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	**WS 8**
(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:	I refer to the Council's letter of the 1st May in which it set out the Council's latest position regarding the Ashdown Forest Special Protection Area. Since receiving this letter along with a number of other agents, we have been inundated with requests for further clarification from, indeed, other agents, Clients, concerned land owners as well as a number of small businesses, for example building supply companies and others who operate within the zone who are deeply concerned that this sudden halt on any form of new development for the foreseeable future will effectively destroy their livelihoods. Taken to its literal conclusion your letter suggests that any form of new development proposal within the zone from windfall site residential, regardless of size, to a change of use, granny annex, residential extension, business extension, etc etc will now be refused unless it can prove that it will result in less emissions than existed previously. Therefore only an example such as a factory site being redeveloped with a single residential unit may be considered appropriate. Such a policy will have a seriously harmful effect on the local economy within the affected land area with many small businesses either going bankrupt or urgently needing to relocate elsewhere. What we fail to understand however is why Wealden is taking this draconian action when to date other local planning authorities in the zone are not. For example we recently attended an agents forum at Mid Sussex where note was made of this situation but the idea of ruling out all new development In East Grinstead for the foreseeable future was discounted. The matter would be monitored and agents advised further if the current policy approach to new development proposals was to be altered. All this appears to stem from the Inspector, Michael Moore's comments in his follow up letter setting out his interim findings dated the 5th March 2012 on the Core Strategy. The Inspector clearly had new housing provision in mind when examining the issue of nitrogen disposition. He confirms this in paragraph 17 where he refers only to housing and "level closest to its original SEP allocation". You appear to have interpreted the Inspector's concerns for "new housing" to mean ALL new development. He does not state this. Furthermore paragraph 16 of the Inspector's letter suggests that the data on nitrogen deposition and what `the science' knows about the process isn't unequivocal. He calls for more research to "establish more accurately the current extent and impact on nitrogen deposition at Ashdown Forest". He emphasizes a "precautionary approach". Wealden's response however makes the assumption that preventing or refusing all new development proposals in the zone that may be considered to add to nitrogen depositions as a result of traffic movements, is not based on any factual evidence whatsoever. Indeed the exclusion zone policy will inevitably lead to greater pressures to develop close to and maybe just outside of the zone which in turn could lead to further concentrated traffic movements resulting in greater pollution within the zone. The exclusion zone policy would appear therefore to be nonsensical, and we do not believe that your Council's actions have been thought through properly, or indeed have the effects on the local population or the economy of imposing a moratorium on all new development proposals within the zone. For many less qualified to understand the full implications of the comments contained in your letter, your Council's actions have been quite baffling and the

	consequences, particularly for numerous small businesses and the local rural economies alarming to say the least. Your letter provides little or no comfort whatsoever that matters may in the short to medium term or even the longer term, progress towards some form of modus operandi that all those affected can come to terms with. Indeed there seems little point in seeking to comply with your mitigation strategy, when adopted, when as you quite rightly then state, "the sterner test" has to be satisfied. This test will result in a catch 22 situation for which the vast majority of proposals will simply be unable to escape from. In conclusion therefore we would strongly suggest that you call a full agents meeting open to all those to whom you have written so that the full impact of your letter can be explained and debated. Agents can then be better informed as to why Wealden appears to be taking unilateral action in this matter, and in turn will be better placed to advise their clients on how to deal with these measures over the coming months and years. In addition we believe that the Council should request that the Inspector re-opens the examination into the Core Strategy in order that he may provide further clarification on the comments contained in his letter dated 5th March.

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:	Adrian Moore

Name and Address:	Adrian Moore MRTPI (Director) Parker Dann
E-Mail Address:	
If on behalf of a company, please state:	Parker Dann
Date:	30/05/2012

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 23rd May 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

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