



Report to the Secretary of State for Environment, Food and Rural Affairs

by RN Parry BA DipTP MRTPI

an Inspector appointed by the Secretary of State
for Environment, Food and Rural Affairs

The Planning Inspectorate
Temple Quay House
2 The Square
Temple Quay
Bristol BS1 6PN
☎ GTN 1371 8000

Date 28 August 2009

SOUTH DOWNS NATIONAL PARK

INSPECTOR'S REPORT

Hearing held on 18 August 2009

File Ref(s):

Temple Quay House
2 The Square
Temple Quay
Bristol BS2 9DJ

28 August 2009

To the Right Honourable Hilary Benn MP
Secretary of State for the Environment, Food and Rural Affairs

Sir

**SOUTH DOWNS NATIONAL PARK (DESIGNATION) ORDER 2002
(as varied by the South Downs National Park Designation
(Variation) Order 2004**

This report relates to the public consultation exercise and subsequent hearing held in respect of the possible inclusion of 6 "additional" areas in the proposed South Downs National Park. These are the areas that are identified in paragraph 83 of the letter dated 31st March that sets out your decision on the National Park and the other issues to be determined (Doc.CD12). In addition, as requested in the letter dated 20th July 2009 from the Defra to the Planning Inspectorate (Doc.CD13), the report considers representations in respect of 2 other areas of land, namely land at Green Ridge, Brighton, and land at Gote Farm, Ringmer.

Although falling outside the defined terms of reference set for the public consultation/hearing, the report also refers to 2 locations where the previously recommended boundary is defective for what might be called technical reasons. As I understand it, if the Secretary of State is minded to agree with my recommendation in respect of one of these areas (at Offham), the boundary could be varied without the need to undertake a further public consultation exercise as required by paragraph 2(3) of Schedule 1 of the 1949 Act.

I held the hearing mentioned above at the Chatsworth Hotel, Worthing, on August 18th 2009 and undertook a number of unaccompanied site visits that day and the following day. As you will be aware, I previously held the inquiry on the proposed National Park (November 2003 to March 2005) that was subsequently re-opened in 2008 to take account of the NERC Act and other matters. In respect of those inquiry sessions I submitted 2 reports, IR1 in March 2006 and IR2 in November 2008. In March 2009 I also submitted an addendum/corrigendum report, IR3.

The recent public consultation exercise extended over a 12 week period ending 20 July 2009 and attracted 94 written representations. Almost all of the representations support the inclusion of the additional areas as well as Green Ridge and Gote Farm in the new National Park. A list of the representations is provided at Doc.1 attached to my report. Also attached is a list of those who appeared at the hearing (Doc.2) as well as lists of core documents and other documents submitted at the hearing (Doc.3). A number of maps showing the land that I now recommend be included in the new National Park forms an annex to the report.

With one exception, my report takes all of the written representations into account together with the material and submissions put forward at the hearing itself. I have also been given copies of correspondence sent directly to yourself or via David Lepper MP in respect of land at Green Ridge. While these do not appear to form part of the public consultation exercise, it may be helpful to note that the matters raised in the correspondence are broadly those made by others as part of the formal consultation exercise.

The exception mentioned above concerns the representation put forward by the Brighton Urban Wildlife Group (BUWG) – representation No.83. Part of BUWG's representation refers to the marine boundary for the new National Park. A letter addressed to me dated 13th August set out its concerns on this matter in more detail. At the opening of the hearing Mr Belden indicated that he wished to make oral submissions on the marine boundary on BUWG's behalf. As this clearly fell outside the scope of the hearing I ruled that this would be inappropriate. However, I did agree to send a copy of his submission to you without comment. That submission, together with the follow-up letter to me dated 18th August and a letter to Dr Desmond Turner MP, can be found at Doc.CD15. It may be helpful to add that the marine boundary issue was discussed in detail during the earlier inquiry and a summary of the points raised and my recommendations can be found on pages 41 to 44 of my boundary report in IR1.

This report is in 3 parts. The first part examines the 6 additional areas in turn, the second considers Green Ridge and Gote Farm. For each area I set out the relevant background and, where appropriate, the gist of any points made in writing or at the hearing. My comments and recommendations in respect of each area follow. The third part of the report is concerned with the 2 locations where I consider the boundary to be defective for technical reasons.

Robert Neil Parry

Contents Page

Part 1: the 6 "additional" areas

(1)	Alice Holt Forest	5
(2)	Land at Plumpton	6
(3)	Roedean Crescent	7
(4)	Patcham Recreation Ground	7
(5)	A27 embankments	8
(6)	Castle Goring and land east of Titnore Lane	9

Part 2: other named areas

Green Ridge, Brighton	11
Gote Farm, Ringmer	13

Part 3: defective boundaries

Little Bramlands Farm, near Woods Mill Centre	14
Boundary at Offham near Lewes	15

* *

Annex containing revised boundary plans

Map 1	Recommended boundary at Alice Holt Forest
Map 2	Recommended boundary at Southwick Tunnel
Map 3	Recommended boundary at Castle Goring
Map 4	Recommended boundary at Green Ridge
Map 5	Recommended boundary at Offham

List of documents

Doc 1	List of written representations
Doc 2	List of appearances at hearing
Doc 3	List of Core Documents/ and other documents submitted at the hearing

* *

Abbreviations used in this report

Defra	Department for Environment, Food and Rural Affairs
SDNP	South Downs National Park
NERC	Natural Environment and Rural Communities Act
IR1	Inspector's Report (March 2006)

IR2	Inspector's Report (November 2008)
IR3	Inspector's Report (March 2009)
AONB	Area of Outstanding Natural; Beauty
SNCI	Site of Nature Conservation Interest
BUWG	Brighton Urban Wildlife Group
SDC	South Downs Campaign
CPRE	Campaign for the Protection of Rural England

PART 1: THE 6 ADDITIONAL AREAS

(1) Alice Holt Forest

Background Note: In my report following the 2003 to 2005 inquiry I recommended that Alice Holt Forest should not form part of the new National Park – IR1, para. 7.88. This area was not mentioned in IR2 but in IR3, paragraph 3, I reiterated my views regarding its possible inclusion.

Representations

- 1.1 A number of written representations support the inclusion of this area. In addition to those submitted by private individuals, its inclusion is supported by Hampshire County Council and the Alice Holt Community Forum. Briefly the area is said to contain beautiful ancient woodland that includes land having significant wildlife and cultural heritage qualities. It attracts large numbers of visitors and offers superior recreational experiences.
- 1.2 No objections are made to its inclusion in the new SDNP though Hampshire County Council and the SDC both promote variations to the defined boundary.

Inspector's comments and recommendations.

- 1.3 Although I was not previously persuaded that this area should be included in the SDNP, much of the area is undoubtedly beautiful and it is clearly an important recreational resource. My doubts regarding its ability to satisfy the statutory tests were primarily rooted in the adverse impact of the ribbon and other development along Blacknest Road and the presence of extensive commercial uses such as the Birdworld Zoo. While these inevitably tend to fragment the landscape, on reflection I do not find it surprising that Alice Holt Forest is a tract of land now deemed to pass the statutory tests and warrant national park status.
- 1.4 So far as the boundary variations are concerned, at the hearing Natural England said that it supported Hampshire County Council's suggestion that the boundary be drawn to follow the fence that separates Rowledge School from the wider forest. I see no reason to disagree. The fence is the obvious and most appropriate boundary feature. It should be noted that the change is modest and barely discernable due to the small scale of the defra map, CD5. The map attached to the County Council's submission (No.53) is at a more useful scale.
- 1.5 The boundary change promoted by the SDC would effectively enlarge the tongue of land alongside the A325 road that falls outside the additional area. In its view this area does not satisfy the statutory tests and therefore undermines the soundness of including Alice Holt Forest in the National Park. I tend to agree. The Birdworld Zoo and the adjoining garden centre both contain a significant amount of built development as well as extensive areas set aside for car-parking. While a national park can reasonably "wash-over" pockets of intrusive development, it seems to me that

in practice a more conservative approach may be appropriate when land at the margin is being assessed. Excluding the Birdworld Zoo/garden centre land would also alleviate my general concern that the commercial uses tend to fragment the wider forest landscape.

- 1.6 **I therefore recommend that Alice Holt Forest be part of the new National Park subject to the boundary amendments mentioned above. Map 1 in the annex to the report indicates the area that I recommend for inclusion.**

* *

(2) Land at Plumpton

Background Note: In IR1, paragraph 7.340, I expressed support for a small extension of the boundary at Plumpton. The change was promoted by the Plumpton Parish Council albeit that the land in question is at the edge of the small settlement of East Chiltington. Unfortunately the recommended change was incorrectly drawn on map 22 of the accompanying Volume 3 and was shown as a deletion rather than an addition. While the 31st March decision letter accepts that recommendation (paragraph 46), in the absence of any previous opportunity to comment on the inclusion of this land it is identified as one of the 6 additional areas.

Representations

- 2.1 No "in-principle" objections were submitted in respect of this additional area and Lewes District Council and a local resident both support its inclusion. Amongst other things it is said that the land in question contains an attractive block of woodland and a small lake used for fishing. The SDC also generally supports its inclusion though it is not convinced that the whole area satisfies the natural beauty test and a possible alternative boundary is identified to exclude lesser quality land.

Inspector's comments and recommendation

- 2.2 The land that the Campaign claims may not pass the natural beauty test is currently used for "horsiculture". Post and wire fencing has been introduced to create small pony paddocks and a couple of small buildings have been erected. While I accept that these features are not scenically attractive their visual impact is modest and in my judgement insufficient to warrant the exclusion of the land from the new National Park.
- 2.3 **I therefore reiterate the recommendation in IR3 that the additional land identified at Plumpton be part of the new National Park.**

* *

(3) Roedean Crescent

Background Note: In IR2, paragraph 7.192, I said that the boundary should be varied to include land to the rear of the line of dwellings in Roedean Crescent, Brighton. While the 31st March decision letter accepts that recommendation (paragraph 75), in the absence of any previous opportunity to comment on the inclusion of this land it is identified as one of the 6 additional areas.

Representations

- 3.1 There are no objections to this land and a number of written representations support its inclusion in the new National Park. In particular it is said that the current boundary is not identifiable on the ground and as such it fails to satisfy the boundary setting guidelines first established by the Countryside Agency, Natural England's predecessor.

Inspector's comments and recommendation

- 3.2 While my recommendation in respect of this sliver of land primarily aims to ensure that the new boundary is identifiable on the ground, it is relevant that the land in question has a cover of chalk grassland and as such is a relatively rare commodity of high intrinsic merit. In my opinion its inclusion in the new National Park is wholly appropriate.
- 3.3 **I therefore reiterate the recommendation in IR3 that the additional land identified at Roedean Crescent be part of the new National Park.**

* *

(4) Patcham Recreation Ground

Background Note: In IR2, paragraph 7.191, I said that the boundary of the SDNP should be varied to include Patcham Recreation Ground. While the 31st March decision letter accepts that recommendation (paragraph 74), in the absence of any previous opportunity to comment on the inclusion of this land it is identified as one of the 6 additional areas.

Representations

- 4.1 There are no objections to the inclusion of this land and Brighton City Council, the SDC and others all support the proposed variation of the boundary to bring it into the new National Park. Amongst other things it is said that the recreation ground is visually attractive and that the A23 forms a clear and much more obvious boundary for the SDNP.

Inspector's comments and recommendation

- 4.2 I see no reason to alter my previous recommendation that the land in question be included in the SDNP. The A23 represents a very clear physical boundary and the recreation ground itself forms the attractive foreground to a wooded hillside.
- 4.3 **I therefore reiterate the recommendation in IR3 that Patcham Recreation Ground be part of the new National Park.**

* *

(5) A27 embankments

Background Note: In IR1, paragraph 7.453, I said that a series of verges/embankments alongside the A27 at Brighton should be included in the SDNP. While the 31st March decision letter at paragraph 76 accepts that recommendation, in the absence of any previous opportunity to comment on the inclusion of this land the embankments and verges are identified as one of the 6 additional areas.

Representations

- 5.1 There are no objections to the inclusion of the A27 embankments/verges between Shoreham and Falmer, indeed Brighton City Council, the SDC, the CPRE and many individuals support their inclusion. However, under this head the SDC draws attention to the boundary at the entrance to Southwick Tunnel. More precisely it notes that in IR1 at paragraph 7.739 I supported the boundary variation agreed by the SDC and the former Countryside Agency but in IR3 at paragraph 9 I said that the variation had been "overtaken by events". The SDC adds that although I had separately recommended that nearby land at Mile Oak should no longer be part of the new National Park the agreed boundary variation at the entrance to Southwick Tunnel should stand.

Inspector's comments and recommendation

- 5.2 On reflection I accept that although the majority of the land at Mile Oak should be excluded from the new National Park it does not follow that the agreed boundary variation at Southwick Tunnel should be set aside. The variation simply ensures that the boundary at this point is identifiable on the ground.
- 5.3 The agreed variation is shown in detail at annex E to the SDC's submission. However, to avoid uncertainty as to how the boundary relates to the nearby land at Mile Oak, map 2 in the annex to this report effectively replaces the addition 25 map in IR2, Volume 2.
- 5.4 **I therefore reiterate the recommendation in IR1 that the embankments/verges alongside the A27 be part of the new National Park subject only to variation at Southwick Tunnel as shown on map 2 in the accompanying annex.**

* *

(6) Castle Goring and land east of Titnore Lane

Background Note: In IR1, paragraph 7.803, I recommended that the designation order boundary be pulled back to exclude land east of Titnore Lane, Worthing. Having considered additional evidence in the wake of the NERC Act and the *Meyrick* judgements, in IR2, paragraph 7.167, I recommended that the excluded woodland should form part of the new National Park together with Castle Goring, an important historic building, and the mainly open land to the south of it.

Representations

- 6.1 The West Durrington Consortium submitted detailed written and oral evidence in support of its objection to the inclusion of the land east of Titnore Lane in the SDNP. The objection was supported by members of the Somerset family, representing the owners of much of the land in dispute.
- 6.2 Briefly, the Consortium argues that while the *Meyrick* judgements and the NERC Act 2006 widen the interpretation of both "natural beauty" and "recreational opportunities", land still has to satisfy the requirements of the 1949 Act and Natural England's test criteria. The Consortium doubts if the land in question does. The woodland east of Titnore Lane may pass the natural beauty test but the adjoining open land is not high quality and it fails to provide a markedly superior recreational experience. Whatever the final decision regarding the boundary in this locality it is critical that it should not prejudice the major development area – a major urban extension of Worthing - on the adjoining land at West Durrington.
- 6.3 Mr C Somerset adds the inclusion of the mainly open land to the south of Castle Goring appears to be based on the assumption that it is parkland associated with the house itself. However the land in question was never parkland linked to Castle Goring. Claims that Castle Goring and the land to the south of it are readily visible from the Highdown Hill and elsewhere are also incorrect. There are views from the footpath at the eastern edge of the proposed additional area, but these will diminish when a recently planted hedgerow matures.
- 6.4 By contrast, the SDC, Worthing Society, East Preston and Kingston Preservation Society, Ferring Conservation Group and many individuals support the inclusion of the woodland, Castle Goring and the mainly open land to the south of it. A number of respondents mention that even if the open land is excluded, the ancient woodland alongside Titnore Lane should be included, not least to avoid splitting an SNCI. In addition to the nature conservation value of the woodland, it is said that this area merits inclusion in the new National Park given that it contains Castle Goring, a Grade 1 listed building, a Grade 2 listed walled garden and land designated as a conservation area. The open land south of Castle Goring is also said to be very attractive and the OS Map 1879

shows it as parkland associated with the parent house, contrary to Mr C Somerset's assertion.

- 6.5 Finally, a number of respondents indicate that even if Castle Goring and the open land to the south of it are not part of the new National Park, the ancient SNCI woodland east of Titnore Lane merits inclusion. This possibility appears to have been ruled out by the comment in the last sentence of paragraph 78 of the 31st March decision letter.

Inspector's comments and recommendations

- 6.6 In IR1 I concluded that none of the land east of Titnore Lane should be part of the new National Park. In IR2 I reviewed that conclusion in the light of the NERC Act, the *Meyrick* judgements and other available evidence. For a number of reasons I concluded that the boundary should be amended to now include the woodland east of Titnore Lane as well as Castle Goring and the open land to the south of it. In changing my original recommendation I gave, amongst other things, far less weight to the absence of clear downland characteristics and strong visual links to the wider Downs and more to the importance of cultural heritage qualities.
- 6.7 Although it is not entirely clear to me that the open land south of Castle Goring should be viewed as a park in terms of the specific reference to such land in section 99 of the NERC Act, the land in question certainly has a parkland appearance and, to my eyes at least, is scenically attractive. When the ancient SNCI woodland, listed buildings, conservation area and parkland landscape are taken together I am in no doubt that the additional area (6) satisfies the natural beauty test. In addition to its intrinsic qualities, it seems to me that the land in dispute is part of the continuum of high quality landscapes that link the wider Downs north of the A27 to Highdown Hill. I would add that including the open land south of Castle Goring also addresses the concern that the eastern boundary of the ancient woodland is difficult to follow on the ground.
- 6.8 As mentioned in IR2, satisfaction of the recreational opportunity test is "more problematic". There is no direct public access to this area and there is no evidence to suggest that the public will be able to access the land at any future date. That said the *Meyrick* judgement confirmed that a much more extensive tract could have national park status even if public access is not available. In effect, this means that the new National Park can "wash-over" land even though public access is absent.
- 6.9 At my site visit it was also evident that the well-used footpath that runs along the eastern boundary of this area allows striking views of the parkland landscape and the woodland beyond. Views into this area are also available from Titnore Lane itself albeit that I share SDC's view that this road does not provide an important recreational opportunity. Some long distance views may also be available from Highdown Hill and elsewhere though it was difficult to establish this with certainty at the site inspection.

- 6.10 In the final analysis the oral and written evidence does not persuade me that the area fails the recreational opportunities test. It follows that as I consider that Castle Goring and the land east of Titnore Lane should be part of the new National Park.
- 6.11 In making that comment it is important to emphasise that the inclusion of this area should not prejudice the timing, nature or scale of the long standing proposal for a major urban extension on the adjoining land. No one suggests that it would, though the Consortium's concern on this point is wholly understandable. The fact that there is to be a 12m buffer between the edge of the development area and the proposed boundary for the new National Park provides some comfort on this point. Even so, when the National Park boundary is defined in detail, it is important to ensure that the newly protected landscape does not intrude onto land that has long been allocated for development.
- 6.12 Finally, I agree with the SDC that the additional area (6) boundary should be varied to exclude the small complex of recently constructed dwellings at Forest Farm.
- 6.13 **I therefore reiterate the recommendation in IR2 that Castle Goring and land east of Titnore Lane, Worthing, be part of the new National Park subject only to a variation to exclude built development at Forest Farm. Map 3 of the accompanying annex shows the area I recommend for inclusion in the SDNP.**

* *

PART 2: OTHER NAMED AREAS

(1) Green Ridge, Brighton

Background Note: In IR1, paragraph 7.689, I concluded that the tongue of land known as Green Ridge and the adjoining embankment alongside the A27 should be part of any new National Park. At that time I added the rider that if nearby Toads Hole Valley is left out of the SDNP all of the land at Green Ridge should be excluded. In IR2 I recommended that Toads Hole Valley be excluded though the map on page 24 of the accompanying Volume 2 left Green Ridge within the National Park. Green Ridge itself was not discussed in IR2. When I subsequently submitted an addendum/corrigendum report I recommended that Green Ridge, like Toads Hole Valley, be excluded from the new National Park, IR3, paragraph 6.

Representations

- 7.1 Brighton City Council, the SDC, the Keep the Ridge Green and many individuals argue that Green Ridge should be included in any new National Park. Amongst other things those supporting its inclusion mention that it is an attractive finger of managed chalk grassland bounded on its southern side by a Saxon hedgerow. It is within the Sussex Downs AONB and is part of a SNCI. Green Ridge is an important recreational resource in its own right and the

nearby footbridge over the A27 enables it to act as a gateway to the wider downland to the north.

Inspector's comments and recommendation

- 7.2 When IR1 was written my concerns regarding the boundary at Green Ridge were primarily directed at the exclusion of the nearby embankment south of the A27. So far as I can recall, no-one argued that the tongue of chalk grassland itself did not warrant national park status. At that time, however, it seemed to me that any future decision regarding its status was linked to the inclusion or otherwise of the adjoining tract of land at Toads Hole Valley. Having concluded in IR2 that Toads Hole Valley should not be part of the SDNP, in IR3 I said that Green Ridge should also be excluded.
- 7.3 Having now re-visited Green Ridge I am in no doubt that the IR3 recommendation was and is wrong. That recommendation relied on a site visit undertaken many years earlier. On reflection, having revisited the locality, I am now in no doubt that Green Ridge (including the embankment alongside the A27) should be part of the new National Park. I say that, firstly, because the boundary recommended in IR3 ignores the fact that it splits an SNCI, and as such is contrary to Natural England's boundary setting guidelines. Secondly, I am in no doubt that this finger of chalk grassland is of intrinsic high quality having been sympathetically managed by the Keep The Ridge Green Group in recent years. Thirdly, Green Ridge may adjoin Toads Hole Valley, but they now have little in common. There is no visual connectivity between them and Green Ridge is much more closely associated with the high quality landscape at Coney Hill to the east.
- 7.4 Green Ridge also offers superior recreational experiences. It is public open space that allows those living nearby and further afield to visit and enjoy an elevated tract of chalk grassland. Significantly it offers exhilarating panoramic views over the downland to the north and east. The A27 runs nearby but because it is in deep cutting the traffic is out of sight and traffic noise does little to diminish the recreational experiences on offer. In short, Green Ridge satisfies both the natural beauty and recreational opportunities tests.
- 7.5 As I understand it, because all of this land has previously been subject to public consultation, the boundary of the new National Park can be amended to include Green Ridge without the need for further consultation and the likely delay that this would engender.
- 7.6 **I therefore recommend that Green Ridge be part of the new National Park. Map 4 in the accompanying annex indicates the area that I recommend for inclusion.**

**

(2) Gote Farm, Ringmer

Background Note: In IR1, paragraph 7.399, I recommended that this area – then described as “Land east of Ringmer” – be part of any new National Park. In IR2 at paragraph 4.35 I confirmed that recommendation subject to a small variation to exclude a number of residential properties. In the commentary supporting the recommendation I said that an objection from the Trustees of the Glyndebourne Estate (Ref.763/1/1) had been withdrawn. As a result I did not take the Estate’s objection into account (or, indeed, the submissions relating to it). I now understand that only part of the objection was withdrawn. The latest consultative exercise provides, therefore, an opportunity to reconsider the IR1 and IR2 recommendations taking full account of the Estate’s objection. It may be helpful to note that so far as I am aware the Estate did not respond to the latest consultative exercise.

Representations

- 8.1 Having reviewed the designation process and the boundary setting guidelines, the Estate’s written submission refers to the changes to the 1949 Act introduced by the NERC Act in the wake of the *Meyrick* judgements. Against this background it sets out its appraisal of the area. Amongst other things it notes that most of the area lies outside the Sussex Downs AONB and, like the former Countryside Agency, the Estate doubts if it passes the statutory tests. In its view it is, rather, mainly unremarkable agricultural land that has more in common with the Low Weald landscapes to the north and east than the high quality landscapes of the AONB to the south. Gote Farm also suffers from the presence of man-made features such as power lines and proximity to the settlement of Ringmer. While the NERC Act may have given added weight in the designation process to features of cultural and historical importance, this area is not identified in the Local Plan as one that merits archaeological protective policies. Little weight therefore should be given to Gote Farm’s cultural heritage qualities.

Inspector’s comments and recommendation

- 8.2 At the outset it is important to record that although the Estate’s objection was not taken into account when IR2 was written, the inclusion or otherwise of Gote Farm was considered in detail during the first part of the inquiry. At that time the Countryside Agency put forward a comprehensive submission in support of its decision to exclude Gote Farm from the SDNP. By and large, the points made by the Agency were those that the Estate later relied upon. In the final analysis, however, I concluded that the land in dispute “read” as a continuation of the nearby core downland landscapes and should therefore be part of the SDNP. In effect Gote Farm provides the attractive setting to the dramatic chalk hillsides of the Mount Caborn block to the south. In my opinion the natural beauty test was and is satisfied notwithstanding that the power lines running across the area are somewhat intrusive. While the land in question runs up to the edge of Ringmer, in my view this is not in

itself an overriding concern. There are, after all, many instances where the boundary of the new National Park is hard against an urban edge.

- 8.3 So far as the recreational test is concerned, several public footpaths cross Gote Farm and allow local residents to enjoy the area at first hand. The Countryside Agency may have had doubts regarding the satisfaction of the natural beauty test but it did not dispute that the area offered significant recreational opportunities.
- 8.4 In IR1 I also expressed the view that the designation order boundary was difficult to identify on the ground. Potato Lane, by contrast, represented a very obvious and clear boundary.
- 8.5 Having now revisited Gote Farm I see no reason to alter the recommendation set out in IR1 and confirmed generally in IR2. In my view the land in dispute is part of wider tract of largely unspoilt agricultural land that satisfies the statutory tests. Indeed, in the wake of the NERC Act, it seems to me that the cultural heritage qualities of the area, for example the 2 listed buildings and recent archaeological finds, tend to strengthen the case for inclusion, notwithstanding the absence of protective archaeological designations in the now somewhat dated Local Plan.
- 8.6 **I therefore reiterate my recommendations in IR1/IR2 that Gote Farm be part of the new National Park.**

* *

PART 3: DEFECTIVE BOUNDARIES

Inspector's Note: Under this head the report refers to 2 instances where the proposed SDNP boundary is defective for what might be called technical reasons. I consider that both should be brought to the attention of the Secretary of State albeit that they raise issues that fall outside the terms of reference for the recent public consultation exercise and its associated hearing.

(1) Little Bramlands Farm, near Woods Mill Countryside Centre

Background Note: As I see it representation 66 from Mr D McCormick falls outside the terms of the recent consultative exercise. However, I refer to it in this report as it identifies a technical defect in the new National Park boundary. More precisely, in IR1 (paragraph 7.285) I recommended that additional land in the vicinity of the Woods Mill Countryside Centre be included in the SDNP. Paragraph 4.24 in IR2 confirms that recommendation. It now transpires that the Ordnance base used to define the additional area is out of date and the boundary shown to the rear of Little Bramlands Farm is not identifiable on the ground. The boundary at this point is therefore at odds with Natural England's boundary setting guidelines.

This defect could be addressed by varying the boundary slightly to run along Bramlands Lane. This would bring the house and its outbuildings into the new National Park. The submission from Natural England on this matter (Doc.95/1/66) suggests that the variation would be acceptable to Mr McCormick. While I see obvious merit in this arrangement, I am less

certain that the change can be made without the need for additional consultation and the possible delay this might cause to the completion of the designation process. I say that as the change effectively enlarges the new National Park and thereby gives national park status to land that has not hitherto been subject to any public consultation.

Mindful of the possible delay that further public consultation might cause, on balance I consider that the boundary should be left unaltered. While it is obviously unfortunate that the boundary at Little Bramlands Farm would not accord with the boundary setting guidelines, they are not mandatory requirements. For the avoidance of doubt I would add that if I am wrong and the boundary can be varied without disrupting or otherwise delaying the designation process, it would be sensible to adopt the variation proposed by Natural England.

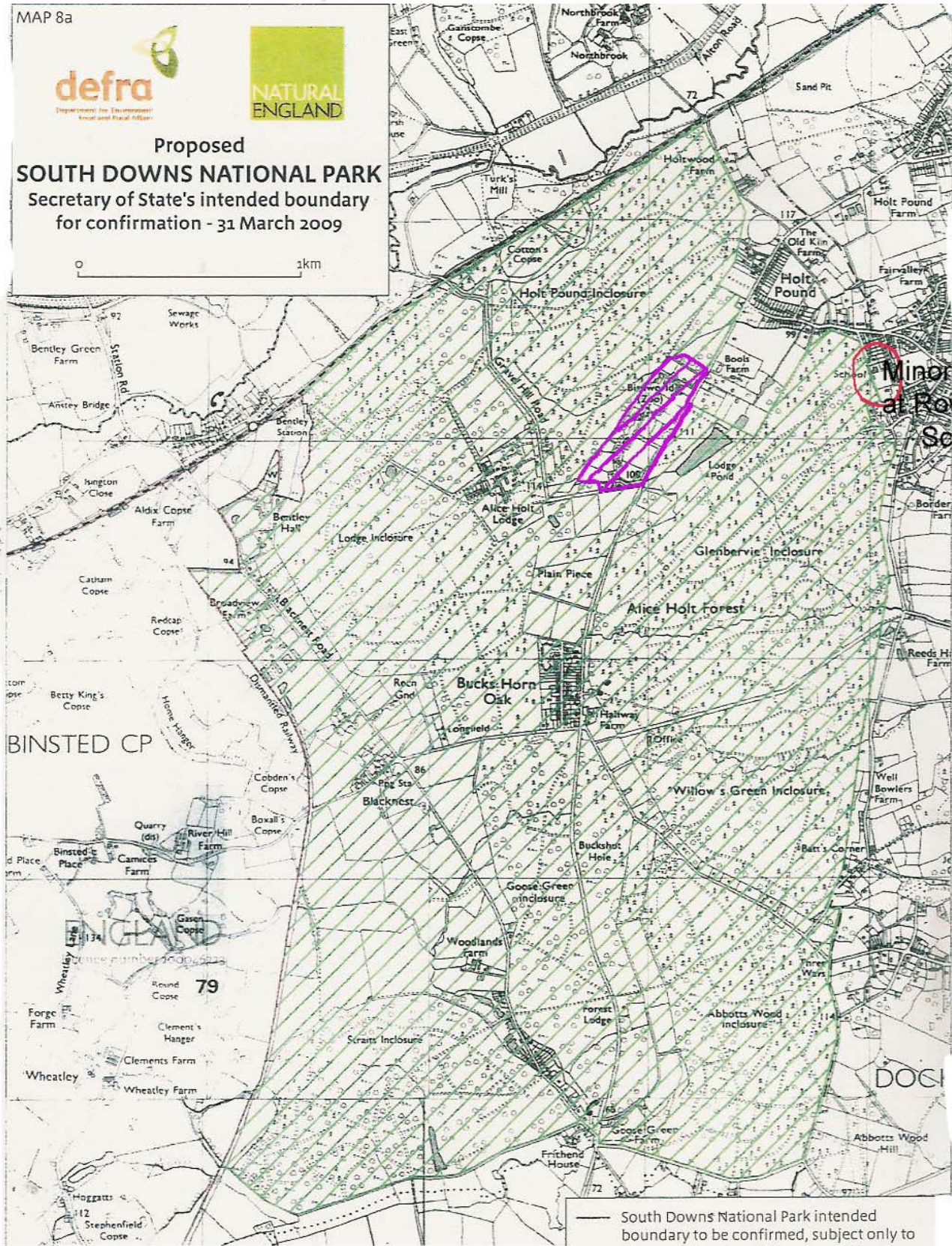
* *

(2) Boundary at Offham

Background Note: In paragraph 7.149 of IR2 I said that the "PSDNP boundary be drawn to exclude only that portion of the Conyboro Estate that lies to the east of the railway line and north of the road known as The Drove." Unfortunately that comment was not fully reflected in the subsequent recommendation set out in paragraph 7.150. The recommendation, rather, simply mentions that part of the Conoboro Estate to the north of The Drove be excluded. The map listed as Deletion 9 in the accompanying mapping volume reflects the way the recommendation is worded rather than my intention as set out in paragraph 7.149. As a result the SDNP boundary splits the settlement of Offham as well as the defined conservation area contrary to Natural England's boundary setting guidelines. This does not apply if the boundary respects the comment in 7.149.

To address this point, map 5 in the accompanying annex shows a revised boundary that excludes land to the north of The Drove and east of the railway line. As I understand it, if this is accepted the boundary could be amended without the need for further public consultation.

Annex of Revised Boundary Plans

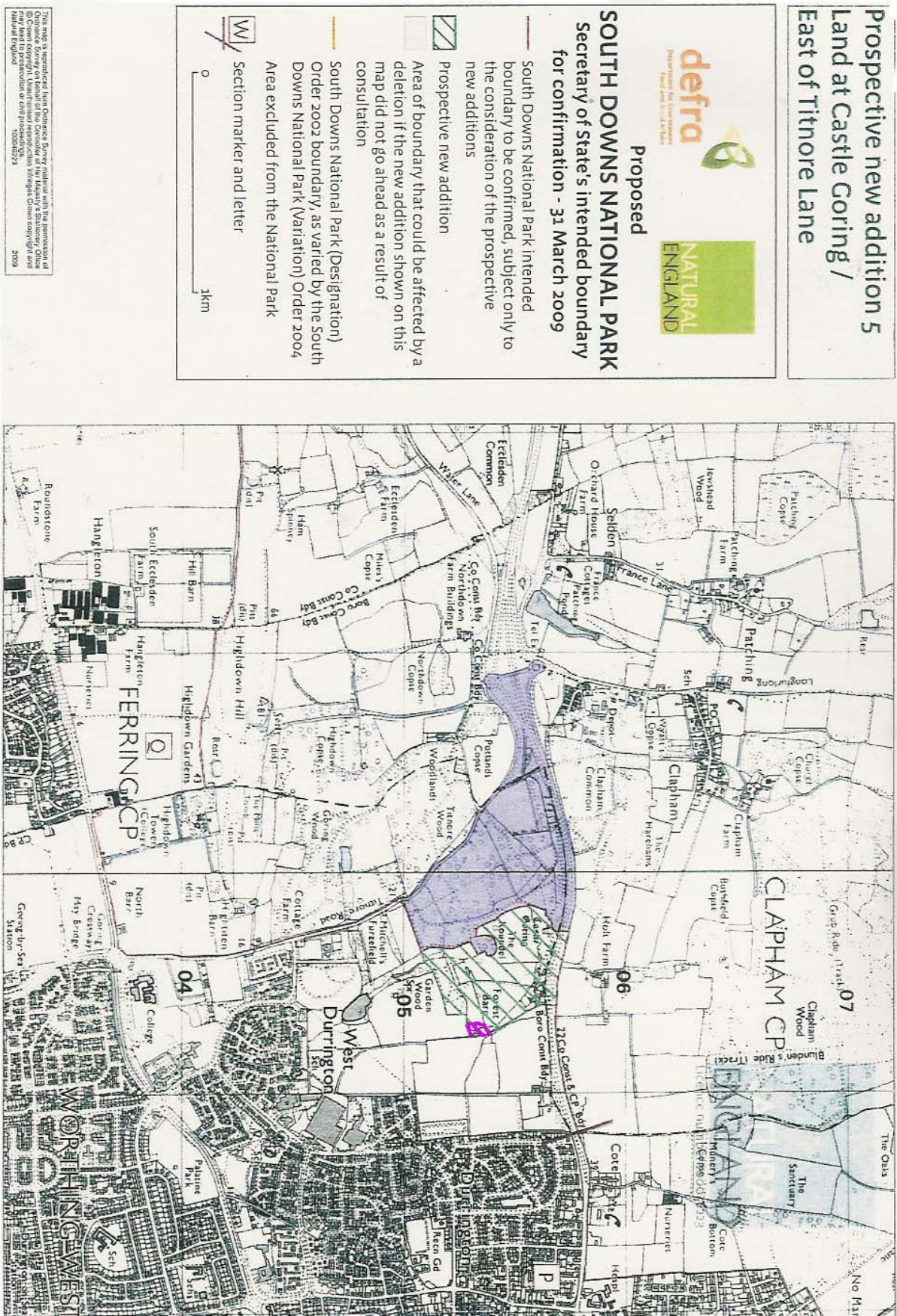


Area shaded purple to be excluded

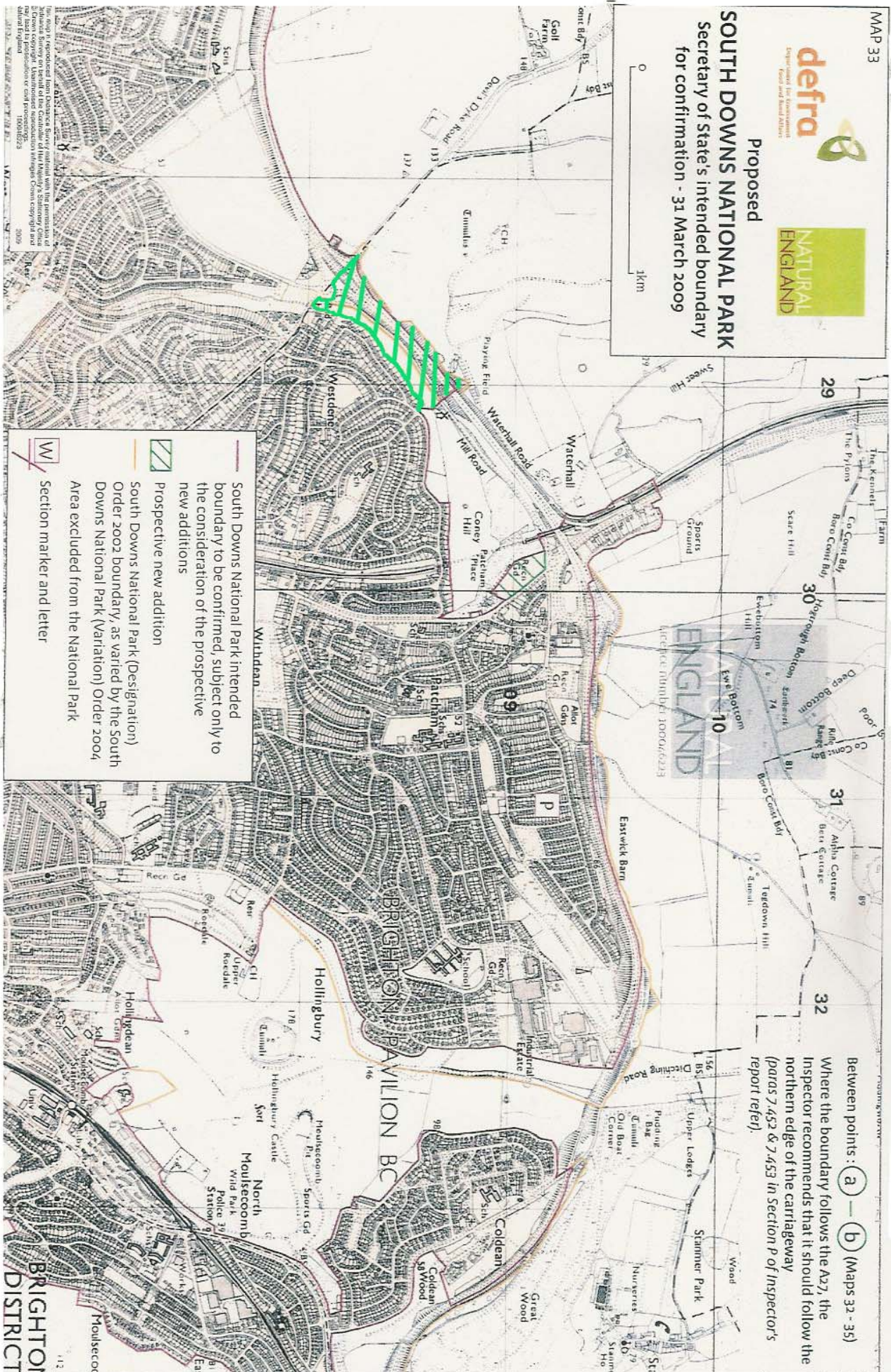
Minor variation at Rowledge School

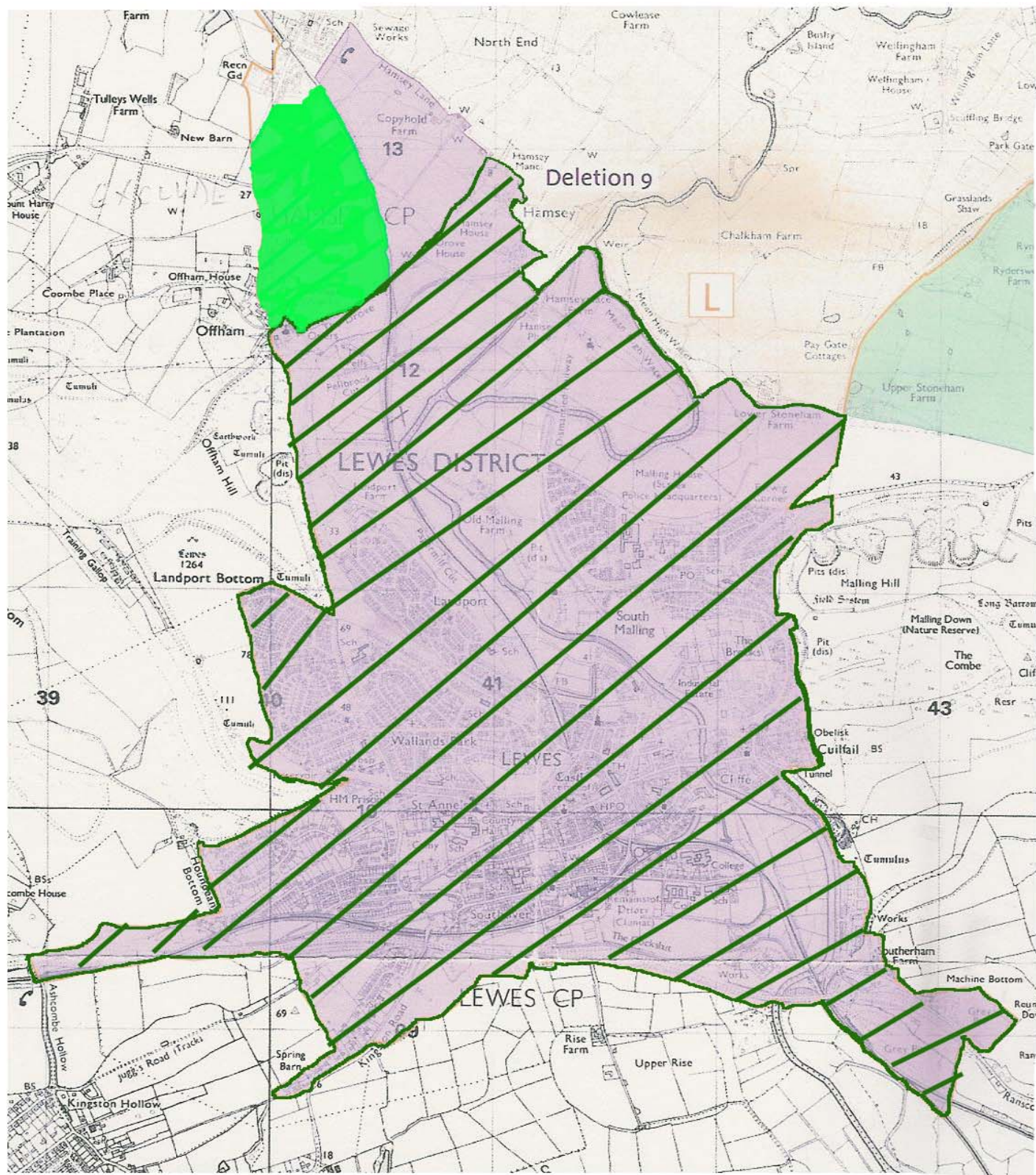
Additional area shown outlined green





Area shown shaded green to be added





Additional area in the North West shaded light green to be included

List of Documents

Document 1

South Downs National Park Hearing 2009

LIST OF REPRESENTATIONS

1	Todd	Chris	South Downs Camp
2	Thomas	Elizabeth	Brighton & Hove City Council
3	Eastwell	Dr Bernard	
4	Hughes	John	
5	Clark	John	Protect Our Woodland
6	Tucker	Gillian	
7	Butler	Patrick	
8	Horsley	John & Annabeth	
9	Cordwell	Clare	
10	Holt	Maureen	KTRG Local Wildlife Group
11	Sellins	Hailey	
12	Luff	Rebecca	
13	Vivian	Claire	
14	Wadsworth	John & Gail	
15	Bartlett	Cathryn	
16	Chamberlain	Nick	
17	Modern	Helen	
18	Lewington	Stephen	
19	Smith	Kelly	
20	Hall	Colin	Alice Holt Community Forum
21	Clements	G	
22	Searle	Nigel	
23	Sebley	Nick	
24	Fisher	Malcolm	
25	Gill	Brian	
26	Martin	Moyra	
27	Penny	Ken	
28	Rickenback	Jess	
29	Abbott	Roger	
30	Longhurst	Emily	

31	Thick	Rod	
32	Hillcoat	Marie	
33	Joseph	Sue	
34	Peel	Nicola	
35	Allen	Carol	
36	Hine	Paul	
37	Gregory	Mark & Deanna	
38	Cheyne	Lilias	
39	Coote	John	
40	Battson	Richard	
41	Green	Lindsey	
42	Hart	Tim	
43	Smith	Dawn	
44	Green	Hilary	
45	Green	Richard	
46	Knight	Mrs P A	
47	Lane	Richard	
48	Tanous	Felicity	
49	Snowden	Ben	
50	West	Peter	
51	Appleton	James	Adur District & Worthing Borough Council
52	Belden	Phil	
53	Tarteglia-Kershaw	Linda	Hampshire County Council
54	Bentley	Mr P	
55	Wills	Michael	
56	Marrington	Emma	CPRE
57	Wilson	Martin	
58	Durant	Robin	
59	Somerset	Fitzroy	Castle Goring Farm Partnership
60	Awdry	M J S	
61	Smith	Miss V J	
62	Murray	Ron	
63	Tasker	Mark	
64	Toomey	Stephen	
65	Miller	Ed	Ferring Conservation Group
66	McCormick	Daniel	
67	Woods	Valerie	

68	Tuttlebury	Stuart	
69	Guxti	Gwinevere	
70	Cummings	Mrs N	
71	Sawers	David	East Preston & Kingston Preservation Society
72	Tanner	Mr & Mrs M	
73	Sumner	David	The Worthing Society
74	Graham	Cheryl & Andrew	
75	Somerset	Clement	
76	Anglo	Prof. Sydney	
77	Cramond	Mr D	West Durrington Consortium
78	Williams	Adrian	
79	Boyd	Alan & Carole	
80	Hulme	Neil	Butterfly Conservation-Sussex Branch
81	Frost	L	Lewes District Council
82	Reed	Theresa	
83	Weaver	Fiona	Brighton Urban Wildlife Group
84	Standen	Jane	
85	Lewington	Roy	
86	Franklin	Dominic	
87	Butler	Richard	
88	Clarke	Caroline	
89	Ritchie	Clare	
90	Pidgeon	June & Frank	
91	Barlow	Linda & Stewart	
92	Thurston	Isabel	
93	Scott	Sharon	
94	Stephenson	Rob	B & H Local Community Wildlife Groups Forum
95	Fairbrother	Chris	Natural England

South Down National Park Hearing 2009

APPEARANCES

For Natural England (NE)

Christopher Fairbrother
Michael Blencowe

OTHER ORGANISATIONS

Brighton & Hove City Council

Elizabeth Thomas

For The South Downs Campaign

Margaret Paren
Robert Cheesman

Brighton Urban Wildlife Group

Phil Belden
Fiona Weaver

West Durrington Consortium

Doug Cramond
Claire Brockhurst
Clement Somerset

East Preston & Kingston Preservation Society and Others

David Sawers

INDIVIDUALS

David Lepper MP
Maureen Holt
Kelly Smith

Document 3

South Downs National Park Hearing 2009

DOCUMENT LIST

CORE DOCUMENTS

CD	1	DEFRA Letter of 20 July 2009 announcing the hearing
CD	2	Western Section of intended boundary line
CD	3	Central Section of intended boundary line
CD	4	Eastern Section of intended boundary line
CD	5	Map of Addition 1 - Alice Holt Forest
CD	6	Map of Addition 2 - Plumpton/East Chiltington
CD	7	Map of Addition 3 - Roedean Crescent
CD	8	Map of Addition 4 - Patcham Recreation Gound
CD	9	Map of Addition 5 - Castle Goring & East of Titnore Lane
CD	10	Map of Addition A - A27 Embankments
CD	11	Map of Addition B - A27 Embankments
CD	12	DEFRA letter of 31 st March 2009
CD	13	DEFRA letter of 30 th July to the Planning Inspectorate
CD	14	Letter from P Belden with attachments.
CD	14a	BUWG 13 th August letter
CD	14b	BUWG 18 th August letter
CD	14c	DEFRA letter of 3 rd August

OTHER DOCUMENTS

1/0	Opening Submission by SDC
1/1	SDC Letter of 28 May 2009 to DEFRA
1/2	SDC - Exclusion of Green Ridge
2/1	B & H CC Preferred boundary on Green Ridge
2/1a	DEFRA's (2009) Boundary on Addition 23
2/1b	2008 Inquiry (vol 2) Map 23
2/1c	SNCI 16 Boundary
2/1d	Chapter 7 - Brighton & Hove Local Plan 2005
2/1e	Extract from Proposals Map
10/1	Maureen Holt on Green Ridge
10/1a	Aerial Map of Green Ridge
10/1b	Sketch Map of Green Ridge
10/1c	Green Ridge, Windmill Walk & Coney Wood

7/1 David Sawers on Castle Goring

75/1 Objection to boundary addition 5 - Castle Goring & Land East of
Titnore Lane

77/1 West Durrington Inquiry Note on Castle Goring

77/1a Map

95/1 Submission from NE on identified Boundary Issue.

95/1a Map 7 - Proposed boundary alteration to accompany submission

95/1/66 Natural England Response to Mr Daniel McCormick

95/1a/66 NE – Map of Little Bramlands Farm