Head of Planning & Environment Policy
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20 May 2012-05-20

Dear Sir

Modifications to Core Strategy 2012 – re. Land South of Uckfield (Ridgewood Farm)

I would like to respond to the proposed modifications to the Core Strategy. However, it is almost impossible to do so in the format that you require, as it is very difficult to see from the stacks of documents available at my local library, and the documents available online, exactly what the modifications are and to what they relate. You have not made it easy and clear for local residents to understand the detail of the proposals or the modified proposals. For this reason alone, I would like to declare that I consider **the consultation process itself to be unsound**.

However, with considerable difficulty, I managed to obtain some information from the documents available and would like to make the following points. I apologise if this is not in the format that you requested, but it is the best I can do given the obfuscatory manner in which the information has been presented to the public.

In all cases, I consider the proposed modification will assist the submitted Core Strategy to be found UNSOUND.

Ref: WS4, page:29, WCS4

"provision of around 1000 dwellings"…

This contradicts WS3/27/5.8 "60% annual target for brownfield development". This would be a substantial use of greenfield land, in that 100% of the proposed development at Ridgewood Farm would be

greenfield, and not 40%. This also contradicts your own appraisal of the land in **Appendix 2 Matrix Tables of Full Assessment of Broad Locations** where the proposed development is marked by a red arrow, as being counter to the SA Objective "make most efficient use of land by prioritising brownfield sites for development" and acknowledges that the majority of available land is greenfield.

The Appendix 2 Matrix also states the following objectives, and judges the proposed areas for development against these objectives.

- **"conserve and enhance biodiversity of the district"**. The matrix notes that the **"broad area includes small pockets of ancient woodland. There are ponds on site. The Environment Agency have prior records of reptiles and great crested newts on or adjacent to the site".** Again, if only for the sake of the nationally protected rare species of newt, the decision to build on this land is UNSOUND.

- **"reduce air pollution and ensure air quality continues to improve".** Again, the matrix identifies the proposed development as running counter to this objective, with the reasoning **"development of this broad area may encourage car use and increase air pollution through the proximity of the main road the A22 to the area and the distance from the town centre and central services".** By your own admission, this development would reduce air quality and increase pollution, so the decision to build on this land is UNSOUND.

- **"reduce the need to travel by car and promote alternative methods of transport".** Again, the matrix identifies the proposed development as running counter to this objective, stating **"the proximity of the broad location to the road network connecting the broad location to Uckfield and the A22 encourages travel by car for retail and employment purposes together with limited access to the town centre by sustainable transport further promotes this pattern**". Again, by your own admission, this development would increase car traffic to and from the town centre, so the decision to build on this land is UNSOUND.

- **"promote social inclusion and create/sustain vibrant communities".** The matrix identifies the proposed development as being unsuitable because **"the broad location is not associated with any existing part of the community and therefore any development would not present opportunities to improve community cohesion or strengthen existing communities".** By your own admission, this makes the decision to build on this land UNSOUND.

I declare the Core Strategy to be UNSOUND for the following additional reasons. I apologise that these do not relate to specific modifications, as I could not find the specific paragraphs to which they relate.

- **Scarcity of water supplies**

  Since the initial consultation, a hosepipe ban has been imposed in this area. Despite recent rainfall, groundwater levels are still very low. If the water companies cannot supply sufficient water to existing households, how do they propose being able to supply 1000 new houses? I understand that they have agreed to supply the water, but they cannot do so if the water is not available. The scarcity of water supplies makes the Core Strategy UNSOUND.

- **Strain on transport links**

  The A22 Uckfield Bypass is already at capacity, as confirmed by the Highways Department of East Sussex County Council. If access to the proposed development is from the A22, the increase in traffic will reduce this road to a carpark as it will not be able to handle traffic volume. The strain on the existing road network and town centre traffic makes the Core Strategy UNSOUND.

- **Proximity to Ashdown Forest**

  The proposed development is within 7km of the Ashdown Forest AONB. The increase in air pollution from nitrous oxides, from the increased traffic volume to, from and around Uckfield would have a severe impact on the forest ecosystem. The forest has a limited road network, and the increase in traffic flow to/from Uckfield would have a severe impact on the capacity of these roads and the air quality in the forest areas that they cross. The severe impact on this AONB makes the Core Strategy UNSOUND.

  The provision of an alternative green space as part of the development is a ridiculous notion, as it will do nothing to protect the air quality nor prevent journeys across the forest. Also, no right-minded person could possibly consider such a green space to have anything like the equivalent landscape and recreational value as Ashdown Forest.

- **Strain on existing roads and services**

  If part of the "deal" in building the development is for the developer to contribute substantial sums towards the redevelopment of the town centre road system, build a new school, etc, I consider this makes the Core Strategy UNSOUND if not actually corrupt. In my view this makes it highly likely that decisions will be taken based on the amount of money a developer

promises to make available, rather than on the needs of the existing local community or the considerable impact on the environment.

- **Changes to Local Area Framework requirements since the Coalition Agreement of 2010**

  The Core Strategy was developed in response to the Local Area Framework, which has since been scrapped. Until this passes into law, the Core Strategy is being pursued. If in time it is shown that is it unnecessary to build a development of the size proposed, and yet the Core Strategy has been adopted, it may be that a green field site has been needlessly destroyed with no hope of recovery or restitution, and the 1000 houses and the infrastructure supporting such a development will have blighted Uckfield forever. For this reason the Core Strategy is UNSOUND.

I wish ALL these matters to be heard in front of the Inspector.

Yours faithfully

Isobel Moore