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Liss Parish Council

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Jonathan Shaw MP
Parliamentary Under Secretary of State and Minister for the South East
Defra
Nobel House
17 Smith Square
London
SW1P 3JR

20th September 2007

Dear Minister

South Downs National Park

I refer to the Parish Council's letter of 11th July and welcome your decision in the light of our and other representations that the deadline for representations to the further consultation should be extended to 24 September. I regret, however, that we have had no response to date to our request that the scope of the consultation should be widened. Sir Martin Doughty, to whom we copied our letter, has written to say that he supports our view.

I attach our responses to the four issues put forward by defra.

The Council also has concerns that fall outside the four questions put.

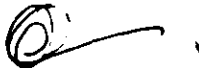
1. The Inspector has suggested that any parts of the current AONBs, which fall outside the National Park, might become part of a separate AONB or attached to the Surrey Hills AONB. The council does not understand the logic of the Surrey Hills proposal since it already includes both chalk and wealden landscapes to which the Inspector has objected in the case of the South Downs. Of greater concern is to understand the processes that would have to be gone through to implement either alternative? Our understanding is that the revised AONBs would have to go through the same consultation process, including, possibly a public inquiry, as a new AONB/National Park. The Council is also concerned to know what protection could be afforded to the area while the consultation was in progress

2. The Landscape Assessors report on the Rother Valley, Petersfield, Liss and the A3 corridor, including Woolmer and Longmoor is at variance with previous landscape assessments of the area and where they are referred to appear to be highly selective. Moreover subsequent assessments are at variance with his findings. Can we be assured that there will be the opportunity to scrutinise this report that did not form part of the Public Inquiry?

3. The Inspector has referred to the planning load on the National Park if the public inquiry boundary is retained. Planning arrangements have never been a determining factor when previous National Parks have been established and we would welcome an assurance that past practice will prevail this time. The Council considers that a satisfactory system of delegation could be established.
4. The Inspector has put forward a third option under which only the A3 corridor would be removed. No specific boundary has been proposed. We would wish to be consulted on the detail if this alternative remained on the table.

I am copying this letter to Michael Mates MP, to Sir Martin Doughty, to the Chairman of Hampshire County Council and East Hampshire District Council and to Kim Gunningham, Sponsorship, Landscape and Recreation (National Parks) Division at Bristol.

Yours sincerely



Mr R Bowery
Clerk to the Council

LISS PARISH COUNCIL RESPONSES TO DEFRA QUESTIONS

You asked for responses to four questions. Liss Parish Council's responses are as follows.

- (i) *Any implications for the Designation Order (as varied by the Variation Order) arising directly as a result of the revised National Park legislation – amendments to the National Parks and Access to the Countryside Act 1949 made by the Natural Environment and Rural Communities (NERC) Act 2006, sections 59 and 99*
- Liss Parish Council does not believe there are any.
 - It notes with pleasure that under the revisions to the legislation Natural England may take into account wildlife and cultural heritage when designating a National Park boundary. It regrets that the boundary now proposed pays little or no attention to the wildlife, cultural heritage or cultural linkages between the Weald and chalk hills.
 - The Parish Council also notes that there is nothing in the new legislation to support the Inspector's contention that a national park should be predominately of one character type.
 - The Parish Council believes that the revisions give support to the case for the previous boundary drawn up by the then Countryside Agency.
- (ii) *Any implications for the Designation Order (as varied by the Variation Order) arising directly as a result of the High Court and Court of Appeal Judgements on the challenge by Meyrick Estate Management Ltd relating to the New Forest National Park*
- In the view of the Parish Council there are none.
- (iii) *The possible alternative boundary from north of Petersfield running east across to Pulborough*
- The Parish Council strongly objects to the new boundary and the proposed exclusion of the western Weald, in particular to the proposed exclusion of Liss, Petersfield, the A3 corridor, Woolmer and Longmoor. In its view the area fully meets the criteria for national park status, especially the natural beauty criterion. It notes that in correspondence with the Parish Council, Sir Martin Doughty has said that he cannot support the revised boundary drawn up by Natural England under instructions from defra.
 - There is overwhelming local support for the inclusion of the western Weald in the National Park. Only two objections were submitted which affect the Parish. Both were from developers who had options on land within the Parish. Neither objected on the grounds on which it is now proposed that the western Weald should be omitted.
 - The landscape assessment on which the Inspector partly based his recommendations was not scrutinised in public and went beyond the evidence provided to the Inquiry. The Council considers that many of the conclusions reached by the landscape assessor are deeply flawed. In the interests of natural justice the Public Inquiry should be re-opened to hear new evidence on the boundary and the exclusion of the western Weald that was not available to the original inquiry.
 - The Inspector concludes that the Weald is of a different landscape characteristic to the Chalk Ridge and should therefore be omitted from the National Park. We would wish to submit new evidence not available to the Public Inquiry on the strong cultural links between the Weald and the chalk. It is significant that the 2 existing AONBs recognise the linkage by including both chalk upland and the associated wealden areas within their

boundaries. Many of the iconic views of the Downs are from the chalk uplands over the Weald.

- The Inspector claims that the A3 corridor is not up to the standard demanded by a National Park. There is no evidence that the Upper Rother Valley has been significantly degraded since the East Hampshire AONB was created in the 1960s. The Council does not accept that the A3 has significantly degraded the area. It was designed and landscaped to cause minimal noise and visual intrusion on the area. Traffic impact is greater in other areas which will lie within the Park. The Council would wish to supply new supporting evidence not available to the Public Inquiry.
- The Farmland and woodland in the Upper Rother Valley are said to be degraded. The Council has evidence not available at the Public Inquiry to show that the field patterns remain little changed since the East Hampshire AONB was formed. The rural landscape is largely unchanged since the medieval period.
- The assessment takes no account of cultural heritage. One of the largest fields in the Upper Rother Valley, given as evidence of intensive farming, is the site of a large Roman village and villa. The Council would wish to provide new evidence not available to the Public Inquiry.
- The Assessor claims that residential and commercial development have adversely affected the townscape and given the area a suburban character. Liss is known as the "Hidden Village" because it does not impinge on the landscape. The Council have additional new evidence not available to the Public Inquiry.
- There are inconsistencies between the way the original boundary was set and that proposed in the Assessor's new boundary. The Council consider that a common standard should be adopted. Villagers have tried to test the new boundary but found it impossible to follow on the ground. Some features on which it depends are no longer in existence. Others make no logical sense and increase the impression that the boundary has not been properly tested on the ground. The original boundary had logic.

Woolmore/Longmoor

- Although largely outside the Parish of Liss, the inclusion of the 2 areas is strongly supported. They are both widely used by Liss residents and carry SSSI, SAC and SPA designations. There can be no doubt that they meet the natural beauty criteria. It is a haven for wildlife and the largest tract of heathland in Hampshire outside the New Forest. The Council continues to hold the view that the impact of the military use of the areas on recreational opportunities are overstated and has new evidence not available to the Inquiry to support this view.

(iv) *Possible additional areas recommended for inclusion within the proposed SDNP.*

- The Council fully support the proposed areas for addition.