

Position Statement on behalf of The Goodwood Estate Company Limited

MATTER 1 : Vision and Objectives

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It is the position of the Goodwood Estate that the response of the local planning authority to concerns raised in representations to the local plan is unacceptable. Neither the proposed modifications nor the reasoning offered through the Summary of Issues and responses offers the Estate with any comfort or certainty that the concerns raised have been considered and adjusted appropriately.

The concerns raised in the representation relating to the soundness of the authority's approach to a vision and objectives for the national park remain. The objectives of restriction and protection are easily stated but the local plan lacks any certainty that the policy framework it proposes can deliver such aims in the light of potentially conflicting needs.

The broad-brush approach to policy application is acceptable at a strategic level if supported by local, detail policy. The latter is absent and for this reason the plan lacks clarity, precision and balance and consequently it provides uncertainty to developers, landowners, businesses and communities with the National Park.

Matter 1 :

Is the Plan based on an appropriate Vision and appropriate Objectives, with reference to established legislation and guidance governing National Parks?

The National Park's objective of protecting the special character and landscape within its area is understood and the local plan sets this out clearly. However, policies and their management that will deliver that objective are unclear, and at times mixed and conflicting. Overall the plan does not provide an appropriate planning balance to meeting its objectives or ensure that the needs of the National Park are sustainable.

The plan recognises a need to allow for 'broadly compatible' developments and businesses, but what is meant by this statement is not explained. In particular, while there is an acknowledgement that inappropriate development will be restricted and landscape protection will be offered primacy, the plan fails to provide a positive planning framework for appropriate and sustainable development as envisaged by the NPPF. Policy tends to be unduly restrictive indicating what is not permitted, but failing to say what is encouraged and indicating a direction it wishes development to follow.

The presumption in favour of sustainable development is not carried through to the local plan where the emphasis is upon restriction and not a presumption in favour unless proven harmful. The plan assumes all development is harmful per se and is therefore inconsistent with national policy.

Applying an unduly restrictive approach to development (particularly housing provision) fails to meet legal and procedural requirements and the local plan cannot therefore be positively prepared nor justified. This concern was raised through representations but no response is offered through the Summary of Issues and Responses nor through the proposed modifications.

The primacy of conserving and enhancing landscape within the national park is accepted but it is not accepted that this objective should preclude all other aims and development opportunities, particularly those making proper provision for defined needs and sustaining the national park. No evidence is provided to demonstrate that these matters are mutually exclusive and that landscape protection and enhancement cannot be achieved if development is allowed. Indeed, we submit that appropriate levels of development can encourage and deliver landscape protection and enhancement by ensuring that a sustained level of funding is available to those responsible for managing the landscape. Un-proven development restriction will have the opposite effect of poorer management and less investment in jobs, homes and the environment. There is real concern, expressed through representations, and without sound response from the authority, that the plan will be ineffective in sustaining land-owning estates through business diversity. Consequently, the management of the landscape will be dispersed as estates are broken up and land sold-off, potentially to those whose objectives are not long-term landscape stewardship or may have differing views as to what uses are appropriate in National Parks.

The South Downs is distinctly different from other National Parks in that it is entirely a managed landscape without areas of "wilderness" or distinctive geographical features. It is a managed landscape primarily of pasture and woodland between settlements of differing sizes and purpose. Unlike many other parks, where the communities are

made up of those managing the landscape and catering for visitors, the South Downs is a major dormitory area for London commuters and the retired, whose demands on the area are different from those in say the Lake or Peak Districts, Snowdonia or the Brecon Beacons. The whole character of the South Downs is built upon the landscape management of major estates and the needs of its communities, including a commuting population, both to London and other major centres. The Goodwood Estate fears the SDNP Authority, while pursuing laudable aims of landscape protection and greater visitor access, seeks to change that balance in the pursuit of objectives akin to those of other national parks. The risk is devaluing the very factors that have given rise to the park and can damage its sustainability.

There is no evidence or comment provided by the authority, through modifications or responses that causes the Estate to change its position on this matter.