

South Downs National Park Public Inquiry
(Re-opened)

Additional Areas ***(Wilmington & Tide Mills)***

Supplementary Written Representation

by



May 2008

Contents

Section	Page
1 Introduction	3
2 Wilmington.....	4
3 Tide Mills	5

1 Introduction

- 1.1 The South Downs Campaign (SDC) submits the following supplementary written representation in support of the Inspector's recommended additional areas to be included in the proposed South Downs National Park at Wilmington (Addition 11) and Tide Mills (Addition 13). This submission expands on the SDC's original submissions¹, and is in response to new evidence which has come to light since or during the debate at the inquiry.
- 1.2 The SDC is a network of organisations working for the best possible South Downs National Park, representing over 150 national, regional and local groups and organisations².
- 1.3 This written representation follows previous submissions to the first part of the public inquiry by the SDC on these areas and should be read in the context of those previous proofs of evidence³ which remain relevant.

¹ SDC Written representations: #1147/4/1 and #1147/4/2

² SDC Revised Updated Biography – Inquiry Document No: #1147/0/8

³ See 3275/33/1 – 4 (Cuckmere Valley) and 3275/11/1 & 2 (Tide Mills)

2 Wilmington

- 2.1 At the inquiry hearing on Wilmington, on 27 February, 2008, there was much discussion about changes to the A27 and the issue of whether Wilmington was one or two settlements. During the session, Natural England stated that it was too early and too speculative to say what might happen with regards the A27. The key issue when considering whether to include this additional land in the National Park was whether Wilmington was a split settlement or not. The SDC agrees with this analysis.
- 2.2 At the session Natural England accepted that there was no evidence to suggest there are two settlements, although it also stated that there was no compelling evidence either way. The SDC views this latter remark as rather unfortunate and possibly attributable to the fact that Natural England had not had sufficient time to properly examine the evidence submitted, only a day or two before the hearing, by Long Man Parish Council⁴.
- 2.3 In relation to this substantial submission the SDC would draw the Inspector's attention to two particular pieces of evidence. The first is Map 5, Appendix 2⁵ which shows the Tithe map of Wilmington in 1838/1839. This shows the settlement extending north of the turnpike to Lewes, with the whole of the northern part of the village (lying both sides of the turnpike) being more spread out and less dense in appearance than the southern part of the village.
- 2.4 The second piece of evidence that the SDC wishes to highlight is the management plan for Wilmington & Monken Pyn Commons⁶. The map accompanying the management plan shows Wilmington Green (as the common is known) as extending both sides of the A27. Therefore it is wrong to claim that Wilmington Green only exists north of the A27 as it is equally wrong to claim that Wilmington village only exists south of the A27.
- 2.5 To reinforce this evidence, the SDC would like to point out that the village road sign (for Wilmington) is on the north side of the A27 when approaching from the west. If Wilmington Green was a settlement to the north of the A27, then this would not be the case and the road sign would display the name Wilmington Green instead.
- 2.6 It is clear from the substantial evidence and written testimony submitted by Long Man Parish Council to the re-opened inquiry that Wilmington Green is an inherent part of the village of Wilmington. To further substantiate this, since the hearing the SDC has analysed responses to the public consultation over the summer 2007. During the consultation, 196 people supported the inclusion of this additional area, of which 60 made special mention of their support for Wilmington being included. It is worth noting that aside from the handful of objectors (who have little local knowledge) already mentioned in the SDC's previous rebuttal⁷, everyone else who has submitted evidence is stating that Wilmington is split by the Designation Order boundary.

⁴ Long Man Parish Council written representation, Inquiry Document No: #53/1/1

⁵ #53/1/2

⁶ Appendix 3, #53/1/2

⁷ Section 4, #1147/4/2

- 2.7 The Inspector has also received late representations from various local councillors, including Councillor Charles Peck (LR5), Councillor Roy Martin (LR18) and Councillor Andy Watkins (LR4), in addition to a submission by Norman Baker who is MP for the area⁸. Dr Peter Brandon has also written to the Inspector about this⁹. All support the line that Wilmington is one village and split by the Designation Order boundary and therefore fully support the inclusion of addition 11.
- 2.8 The SDC finds it remarkable that there is so much unanimity of evidence and local opinion stating that Wilmington is one settlement that extends both sides of the A27. Given the weight of this support and the lack of any substantial evidence from objectors showing that Wilmington Green is a settlement in its own right, the only robust conclusion can be that Wilmington is indeed split by the Designation Order boundary. Therefore, the SDC would urge the Inspector to confirm his recommendation to include addition 11 in the South Downs National Park.

3 Tide Mills

- 3.1 At the inquiry session on 27 February, 2008, when Newhaven Port Authority appeared to discuss Tide Mills, there was general agreement that Tide Mills and the beach area met the National Park criteria. Therefore, the debate focussed on the quality of the northern part of the additional area.
- 3.2 The Port Authority did not agree with the Inspector's recommendations and felt that the area was undermined by the quality of the development around it. During the session the Port Authority accepted that the landscaping had matured but did not feel it was particularly fast-growing. In contrast, Lewes District Council was pleased with the way that the landscaping was progressing and with the large number of users of the area. This is obviously an important consideration in assessing whether the northern area and hence the whole of Tide Mills should be included and on this point there was obviously a difference of opinion between the Port Authority and Lewes District Council.
- 3.3 The SDC would like to point out that the landscaping is still relatively new, having only been planted not long before the first part of the inquiry in 2004 and therefore only around 5 years old. The SDC would refer the Inspector to other evidence it has submitted during the re-opened inquiry on the A3(T) landscaping which quotes evidence from the Department of Transport as follows¹⁰:

“Woody plants in England make small growth in the first year or two after planting. As the plants establish and increase in size the annual growth rate increases and there is generally a surge in growth between the fifth and tenth year from planting. Therefore a plantation of mixed native trees and shrubs might grow to between 1 and 1.5 metres high in 5 years, to about 3 to 6 metres in 10 years and possibly to 10 metres in 15 years.”

⁸ #1068/1/1

⁹ This letter is yet to be registered and assigned a reference number (but has been submitted)

¹⁰ Paragraph 4.4.2, #1147/9/1

- 3.4 This demonstrates that while the landscaping has matured since the inquiry last sat the Inspector is unlikely to see a huge difference between then and now because the planting is still relatively new. Therefore in that respect the Port Authority is correct in stating that the landscaping is not particularly fast growing. Only now, five years after it was first planted is the landscaping about to start entering a faster stage of growth. Therefore the SDC would urge caution on placing too much emphasis on the height of the landscaping at present. The important factor is that it is in place, it is now established and will soon start to do the job it was planted to do, even though it may take a further 10 years for it to really develop to close to its full potential.
- 3.5 The only other significant point that emerged from the discussion at the inquiry was when Natural England indicated that the Meyrick Judgment¹¹ would allow the land to the north (the case for which it felt was more finely balanced) to be brought in due to the ‘washing over’ of the landscape, flowing from the Downs down to the sea. The SDC agrees with Natural England that the Meyrick Judgment, with respect to ‘washing over’, strengthens the case for the inclusion of Tide Mills.
- 3.6 Therefore the SDC would urge the Inspector to confirm his recommendation to include addition 13 in the South Downs National Park, subject to a boundary modification on its western edge.

¹¹ Paragraph 83, CD #9 – Meyrick Judgment (High Court)