

South Downs National Park Public Inquiry
(Re-opened)

Detailed Consideration
Of the
Possible New Boundary
between Petersfield and
Pulborough

Proof of Evidence

by



Campaign to Protect
Rural England



SOUTH DOWNS CAMPAIGN

Working for the best possible National Park

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1 Introduction

- 1.1 The South Downs Campaign (“SDC) submits the following proof of evidence on the possible new boundary between Petersfield and Pulborough.
- 1.2 The South Downs Campaign is a network of organisations working for the best possible South Downs National Park representing over 140 national, regional and local groups and organisations. This particular proof of evidence has been produced in partnership with a number of organisations, in particular the Campaign to Protect Rural England Hampshire and the Campaign to Protect Rural England Sussex.

2 Biography of Principal Witness

2.1 Margaret Paren

- 2.1.1 Margaret Paren is a Vice Chair of the South Downs Campaign.
- 2.1.2 She spent her career in public service, mainly in the Ministry of Defence but also in the Cabinet Office (Constitution Unit) and the National Audit Office as a Director of Value for Money Studies. She is a member of the Royal College of Defence Studies (1990). After taking early retirement she became involved in local community and environmental voluntary activities primarily centred on the South Downs.
- 2.1.3 She is a member of the East Hampshire District of CPRE and a Vice Chair of the South Downs Society. She is a holder of the CPRE Countryside Medal for her work on the South Downs. She is also a trustee of Community First East Hampshire (the umbrella body for the voluntary sector in East Hampshire).
- 2.1.4 She was a member of the Sussex Downs Conservation Board and the East Hampshire Joint Advisory Committee before they merged to form the South Downs Joint Committee, of which she has been a member since its inception in 2005 and she serves on its Executive Committee.

3 SDC Evidence

3.1 The SDC is submitting the following Proofs of Evidence that are directly relevant to the possible new boundary between Petersfield and Pulborough; these contain substantial new evidence not previously available to this Inquiry:

- #1147/1/1 - Implications of NERC Act 2006 and Meyrick judgements
- #1147/0/2 - Opening Statement
- #1147/7/1 - Recreational Opportunity in the Western Weald
- #1147/8/1 - Impact of Agriculture in the Upper and Lower Rother Valleys
- #1147/9/1 - Construction of the A3(T)
- #1147/10/1 - Petersfield
- #1147/11/1 - Liss
- #1147/12/1 - Settlements & Landscape Detractors in the Lower Rother Valley
- #1147/13/1 - Woolmer Forest and Longmoor
- #1147/14/1 - Wildlife of the Western Weald
- #1147/16/1 - Proof of Evidence related to Western Weald
- CD#46 Cultural History of the Western Weald

3.2 This proof of evidence should be read in conjunction with those listed above and with CD #10. It contains substantial new evidence, much of it of a detailed nature not previously available to this Inquiry. It draws on CD #14, the South Downs Integrated Character Assessment, which was not published at the time CD #3 Appendix B was written.

4 Fundamental Principles

4.1 In CD #10, paragraph 1.3.3, it is stated that the approach adopted in defining a revised boundary has been based on issues raised by the Inspector and Landscape Assessor, notably the need to:

- Exclude lower quality landscape
- Exclude land which is of non chalk character other than where there is a strong visual link or other associations with the core chalk downs

4.2 On the first issue, the SDC notes that the exclusion of lower quality landscape arises from the Landscape Assessor's report (CD#3 Appendix B) where a significant area of the so-called 'A3 corridor' (Upper Rother Valley) and the Rother Valley in West Sussex (Lower Rother Valley) are judged to be of poor landscape quality. The SDC profoundly disagrees with these conclusions: it believes that these areas retain natural beauty and is supplying new evidence to the Inquiry to support its case.

- 4.3 The SDC is very concerned that CD #3 Appendix B contains a number of unsubstantiated claims, which are not supported by evidence, but are material to the provisional conclusions reached by the Inspector. Examples are:
'The effects of agricultural intensification noted in 1995 remain evident in the area and it is likely that the condition of the landscape has deteriorated further in the intervening decade' (para 2.9)
- 'I consider it likely that the landscape quality has deteriorated significantly in the thirty-eight years since the confirmation of the AONB in 1966'* (para 2.13)
- 4.4 This is a relevant issue in the context of the High Court and Appeal Court findings in relation to the Meyrick Case (section 4 of #1147/1/1 refers). Other similarly unsubstantiated conclusions are referred to elsewhere in this proof of evidence or in other evidence presented by the SDC. This is pertinent to para 2.1.3 of CD #10, since it is clear that such conclusions are used as the starting point for the boundary work and the tracts of land have not been reviewed as part of the study underlying CD #10.
- 4.5 On the second issue, the SDC has already presented evidence to the Inquiry that there is no legal or policy requirement for a National Park to possess a core landscape character nor have National Parks been designated on this basis in the past. The SDC's evidence is set out in #1147/1/1 and in CD217. The SDC therefore fundamentally disagrees with the misguided underlying rationale for the possible new boundary that assumes a requirement for a core chalk characteristic for the PSDNP.
- 4.6 This proof of evidence should be read in the context of the above. The fact that the SDC brings to bear further, more detailed evidence on the possible new boundary between Petersfield and Pulborough should in no way be regarded as an acceptance on its part of the need for such a possible new boundary. The following is therefore only relevant should the Secretary of State reject the evidence of the SDC and others and be minded to confirm a PSDNP based on the Inspector's provisional findings.

5 Connectivity

- 5.1 The SDC notes with concern that, in determining connectivity to the chalk uplands, only visual connectivity appears to have been considered (para 6.151 of CD #3 Appendix A). Moreover, it is suggested in CD#3 Appendix A para 6.149 that the outer limit of this connectivity is 4kms from the chalk. According to para 2.35 of Appendix B to CD #3 this figure is based on the Countryside Agency's consultant's report CD51 in relation to the land between Glynde and Polegate north of the A27. It is noteworthy that in para 6.145 of Appendix A to CD#3, CD182 is quoted which states that:

'there is a strong visual relationship between the west chalk uplands and the west Weald which reinforces the sense of regional identity, but that further east, the open chalk escarpment seems to stand alone as a dramatic wall, which dominates the Wealden plain'.

- 5.2 This perceived difference in the connectivity between the Weald and the chalk in the west and east of the PSDNP is supported by the SDC, which regards the very different topography in the two areas as important in determining visual linkages.
- 5.3 The SDC also notes that in para 2.52 of CD #3, the Inspector suggests that he considers the 4kms measure '*on the high side*'. Moreover, in para 2.48 it is suggested that:

'where secondary scarps occur in the Upper Greensand (sic) extending beyond the PSDNP into the Surrey Hills, they tend to be lower, less dramatic and have far less scenic impact'.

In fact the scarps in the Lower Greensand (sic) progressively gain in height to the north, culminating in the highest point in Sussex at Black Down (within the designated PSDNP), before falling in height again to the north in Surrey. Thus the topography ensures continued visual linkages far beyond 4kms.

- 5.4 The SDC believes also that cultural linkages are important and does not believe that CD #3 Appendix B properly considered other such issues, which are considered further in the SDC's paper CD #46.

6 Review Area

- 6.1 The SDC notes from para 2.4.1 of CD #10 that where there are differences between the Landscape Assessor's recommendations and the Inspector's indicative line the boundary line study has reviewed the Landscape Assessor's analysis. In the view of the SDC the possible new boundary is based more on the Landscape Assessor's analysis than the Inspector's indicative line, particularly in the Upper Rother Valley. The SDC believes in principle that this means that the land lying between the two should be especially subject to scrutiny. This, however, should not be used to imply any support on the part of the SDC for the Inspector's indicative line.
- 6.2 It is also noted that CD #10 does not propose a new line for the eastern boundary of the so-called 'A3 corridor' should the Secretary of State be minded to accept the Inspector's recommendation in para 7.106 of CD #3. There is therefore no possibility of scrutinising any such new boundary at this re-opened Inquiry, since the Inspector's indicative line is unsound in terms of Natural England's policies and the boundary setting guidelines. If the Secretary of State were to be minded to adopt this recommendation there would be a need for further scrutiny, in public, of a possible new boundary.

7 Defining National Park Boundaries

- 7.1 Para 2.5.2 of CD #10 states that the possible new boundary is based on the Inspector's and Landscape Assessor's re-interpretation of the Countryside Agency's boundary setting considerations. Having scrutinised the relevant reports, the SDC agrees with the analysis in section 2.5 of CD #10, that the boundary setting criteria have been re-interpreted in several important respects, in particular that:

- In transitional landscapes, a different and more stringent test is applied
- Features of scientific, historic or architectural value can only be included if the land in question already meets the statutory criteria and that
- Settlements can only be included if they lie within a sweep of countryside that clearly meets the designation criteria, taking into account the influence of the settlement on the land in question.

7.2 The SDC notes from section 2.6 of CD #10 that the boundary setting process for the possible new boundary has included reference to nature conservation designations and cultural designations, in keeping with the provisions of the NERC Act and previous practice. In this regard it is therefore compatible with the boundary setting approach for the chalk landscapes undertaken earlier by the Countryside Agency. However, CD #3 Appendix B, the starting point for this boundary setting process, appears to afford very little weight to these factors and to apply what amounts to a sequential test for natural beauty, with other factors only being considered once landscape quality has been determined. Thus the basis for judging natural beauty within the Western Weald appears to be inconsistent with that for the chalk landscapes.

7.3 The SDC views these modifications to the boundary setting criteria with concern. They collectively amount to a tougher test for National Park designation for the Weald compared with that applied in the chalk landscapes.

8 Consistency

8.1 The issue of inconsistency goes further than this. CD #3 Appendix B identifies a number of detractors in the landscape that are used to underpin the concerns about the quality of parts of the Western Weald. These include power lines, fences, horse paddocks and the impact of roads on tranquillity. However all can be found on the chalk and, indeed, in existing National Parks elsewhere. An example is the treatment of the A3(T), of which it is said in para 3.21 of CD #3 Appendix B:

'I also note that Tranquil Area Mapping shows the A3 corridor in the early 1990s as a tract of land several kilometres wide, where tranquillity has been compromised. The map also suggests that there has been a noticeable reduction in tranquillity within the corridor since the early 1960s (1881/1/2 Appendices F4 and F5)'.

8.2 The same map shows a similar corridor width for the A 24, A 23(T) and A27(T) in the chalk landscapes. It would be difficult to find any road in England that has not shown an increase in traffic since the 1960s, including roads in existing National Parks, like the A31 through the New Forest National Park.

8.3 Another example is the references to intensively farmed fields, both in CD #3 Appendix B and CD #10, as a reason for drawing a tighter boundary. This issue in relation to the Sandy Arable Farmlands is dealt with in #1147/8/1. So far as the Upper Rother Valley is concerned, this is a largely intact medieval landscape. The map at Appendix A from the Petersfield Area District Plan of December 1981 vividly shows that these Wealden landscapes are of higher ecological value than the chalk, because they are less intensively farmed.

- 8.4 Should the Secretary of State be minded to exclude the Western Weald from the PSDNP and adopt this possible new boundary, then the boundary for the PSDNP would be inconsistently drawn.

9 The Possible New Boundary

- 9.1 The SDC submits that as a consequence of these and other issues the possible new boundary is unsound in terms of statute, policy and guidance. In particular it draws to the attention of the Inspector the following issues:

- The boundary is based on the Landscape Assessor's fieldwork which contains significant inaccuracies or inconsistencies
- The boundary is convoluted and difficult to follow on the ground in a number of instances, which is contrary to Natural England's boundary setting criteria
- It excludes parts of high quality and nationally designated wildlife sites purely on the grounds of lack of visual connectivity to the chalk hills
- It excludes features of historic or architectural value close to the possible new boundary because of the Landscape Assessor's approach to boundary setting
- It excludes high value landscapes contained within the Inspector's indicative boundary because of the Landscape Assessor's undue emphasis on factors that do not form part of the statutory criteria for designation
- It splits settlements

- 9.2 The SDC analyses the possible new boundary in more detail below, providing examples of issues of concern.

10 Fieldwork

- 10.1 The SDC has drawn attention in other proofs of evidence to inaccuracies or inconsistencies in the fieldwork underpinning CD #3 Appendix B. These are not repeated here, where the SDC's evidence is confined to issues not considered elsewhere.
- 10.2 A number of the findings reported in CD #3 Appendix B are of a general nature, related to a landscape character area and not traceable to a specific locality. The SDC is concerned by this, since it appears to place undue emphasis on the type of landscape in determining natural beauty. In principle the SDC finds it difficult to accept that entire landscape character areas within AONBs have been degraded, and is particularly concerned that the necessary underpinning evidence is not presented. The following examples, where the location is provided in CD #3 Appendix B, demonstrate the SDC's concerns. (paragraph references relate to those in CD #3 Appendix B)
- 10.3 *West Heath Common*

10.3.1 In para 2.25 it is stated that:

'West Heath Common, which lies to the north-west of Nyewood, is an exception to this general finding (that is that the 'Heathland Mosaic' is of outstanding natural beauty). A large proportion of the heathland is taken up by a working sand quarry. Although the sand pit is mostly well screened by woodland, it is visible from the chalk escarpment and the sound of vehicles reversing is audible from the adjacent Sussex Border Path. The farmland that surrounds the pit to the south and east is characterised by a proliferation of wire fencing and a scatter of low-grade buildings, used in connection with horse grazing, and the dominating presence of the adjacent overhead transmission line. I do not consider that this small area of 'Heathland Mosaic' is of sufficiently high quality to meet the natural beauty criterion.'

10.3.2 In CD #14 West Heath Common is included in landscape character area L2 – Rother Farmland and Heath Mosaic. This is described as an elevated plateau lying immediately to the south of the River Rother, with boundaries being drawn to follow the nearest convenient field boundaries or woodland edge in a transitional landscape with adjacent farmland landscapes.

10.3.3 The key characteristics of this landscape character area that are pertinent to West Heath Common are:

- Well-drained sandy soils supporting a mix of nationally important heathland habitats including open heather heath, acid grassland, bracken gorse, woody scrub and oak, birch woodland
- An intimate mix of semi-natural habitats and agriculture creating valuable foraging and over-wintering sites for a range of bird species
- Numerous Bronze Age barrow cemeteries indicative of a prehistoric ritual landscape
- Remnant unenclosed commons are of a cultural and historic significance and provide open access for recreation
- Large numbers of sand pits indicating the economic value of the sands of the Folkestone Beds

10.3.4 West Heath Common is an area of some 60 hectares bounded to the north by the Sandy Arable Farmlands and to the south by the Mixed Farmland Woodland Vale. The River Rother lies just to the north of the area. A sandpit occupies an area abutting the northern boundary. The sandpit and heathland are a designated SSSI. There are two Bronze Age scheduled bowl barrows.

10.3.5 The Common displays all the key characteristics listed in CD #14 and is a largely intact landscape with strong cultural and wildlife interest. Photos 1 and 2 at Appendix B show the unenclosed heathland and the views to the east over the pastoral fields which are characteristically divided by post and wire fencing, which maintains an openness in the landscape. The main detractor mentioned in para 2.25, the pylons, were in place or planned before AONB designation (#1147/12/1). It is noteworthy that these pylons are not mentioned in CD #14.

10.3.6 The West Sussex Minerals Local Plan of July 2003, and the consultation paper of November 2005, both contain plans to fully restore the sandpit area to heathland with a suitable grazing plan (Appendix C).

10.3.7 The Common is crossed by a number of footpaths. The long distance footpath, the Sussex Border Path traverses the area across the farmland. The heathland is shown as open access on the OS map (Explorer 133) and the long distance Serpent Trail, opened since the previous part of the Inquiry, also crosses this area.

10.3.8 In the view of the SDC para 2.25 exaggerates the detractors in the landscape, which is an intact landscape when measured against the key characteristics for the landscape character type in the latest Integrated Character Assessment for the area.

10.4 *Quebec*

10.4.1 In paragraph 2.30 it is stated that:

‘Again there is one exception to this finding (that the ‘Scarp Footslopes’ meet the natural beauty criteria). A small area, near Quebec and to the south of the overhead transmission line, to the east of Goose Green and west of Nyewood, has been adversely affected by field amalgamation, the presence of pylons and highly visible large-scale farm buildings. These are significant detractors in this flatter, more open area that combine to create an unremarkable landscape, through which the Sussex border path passes. As a result, I consider that this small area fails to meet the natural beauty criterion.’

10.4.2 From the description, the SDC assumes that the area in question is centred on the large fields to each side of Putmans, where the Sussex Border path follows the line of a minor road.

10.4.3 This area falls within the landscape character area J2 in CD #14, The East Meon to Bury Greensand Terrace. The Key Characteristics of this landscape character area that are relevant are:

- A terrace formed from Upper Greensand with a locally prominent northern escarpment clothed in woodland along its length
- Cut by a number of narrow, steep-sided valleys formed by small streams that rise from springs at the foot of the chalk escarpment and flow northwards towards the River Rother
- Damned mill ponds and ornamental ponds are features of the ravine-like valleys
- Fertile and well drained grey loamy soils which have supported a long history of settlement and cultivation
- A diversity of field patterns and enclosure including small irregular fields carved from woodland indicative of medieval assarts at Nursted Copse
- Contrast provided between the more open arable fields and the intimacy and enclosure created by the sinuous bands of woodland and narrow stream valleys

- Occasional woodlands and a well developed hedgerow network provide valuable ecological features
- Dramatic views of the chalk escarpment

10.4.4 The fields in this area near Quebec are open arable. However, as can be seen from the maps at Appendix D and E the field patterns to the west of Putmans can be dated back to at least the mid 19th century and have remained unchanged since then. Most of these fields have strong hedged boundaries, though those around some of the fields to the east of the Sussex Border path have been replanted relatively recently, which may give them a neatly trimmed appearance. The large field to the west of the Sussex Border path and those to the south of it are bounded to the west and north west by a dammed mill pond fed by a spring at Torberry farm, in a narrow ravine that leads to Millhanger Copse, a SSCI. The fields to the east of Putmans are largely unchanged since at least 1948 (Appendix F). The pylons form part of the line which, in #1147/12/1 is demonstrated to have been planned, under construction or in place at AONB designation. It is noteworthy that these pylons are not mentioned in CD #14. The impact of the farm buildings is shown in photograph 3 at Appendix B and is similar to that of many such buildings within the PSDNP. The area is crossed by a number of footpaths from which the chalk scarp can be seen as well as the chalk outlier at Torberry Hill, which is dominant in the landscape.

10.4.5 The SDC concludes that this is a largely intact landscape when measured against the key characteristics of The East Meon to Burton Greensand Terrace in the latest Integrated Landscape Assessment of the area.

11 Convoluted Boundary

11.1 In para 3.1 of CD #10 it is acknowledged that the boundary may be convoluted in places in order to exclude ‘detractors’ mentioned in CD #3 Appendix B. One of these instances, the land at Quebec, is discussed above. The SDC is concerned that in places the boundary is so convoluted as to be impossible or near impossible to follow on the ground, often to avoid a ‘detractor’ that has no or only marginal impact on the wider landscape.

11.2 The SDC considers that this is at odds with boundary consideration 4 in the Countryside Agency’s Approach to Boundary Setting¹, which was used during the definition of the PSDNP boundary. Moreover, the SDC questions the materiality given to these perceived detractors in boundary setting. It notes in this context that in para 2.31 of CD #3 Appendix B it is stated in the context of the ‘North Wooded Ridges’ character area that:

‘Recent development, horse paddocks and ornamental planting of a suburban character have a local effect on the landscape quality of the southern parts of the landscape type, particularly nearer the A272. These detractors are generally well screened by woodland when viewed from lower ground, and I do not consider that they significantly affect the overall landscape quality’.

¹ As defined in the Countryside Agency’s Board Paper (AP00/30)

This approach to detractors is at odds with that in the context of the Upper Rother Valley and the Sandy Arable Farmlands.

11.3 Para 3.1.2 of CD #10 draws attention to the particular problems associated with drawing a line in the Upper Rother Valley, in particular around Steep Marsh.

11.4 Other examples are set out below:

11.5 *Steep*

11.5.1 The boundary follows the line of back gardens that abut Northfield Wood, where the demarcation between the gardens and the woodland is difficult to discern on the ground in places. It then circles around Island Farm, apparently to exclude an area of horse paddocks that are within an enclosed landscape and which have little or no impact on other than the immediate landscape. (Appendix B Photo4). Around Rothercombe Farm it follows a contorted path between small to middle-sized fields with no apparent rationale except to exclude dwellings and farm buildings.

11.6 *West Harting*

11.6.1 To the east of West Harting (SU 785208) the boundary ceases to follow any physical feature on the ground, crossing a field in a shallow valley before connecting to the border of a copse to the west of Upperton.

11.7 *Nyewood*

11.7.1 To the east of Nyewood (SU 807217) the boundary follows a field boundary before crossing the dismantled railway. It is impossible to discern at what point the boundary exits the field as the field is bounded along its entire length by a barbed wire fence. In order to cross the dismantled railway line it is necessary to cross 5 fences including a live electric one, cross the overgrown dismantled railway, a stream and finally another fence before reaching a hedgeline to the north of the railway.

11.8 *Goldballs Plantation*

11.8.1 The boundary goes through a managed woodland plantation which is rotationally cropped and replanted. The boundary appears to have been drawn to avoid the most recently replanted areas. In places it follows a shallow bank topped by a derelict wire fence, which is very difficult to identify on the ground (Appendix B Photo 5).

11.9 *West Lavington to Duncton*

11.9.1 It is acknowledged in para 3.2.6 of CD #10 that this was a particularly difficult area within which to draw a boundary line. The result is a line which is very difficult to follow on the ground, contrary to the Countryside Agency's Approach to Boundary Setting¹ (Appendix B Photo 6 refers).

¹ As defined in the countryside Agency's Board Paper (AP00/30)

12 Nationally Designated Sites

- 12.1 One nationally designated SSSI is split by the boundary: at Coates Castle. This is contrary to the Countryside Agency's Approach to Boundary Setting¹.
- 12.2 The SDC also notes that a number of SNCI's are excluded though either adjacent or in close proximity to the boundary. The SDC questions whether these areas have been thoroughly scrutinised for their value and contribution to the PSDNP before being excluded.

13 Features of Historical or Cultural Value

- 13.1 A number of features of historical or cultural importance lie between the possible new boundary and the Inspector's indicative boundary, which were not taken into account in CD#3 Appendix B. They include:

13.2 *Lyss Place*

- 13.2.1 Mentioned in the Hampshire Register of Historic Parks and, this house dates originally from the 15th century.

13.3 *Romano-British Settlement, West Liss*

- 13.3.1 Since the adjournment of this Inquiry excavations have revealed a high class Roman Villa and associated buildings in a field adjacent to the A3(T) (#1147/11/1).

13.4 *Bedales School*

- 13.4.1 This is described as: '*extends urbanising influences outwards from the nucleated settlements towards the A3*' in CD #10, section 3.2.4. The Bedales estate was founded on and remains, in part, a working farm with a number of 17th and 18th century buildings. The school buildings include the Grade 1 listed Library and quadrangle by Gimson, the most important of a family of Arts and Crafts buildings, all Grade 2 Listed, in Church Road.

13.5 *Roman Villa, Stroud*

- 13.5.1 This is a scheduled ancient monument, containing the remains of a dwelling, a bath house and a farm building.

14 Misapplication of Designation Criteria

- 14.1 In para 3.1.2 of CD #10, it is stated that one of the key issues is the extent of the A3 corridor. The SDC has brought forward other evidence to this re-opened Inquiry to demonstrate that the impact of the A3(T) in the Wealden landscapes has been exaggerated. By drawing back the possible new boundary line in the Upper Rother

Valley significantly from the Inspector's indicative line, high quality landscape has been omitted from the PSDNP.

14.2 In CD #14 this area forms part of landscape character type K1 – Rother Valley Mixed Farmland and Woodland. Key characteristics that are relevant to this farmland landscape are:

- Low lying clay and sandstone 'vale' containing numerous tributary streams and ponds. Contains the wooded course of the Upper Rother Valley which flows across the sandstones
- Slowly permeable soils support mixed farmland, unimproved neutral grassland and woodland in which thick hedgerows and spreading hedgerow oaks create a lush, wooded character
- Woodlands of ancient origin support characteristic ancient woodland plant species, as well as providing important habitat for a range of breeding bird species and invertebrates
- Thick high hedgerows, small blocks of scattered woodland and wooded field boundaries (rews) contribute to a sense of intimacy and enclosure
- A medieval landscape of scattered hamlets and isolated farmsteads of medieval origin set within irregular fields, some of which retain the original lobate form of medieval assarts surrounded by woodland
- Views over this area from surrounding high land including the chalk downs and greensand hills

14.3 The Upper Rother Valley is a significantly intact medieval landscape. This is demonstrated not only in the medieval assarts close to Steep but in the farmland field patterns such as those at Berrygrove Farm in Liss Parish (Appendix A Photo 7), and New Buildings Farm in Stroud Parish (Appendix A Photo 8), all demonstrating early mound and ditch boundaries with mature hedgerows and many surviving oaks, typical of a medieval landscape.

15 Split Settlements

15.1 The Countryside Agency's Approach to Boundary Setting states that settlements should not be split by a National Park boundary. This is not an easy test to be applied when the settlement concerned is non-nucleated and of a dispersed pattern. To base a boundary on a settlement policy boundary from a Local Plan or LDF can split a community as it perceives itself to be. Only if there is meaningful public consultation can such issues be resolved. In the case of the possible alternative boundary this consultation did not take place. A major example of the impact is Steep, where the local perception is that the settlement has been split.

16 Conclusion

16.1 The SDC is concerned that the underlying concepts and fieldwork of the possible new boundary between Petersfield and Pulborough is unsound when judged against

statute, policy and boundary setting guidelines. It also believes the boundary to be drawn inconsistently with that in the chalk.