

Coldwaltham Meadow Conservation Group

Matter 1: Position Statement concerning Vision and Objectives

This position statement reflects our original representations to Policy SD12: Historic Environment (Comment ID 2448) and Policy SD9: Biodiversity and Geodiversity (Comment ID 2456).

1. We are concerned that the spirit of the National Park's First Purpose, Vision and Objectives, expressed in broad and encompassing terms in the Local Plan, is being interpreted by SDNPA in the narrowest possible way, to the detriment of the National Park.

2. The first purpose of the National Park is *"To conserve and enhance the natural beauty, wildlife and cultural heritage of the area"*, and this is reflected in the Vision for the National Park, as set out in the Partnership Management Plan: *"The iconic lowland landscapes and heritage will have been conserved and greatly enhanced..."*. The strategic Local Plan Objective 2: *"To conserve and enhance the cultural heritage of the National Park"* has been set to deliver this part of the Vision, amongst others, and this objective is further defined by the footnote *"The reference to 'cultural heritage' encompasses the historic environment"*. (Figure 2.2: Local Plan Objectives).

3. From the above, it would appear that 'landscape' and 'heritage' are considered to be separate entities by the National Park, which is perhaps why each is regarded as a separate Special Quality: *"An environment shaped by centuries of farming..."* and *"Well conserved historical features and a rich cultural heritage"* (Local Plan, p.4). However, these two Special Qualities are interconnected, for most people would recognise that "an environment shaped by centuries of farming" is part of our "rich cultural heritage", especially in the South Downs.

4. Nothing could be more "iconic" in the landscape than a flower-rich hay meadow, managed as such for decades. Although 'semi-improved' at some time in the past, it has a history of appropriate management, which for the last ten years has been aided by the *'Higher Level Stewardship; Target Habitat Grassland'* agri-environment scheme, devised for the purpose of protecting and enhancing its floral quality. As a result, the meadow is close to being a Habitat of Principal Importance. Our representation (Comment ID 2448) demonstrates that other National Parks (Peak District NP, Yorkshire Dales NP and Forest of Bowland AONB) recognise and celebrate the heritage value of their flower-rich hay meadows, whether semi-improved or not, and we made the case for Policy SD64 to be likewise regarded as a cultural heritage asset by SDNPA.

5. This has not been accepted by SDNPA: *"The term cultural heritage encompasses the historic environment. The Meadow [Policy SD64] is part of the wider landscape and biodiversity of the National Park, which is recognised for its own features"* (Summary of Issues and Responses p.63) ... *"The Allocation is not a heritage asset"* (Summary of Issues and Responses, p.260). Clearly, SDNPA take the view that Policy SD64 cannot be a heritage asset because it is part of the wider landscape; we would argue that a flower-rich hay meadow is both, as do the other National Parks referred to above. The heritage value of the meadow is due to the fact that hardly any flower-rich hay meadows, (which, like coppice woodlands, are

man-made artefacts), remain in the countryside: 97% of the UK's flower-rich hay meadows have disappeared since the 1930s (*source: Plantlife and SDNPA Sustainability Appraisal*) and this is the only one left in the Arun Valley.

6. The Development requirement 2f, in Policy SD64, indicates that the SDNPA now recognises the importance of flower-rich meadows as a scarce habitat, but appears to suggest that a meadow management plan for what remains could somehow be considered a biodiversity improvement. This view is echoed in a Preliminary Ecological Appraisal of the meadow, undertaken by consultants commissioned by SDNPA. As we have stated elsewhere, in our position statement to Matter 2 and in our representation to Policy SD9 (Comment ID 2456), a loss of c35% of the meadow to development cannot represent a net gain in biodiversity, even if the remainder is subject to further enhancements. This would be considered outrageous in heritage terms, if it was decided to destroy c35% of a historic building, particularly if 97% of all such buildings had already gone.

7. The SDNPA's failure to recognise the meadow as a heritage asset lacks coherence with the Local Plan, 5.105: *"The term 'heritage assets' refers to any buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest..."*. This failure to recognise the heritage value of the meadow also lacks coherence with the following from the Partnership Management Plan, which, under the heading *"A Thriving Living Landscape"*, states: *"The design of buildings and landscapes may be a deliberate act of creativity, or have developed over time, but it is an important part of the heritage of this landscape...These many strands of cultural heritage contribute to the National Park. This cultural heritage needs to be carefully considered and managed to ensure that important assets survive for future generations."*

8. The SDNPA's failure to recognise the meadow as a heritage asset lacks coherence with the National Park's First Purpose, its Vision and Objectives. In the absence of setting a specific policy for cultural heritage, Strategic Policy SD12 Historic Environment should apply to Policy SD64. Policy SD64 is not coherent with Strategic Policy SD12 and should be withdrawn from the Local Plan to make it sound.

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