/cm199899/cmhansrd/vo990304/debtext/90304-38.htm#90304-38_spnew0)

## **Annex 2**

### **BBC Politics Show Online Vote**

**February / March 2007**

## Contents of an email from Julia Heathcote to Chris Todd, SDC Officer, on 7 March, 2007

You can use the vote date - please see below – you must refer to it as a VOTE not a POLL!

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**From:** Andrew Jeffrey [mailto:andrew.jeffrey@bbc.co.uk]  
**Sent:** 07 March 2007 10:54  
**To:** Henry Swan; Julie Heathcote  
**Cc:** Sue Wilkinson  
**Subject:** RE: BBC Politics Show Poll

Hi Julie...

[http://newsvote.bbc.co.uk/1/hi/programmes/politics\\_show/6381601.stm?dynamic\\_vote=ON#vote\\_6381601](http://newsvote.bbc.co.uk/1/hi/programmes/politics_show/6381601.stm?dynamic_vote=ON#vote_6381601)

The number of votes cast is actually on the vote panel itself... 1,583 - so anyone can access it. But it must be born in mind that it is ONLY a barometer of opinion and is NOT scientifically conducted as one would expect from say an Ipsos/Mori poll - this is just a "for interest sake" vote - not a poll.

**Andrew C Jeffrey**  
Online Producer | BBC One | Politics Show  
t: 0191 244 1428 | m: 07960 535357 | off m: 07739 300143 | f: 0191 232 4959  
andrew.jeffrey@bbc.co.uk | acjeffrey@gmail.com  
BBC | Barrack Road | Newcastle upon Tyne | NE99 2NE

The website address listed in the email above actually takes you to the voting panel which asks you the question whether you support the National Park or not. To see the results of the vote you need to use the following website address, although this doesn't tell you how many people voted: [http://news.bbc.co.uk/1/hi/programmes/politics\\_show/6403369.stm](http://news.bbc.co.uk/1/hi/programmes/politics_show/6403369.stm)