



## **Hearing Statement**

Addition 13 (Newhaven)

937/1/1

## South Downs National Park Inquiry

Addition 13 (Newhaven)

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Hearing Statement

on Behalf of

Newhaven Port & Properties Ltd

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January 2008

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## 1. Introduction

- 1.1 This statement is submitted on behalf of Newhaven Port and Properties Limited to object to the addition of land at Newhaven (Addition 13) within the proposed South Downs National Park (Designation) Order (2002). We object to this addition on the grounds that it does not meet the criteria for National Parks as set out by the Countryside Act (1949) as later revised by the Environment Act (1995) and the Natural Environment and Rural Communities Act (2006).
- 1.2 In the Inspectors Report to the Secretary of State dated 31 March 2006 it was concluded that "Of the alternative boundaries put forward in respect of this land, I prefer the boundary identified by the District Council. This seems to take proper account of land allocations in the Lewes District Local Plan." However, the land included within the June 2007 Modifications Map encompasses the 'Eastside Business Area' allocation of the District Council. It is with the 2007 Modifications Map in mind that we make these objections as clearly it offers a significant threat to the development of Newhaven and the jurisdiction of National Parks. Lewis District Council are also submitting a statement objecting to the inclusion of the 'Eastside Business Area' (Appendix F).
- 1.3 The permission for the Port Access Road (PAR) has now been implemented and the road will be constructed. The Port Access Road (LW/99/1472) will run through the proposed addition (13) (Appendix A).
- 1.4 Newhaven is statistically the most deprived town within the district of Lewes. Unemployment within Newhaven is above the East Sussex average with 37% of unemployed people in Newhaven being out of work for more than 6 months. The declining manufacturing industry has been compounded in recent months by the announcement that Parker Per will be transferring 200 jobs away from Newhaven. According to the 2004 Census statistics,

you are more likely to live in an overcrowded house, or one without a bathroom or central heating than in any other part of Lewes District. The designated business park at Eastside offers a major development opportunity which can boost the towns declining traditional industries. The port is strategically important for the manufacturing sector and provides a cross-channel link to France. The port is considered to be a high priority by the South East England Regional Assembly (SEERA) and the South East England Development Agency (SEEDA).

## 2. Statement

- 2.1 Addition 13 is a tract of land which runs between Newhaven and the residential area of Rookery Hill, incorporating a stretch of land to the north (forming part of the Lower Ouse valley), and Tide Mills and a shingle beach to the south. The proposed addition is largely bounded by developed land; to the north the A259 and the residential district of Newhaven; to the east Newhaven port and the industrial district of Newhaven; and to the west the residential area of Rookery Hill. The proposed addition is connected to the rest of the Proposed National Park via the chalk uplands to the north-east. This proposed designation encompasses much of the Eastside Business Area as designated by the Lewes District Council Local Plan (Appendix C).
- 2.2 Tide Mills village was originally erected in 1761, now derelict it is part of a long term project by the Sussex Archaeological Society and is considered to be a site of local and regional importance. It is therefore considered that this area is of an appropriate cultural heritage to merit inclusion within the National Park. Tide Mills is bounded by a railway track to the north. The shingle beach to the south of Tide Mills, by virtue of its natural beauty and opportunities for open area recreation, is also considered to meet the criteria for designation as a National Park. However, the designation of this area as a National Park relies on the adjoining land to the north to also merit inclusion.
- 2.3 The proposed addition is poorly related to the rest of the Downland landscape. It is located between two built up areas (Newhaven and Rookery Hill) and separated from the chalk Downland to the north by the A25. The planned business area and Port Access Road (now implemented) would further tighten the gap between Newhaven and Rookery Hill. Additionally, the northern section of the addition is relatively flat and gives unrestricted views to the built up area. The Port Access Road will be raised 600mm along its length and will also consist of public footpaths and cycleway, considering the flat nature of the area to the east this would be clearly visible. The

construction of the Port Access Road will further add to the intrusive nature of the cycle and footpath routes already in place. It is therefore considered that the A259 would represent the most clearly defined boundary between the northern chalkland landscape and the industrial/port area of Newhaven, as the Countryside Agency has submitted previously.

- 2.4 The land to the north of the railway track has previously been used for growing crops, however, it is now part of the Ouse Estuary Project. The Estuary Project is 3 phased environmental improvement initiative to help form a nature reserve. Phase 1 has now been completed and funds are being awaited to bring forward Phases 2 and 3.
- 2.5 The inspector in Paragraph 7.472 of his report declares that the newly formed habitats are not 'in landscape terms, of national or the finest quality' and that to achieve this quality, they would require further landscaping and maturation. The inspector goes on to state that there may be some funding uncertainty with regard to the Ouse Valley Project. Taking into account the proposed business area and the Port Access Road, it is likely that the landscape quality of this area is going to get worse before it gets better. Further to this, the maturation of the Ouse Valley Project could take a number of years, and may never be achieved if relevant funds are lacking. Therefore, to qualify this land as of national or of the finest quality before it is or can substantially be confirmed as such, seems to damage the integrity of the National Park

## Appendix A