Wealden District (Incorporating part of the South Downs National Park) Representation on the Proposed Modifications to the Core Strategy

Working in Partnership

This response relates to the proposed modification	
MM 33	**WS WCS12**
(Please add numeric reference e.g. MM22 or Wealden District Council/ South Downs National Park Authority modification WS e.g. WS 23)	

Declaration:	I consider the proposed modification will assist the submitted Core Strategy to be found sound ☐ /unsound ☒ (*place a cross in the box to show which option you have chosen) for the following reasons:

Reasons Given:	1. The proposed modification to Policy WCS12, notwithstanding the Inspector's additional sentences, does not deal adequately with the transitional arrangements prior to the adoption of policies detailing appropriate mitigation strategies. 2. The Council has pre-emptively introduced the policy of an effective moratorium on development with a 7 km zone around the Ashdown Forest. This policy has not been subject to public consultation or independent inquiry. The Council appears to justify this action as arising from the proposed amendment to Policy WCS12 of the Core Strategy. However, the Council's actions in this respect render the Core Strategy unsound for the following reasons: • The moratorium will frustrate both residential and commercial development for a considerable period of time. There is already evidence of business decisions being deferred or abandoned because of the uncertainty the policy has generated. • This will have adverse effects on the local economy as businesses are unable to implement changes that would otherwise be permissible and beneficial. It will disrupt the housing and other policies of the Core Strategy by delaying preparation for development at Uckfield and elsewhere in the 7 km zone. If the programme for development for Uckfield and its surrounding area is delayed, it will affect housing strategy and delivery as a whole. • The moratorium is disproportionate and counterproductive. It elevates one strand of policy above all others with potentially damaging effects. • Other local planning authorities lie within the 7 km zone. They will be affected by the policy but contrary to the Duty to Co-operate under the Localism Act, the Council appears not to have consulted neighbouring authorities, or indeed its own town and parish councils before introducing the policy. 3. The effects of the moratorium on the Core Strategy will be far reaching. A CS should be a carefully balanced document. If one element of it is disrupted, consequences for other areas are likely to follow making the whole document unsound. 4. Although not a direct part of the Core Strategy, the Council's introduction of a moratorium on development is born out of work undertaken for the CS and it has effects on its soundness and implementation. The Core Strategy should be amended further either to remove the proposed additions to Policy WCS12 until either such time as the CS is reviewed or adoption of a comprehensive mitigation strategy with regard to the protection of bird species on Ashdown Forest takes place, or to introduce more specific transitional arrangements with regard to development in the 7 km zone. 5. In any event, the Council's non-statutory policy of a development moratorium in the 7 km zone should be withdrawn immediately with a public statement that it will not reintroduce such a policy until a full mitigation strategy is formally in place, after public consultation. 6. Finally, a sense of balance is required. Few will doubt the desirability of preserving the habitat of the nightjar and the dartford warbler on the Ashdown Forest but, while the causes of habitat change should be taken into account in arriving at a policy to mitigate the effects of those causes, so too must the impact of such policies on residents and the local economy be taken into account. The Council appears to have addressed the former without considering the unintended consequences on the latter.

If this is a new matter that you have raised please complete the following I wish ☐ / do not wish ☒ (*place a cross in the box to show which option you have chosen) for this matter to be heard in front of the Inspector	
Signed:	David Evison
Name and Address:	Evison & Company
E-Mail Address:	
If on behalf of a company, please state:	The Diocese of Chichester
Date:	12 June 2012

Please place a cross in the box to show which option you have chosen	
I would wish to be notified of the publication of the recommendations of any person appointed to carry out an independent examination of the Core Strategy	Yes ☒ No ☐
I would wish to be notified of the adoption of the Core Strategy	Yes ☒ No ☐

Note: If completing this in hardcopy form, please use additional sheets if necessary.

Please return this form by **5pm on Wednesday 13th June 2012**:

By post to: Head of Planning and Environmental Policy, Wealden District Council, Freepost SEA 10959, Crowborough, East Sussex, TN6 1BR

By email to: ldf@wealden.gov.uk

Data Protection Act 1998 and Freedom of Information Act 2000

Representations cannot be treated in confidence. Regulation 30 of the Town and Country Planning (Local Development) (England) Regulations 2004, as amended, requires copies of all representations to be made publicly available. The Council will also provide names and associated representations on its website but will not publish personal information such as telephone numbers, e-mails or private addresses. By submitting a representation on the Proposed Modifications you confirm that you agree to this and accept responsibility for your comments.

Please telephone 01892 602007 or e-mail ldf@wealden.gov.uk if you require assistance in submitting your representation or if further information is required. If you, or somebody you know, would like the information (guidance notes, forms etc) in large print, braille, audio tape/CD or in another language please let us know.