

OPENING STATEMENT: POSSIBLE NEW BOUNDARY

by

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on behalf of

SOUTH DOWNS CAMPAIGN

Ref: SDC Proof of Evidence

Inquiry Document No: #1147/5/1

17 April 2008

As I suspect you may possibly have gathered from our proofs of evidence, the SDC has objected strongly to the possible new boundary between Petersfield and Pulborough. Our objections are, as set out in our proof, not just with the boundary as drawn but with the principles underlying it. I'll return to the reasons for that in a moment. But I emphasise the point at the outset so that it is clear that the SDC would object to any other line drawn within the designated boundary that is based on what we regard as flawed principles.

A further point I would like to state now at the outset of the session. There have only been two lines drawn for a boundary in the Western Weald that have been open to public scrutiny. The first was the designated boundary. The SDC does not think that this Inquiry has properly taken account of the amount of consultation that was undertaken by the Countryside Agency on this boundary. It began on 26th November 1997, at the Area of Search stage, and it continued with the two formal consultations on the Draft Boundary. Defra then consulted on the Designation Order. But that was the tip of the iceberg. There were exhibitions, public meetings, road shows, meetings with Parish Councils, and meetings with interest groups who asked for speakers to explain the proposals. Many Parish Councils and other bodies arranged their own briefings, and support was provided to them too if it was asked for. It is hardly surprising therefore that the proposals received the degree of support that they did.

The second public consultation was that held last year on the possible new boundary. You already know the outcome of that: a resounding rejection of what was on offer. The SDC is not aware of any further complete, as opposed to partial, boundary that has been presented to this re-opened Inquiry for public scrutiny.

It seems to the SDC therefore that whatever the merits of the boundary we are discussing today may be, it is the only one we have got should the Secretary of State choose to reject the designated boundary. That is, without another

consultation and undoubtedly another public inquiry. For those of us who are involved in the management of the area that is a truly awful prospect.

My third point relates to the A3 corridor. You recommended, based on the advice you were given, that the A3 corridor should be excluded from the National Park even if the Western Weald was not. If that recommendation were to be accepted, it would result in an eastern boundary to that section which would have received no public scrutiny at all.

Turning to the reasons why we reject the principle of the possible new boundary, these are set out in our proof of evidence. In brief, we have concerns that the Landscape Assessor made a number of assertions, some very wide ranging, others less so, but all of them without providing supporting evidence. We believe that this cannot form the basis of a decision especially given Mr Justice Sullivan's criticisms, in his Meyrick Judgment, of the New Forest Inspector for reaching a decision without providing supporting facts.

We do not accept the concept that linkages have to be shown between the Wealden landscapes and the Chalk in order to justify inclusion of the Western Weald in the National Park. However, if linkages are to be considered important then we reject the notion that only visual linkages exist and that these are found only close to the Chalk. We believe the Landscape Assessor's reasoning is open to question on this point.

We believe the Landscape Assessor applied more stringent tests in respect of transitional landscapes, features of historical, scientific or architectural value and the inclusion of settlements than the Natural England boundary-setting rules dictate.

We believe too that, in assessing the Weald on factors like power lines and nettle-strewn footpaths, factors which were not applied to the chalk, the Landscape Assessor has introduced inconsistency between the approaches that he has applied to the two landscapes.

Underpinning all our objections is of course our rejection of the concept that core character is somehow necessary to the assessment of natural beauty when there is a glaring absence of any such concept in the legislation.

We set out, in para 9.1 of our proof, the consequences of this and other shortcomings in the Landscape Assessor's approach for the basis on which the possible new boundary was drawn. This should not be read as a criticism of the way the boundary line was drawn. We do not share WSCC's view that Natural

England's work was in any way professionally lacking. Having tried to follow the Landscape Assessor's logic ourselves, we have sympathy with anyone trying to draw a line based on it. However, we have to say that it is a line that would have any visitor to the area scratching their heads to understand why it is drawn where it is. It very clearly fails the test of simplicity.

We have ourselves examined the boundary on foot, field by field. We do not propose to repeat that exercise here but instead have raised a number of specific issues in our proof to illustrate our concerns. Some of these, and some other issues, we would like to discuss with Alison Farmer Associates if that is acceptable to you. We are of course happy to answer any questions you might have yourself.