

Proposed South Downs National Park
Recommended Addition 11 – Land at Wilmington

Written Statement by Long Man Parish Council
Reopened Inquiry February 2008

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1. Long Man Parish

1.1 Long Man Parish includes three villages: Wilmington, Milton Street and Folkington, which are three wards for electoral purposes. Two Parish Councils, Wilmington and Folkington, were merged into one, Long Man, in 1984.

1.2 Wilmington is the principal village in the Parish, and carries a world-famous name because it is in the shadow of The Long man of Wilmington, an Ancient Monument. As is shown below, Wilmington Green is the name of the common of Wilmington and not a settlement in any form, let alone a 'separate settlement' from Wilmington.

1.3 The villages are 'spring-line' settlements at the foot of the escarpment of the South Downs. They run from south to north. The A27 Trunk Road, which is the northern boundary of the Sussex Downs AONB confirmed in 1966, was built as a turnpike in 1829. The form and character of the three villages were established before it was built.

2. Inspector's recommendation: Addition 11, Wilmington

2.1 Objection to the Designation Order was made in 2003 that the proposed National Park boundary split the settlement of Wilmington, contrary to the criteria set for establishing National Park boundaries. The Inspector examined this and concluded (Report para. 7.425) *'In the absence of a defined settlement boundary it seems to me that Wilmington should be regarded as a single settlement rather than 2 settlements either side of the A27. If I am right about that, it seems sensible to amend the boundary to address the point. This could be done in a number of ways. My preference is the easily recognisable line shown in CAR 360'*.

2.2 The inspector's formal recommendation in his report is *'to include Wilmington in its entirety'*.

2.3 Plan CAR 360 was drawn onto the OS Base used by Defra and published as Addition 11 on Map 25.

3. Criteria for National Park boundary setting including inclusion of settlements

3.1 The full criteria published by the Countryside Agency in 2000 for the detailed designation of the South Downs National Park and its boundaries are found in Inquiry core document CD83.

3.2 The criteria and the supporting explanatory notes which relate specifically to the inclusion or exclusion of settlements are as follows (extracted from Appendix 1):

Extract from Designation Criteria (CD83)

Settlements?

The fundamental basis for inclusion of a settlement within the boundary is its relationship with and setting within the wider landscape. As a National Park is a landscape designation, it is not appropriate to include a settlement which is not situated fully within a valued landscape setting regardless of the qualities and contributions that the settlement can make to the National Park.

.....

The detailed criteria adopted by the CA are set out below:

.....

d. Boundaries should include land and settlements which contribute to the rural economy and community life within the Park and to the Park's special qualities and purposes. Such areas should however be excluded where activities there, in particular, urban or industrial development, conflict with or outweigh the essential values of the Park.

.....

e. Wherever possible, an easily distinguishable physical boundary should be chosen.

.....

g. Towns or villages should not normally be cut in two by a National Park boundary: inclusion or exclusion should normally depend on their contribution as a whole to the character and purposes of the Park.

.....

4. The boundary should not be regarded as a sharp barrier between areas of differing quality. In most situations there will be a transition of landscape quality and recreational experience across a sweep of land: the boundary chosen should be an easily identifiable feature within this transition.

.....

Explanatory notes to the Countryside Agency's approach (there is no explanatory note for criterion (d))

.....

2e. This is for both administrative reasons and for the convenience of the visiting public. Roads and railways frequently provide such a boundary.

.....

2g. This may include a contribution to the Park's economy and community life, and a value for visitors; e.g. provision of accommodation, access to public transport, information or other services.

4. Inclusion of Wilmington in the National Park

4.1 The relevant criteria for inclusion of a village in the National Park can be drawn from the 2000 Criteria (CD83) . These are:

- its relationship with and setting within the wider landscape
- the qualities and contributions that it makes as a settlement to the National Park.
- its contribution to the rural economy and community life within the Park
- its contribution to the Park's special qualities and purposes
- whether it is situated fully within a valued landscape

4.2 Additional criteria have been introduced by the Natural Environment and Rural Communities Act 2007 (the NERC Act). By virtue of this Act, ‘cultural heritage’ is now among the factors that can be taken into account in the assessment of the natural beauty of areas being considered for inclusion in a National Park.

4.3 The detailed statement by English Heritage to the Inquiry (1348/1/1) sets out in detail how cultural heritage should be interpreted and how important it is in any appraisal of the South Downs landscape. On the inclusion of settlements, English Heritage states:

7.9. The historical processes that formed the South Downs, left traces in the landscape, which is of major evidential value and generates local distinctiveness. Settlements, regionally as a characteristic of the South Downs landscape, and locally in the buildings and streets and open spaces of particular places, are part of the evidence of the downs’ formation and also key to local distinctiveness; like the fields and woodlands, they are a manifestation of the historical processes that formed the South Downs as we know it.

7.15. Settlement is a characteristic of the South Downs and is a key historical reason for their existence in the form that they have today. In this settlements in the South Downs play a different and more important role than settlements in other more “wild” National Parks. They are therefore part of the character of the downs, and not necessarily an intrusion into the countryside or an incongruity in landscape character, but an integral part of the landscape.

4.4 The inclusion of Wilmington in the National Park as meeting the CD83 criteria is not at issue. No party, including the planning authority, has suggested that it does not meet them. The ‘*contribution as a whole to the character and purposes of the Park*’ (Criterion (g)) that Wilmington as a village makes is not in dispute.

4.5 Inclusion in the National Park is justified by “*contribution to the Park's economy and community life, and a value for visitors; e.g. provision of accommodation, access to public transport, information or other services.* (Explanatory note 2g).

4.6 Wilmington will contribute to the National Park by its tourist features, which include Wilmington Priory and its common, Wilmington Green, and facilities, which are a public house, tea-room, and bed-and-breakfast accommodation.

4.7 The criterion for inclusion of all of a settlement is that “*Towns or villages should not normally be cut in two by a National Park boundary: inclusion or exclusion should normally depend on their contribution as a whole to the character and purposes of the Park*”.

4.8 Wilmington would be cut in two by the Park boundary under the original Designation Order. But the village makes a significant contribution as whole to the Park’s character and purpose. Evidence of its role and place in the South Downs landscape is found in its history, its character as a Downland village, and how its residents view it.

4.9 The question before the reopened inquiry is whether Wilmington is one settlement, or two. Evidence was placed before the Inspector at the original Inquiry demonstrating that Wilmington was indeed one settlement (see doc 3275/33/1 page 13). This written representation provides new evidence to reinforce the conclusion that Wilmington is indeed a single settlement.

4.10 The history, the form and appearance, the architectural form and the landscape setting of Wilmington all meet the ‘cultural heritage’ criterion for inclusion introduced by the 2007 NERC Act.

5. Historical appraisal of Wilmington

5.1 Appendix 2 is a statement on the historical development and form of Wilmington, using references and sources, by a local medieval specialist. This should be read with Maps (1) – (4), which date from the eighteenth and early nineteenth centuries.

5.2 This historical research shows that the village has always had the form and geography that it has today; that the principal common, Wilmington Common or Wilmington Green, has been the same size and shape for 300 years; that it has always been a principal feature of the settlement, acting as a key part of its economy in pre-industrial times; and that the settlement’s south-to-north axis and links were not altered by the building of the east-west turnpike in 1829.

5.3 Appendix 3 (bound separately), the Management Plan for Wilmington & Monken Pyn Commons, gives full details of their history and role in the past and now. The maps and the text (see para 2.1) demonstrate that the name ‘Wilmington Green’ is an alternative name for Wilmington Common. It has never been the name of a ‘settlement’ at any time, despite the impression given by some scales of modern Ordnance Survey map.

5.4 Appendix 3 section 4 describes the history of the two commons – Monken Pyn is further north – and notes (Para 4.10) that the commons were registered in 1970 under the 1965 Commons Registration Act.

6. The Character of Wilmington

6.1 From the knowledge and expertise of local residents, the following picture of the historical development and built form of Wilmington has been put together.

6.2 For a settlement to be established a reliable supply of water was essential. Along the north-facing scarp slope of the South Downs, water seeped down through the chalk to be caught on the underlying gault clay and issued along the spring line of the north face.

6.2 This led to the establishment of spring-line settlements. Wilmington is one of larger and most tightly developed of these villages.

6.3 Wilmington extends from Monken Pyn (old Saxon for “monks enclosure”) Common southwards to the Long Man on the north-facing scarp slopes of the South Downs. Arriving from the north, Wilmington first comes into view as one breasts the railway crossing, passing the Home Farm (built in 1926) before arriving on the large and open expanse of the common land, Wilmington Common or Green. This is bordered on the west by loosely-spaced cottages (2 are listed) and on the east by hedged fields to the east, until the listed Crossways House is reached.

6.4 Crossways originally faced west across the common, but a Regency-period south-facing frontage was added when the turnpike was built across the common in 1829. The common embraces two houses, The Forge and the Wishing Well, the former now a house and the latter a tearoom. The common leads directly into The Street, the most densely developed part of the village.

6.5 From this point The Street continues southwards in a more closed form. Although a linear street, it is not straight. It is slightly sinuous in its course and rises gently. This offers the element of surprise to the viewer: a continuous and unfolding view of houses of great variety flanking the properties flanking the Street. The visual enjoyment is heightened by the variety of buildings and their varying distances of set back from the carriageway.

6.6 Near the top of the village to the south the Street narrows and rises sharply between flint enclosing walls. Here is found the Grade 1 Church on the west side, with an ancient yew tree reputed to be 1000 years old. Opposite is the Georgian Old Vicarage. By the Church is the Grade 1 Wilmington Priory. This part of Wilmington is a Scheduled Ancient Monument, including the old village pound for stray cattle and sheep.

6.7 Hard by are the walls of the ancient tythe barn. The space here is a car park for visitors to the Long Man. Close by is the granite John Jeffrey Farnol seat and then the open countryside to the bridle path which runs to the Long Man himself.

6.8 All the above is described graphically in the illustrated Wilmington Village Walk produced by the Women's Institute and published by East Sussex County Planning Department in 1978 (Appendix 4). The cover drawing of this booklet shows the view from the middle of the common towards the Forge, across the main road. The walk starts north of the A27 and the map (between pages 7 and 8) shows the village as a whole, including Wilmington Green.

6.9 The above description strongly supports the correctness of the inclusion of all of Wilmington, up to the railway line, in the National Park, as recommended by the Inspector. The inclusion of cultural heritage as a consideration in assessing natural beauty, and the role that Wilmington plays as a Downland village, strengthen the case for this inclusion.

7. The support for and objections to Addition 11

7.1 There has been wide support for Addition 11 from local people and conservation organisations. The inclusion of all of Wilmington has been given strong backing in letters to Defra, and the fact that Wilmington is one settlement – and that there is no separate settlement called 'Wilmington Green' - is frequently stressed in responses. There has been no objection from any resident living within Addition 11 to its inclusion in the National Park. It is supported by the Folkington Estate which owns several fields recommended for inclusion between the A27 and the railway line nearest to Folkington. Appendix 5 is a collated set of letters from residents responding to Long Man Parish Council's circular about the recommended Addition.

7.2 Objections have been lodged only by local authorities, by the MP for Eastbourne (not the constituency in which Addition 11 is located), by the East Sussex Economic Partnership, and by the Agent for a developer, Pelham Homes.

7.3 The reason for the objections is that the local authorities and the other objectors wish to see the A27 widened, or rerouted through the land recommended for inclusion. While the objections have been dressed up to argue that the land between the A27 and the railway line does not meet the criteria for inclusion, none of the objectors has any interest in the village of Wilmington itself. The motive – to enable more development at Polegate, Eastbourne or Hailsham, by enabling a new or widened A27 to be built through Wilmington, are transparent from a reading of the objections.

7.4 In order to challenge the reason for the recommendation, the objectors assert that Wilmington and Wilmington Green are two settlements either side of the A27, and that Wilmington is not a single settlement.

8. Response to the local authorities' objections

Wealden District Council

8.1 The local planning authority, Wealden District Council, asserts (objection ref 860) that ‘the formally designated Wilmington Conservation Area (which lies south of the A27) is both visually and architecturally distinctive from that area of Wilmington lying to the north of the road. Indeed the two areas are physically separated by the road and the former Countryside Agency.... regarded them as separate in supporting the original boundary for the national Park’.

8.2 Wealden District Council thus does not itself claim that Wilmington is two settlements rather than one, only that the part of Wilmington south of the A27 is ‘visually and architecturally distinctive’ from that to the north. As the historical evidence here presented, and the description above shows, the village is and always has been a single settlement. Visual or architectural distinctions within a settlement are not grounds for dividing it. The criteria set in 2002 state that a village should not normally be cut in two by a National Park boundary; Wealden appears to be supporting that very act.

8.3 Once a decision to include all of a settlement is made because this meets the criteria set, the choice of boundary should follow criterion (e): “*Wherever possible, an easily distinguishable physical boundary should be chosen*”. As Wilmington is one settlement, the easily distinguishable boundary that includes the whole of it is the railway line, and the well-treed line of the old track from Monken Pyn to Milton Street (now a footpath only).

8.4 Wealden District Council (followed by the other objectors) contends that the landscape between the A27 and the railway is not of a sufficiently high quality that would merit National Park status. But it is also for the most part similar in appearance to the landscape immediately south of the A27, which is included.

8.5 The criteria for inclusion make clear that a boundary will not usually be found that marks a change in landscape character. “*In most situations there will be a transition of landscape quality and recreational experience across a sweep of land: the boundary chosen should be an easily identifiable feature within this transition*” (para 4 of Criteria, [Appendix 1](#)). This applies at Wilmington.

8.6 The views from Wilmington Hill and from around and above The Long Man moreover put all of Wilmington in the foreground. The village, with its common, is the most important

feature of the view. The A27 runs across the foreground and does not appear as a boundary. The railway, largely on embankment north of Wilmington, offers a much clearer line of visual change, with the Low Weald landscape starting from behind it.

8.7 If the nature of the landscape is a relevant consideration in setting the boundary to include all the settlement, therefore, the railway is a boundary that best meets the criteria to be applied.

East Sussex County Council

8.8 ESCC's written objection makes similar points to those put by Wealden District Council. It is unclear from the text whether ESCC itself believes that Wilmington and Wilmington Green are two different settlements (Wealden District Council does not). It seems to rely on the view of the Countryside Agency expressed at the original inquiry, without noting that Natural England now does not challenge the Inspector's finding and recommendation at this Inquiry. But other passages ('These two settlements....most of the few buildings in Wilmington Green') point to ESCC seeing the part of Wilmington now recommended for addition to the National Park as a separate settlement called Wilmington Green.

8.9 ESCC accepts that the additional land recommended is defined by recognizable features in line with the boundary-setting criteria. It instead asserts that the area recommended for inclusion is 'out of proportion to the stated aim of including what amounts to a very few houses, a small hotel and a motor vehicle sales garage'. This overlooks entirely the main feature of that part of Wilmington, the registered commonland itself. It can be concluded that ESCC does not realise that Wilmington Green is the common, not the name of a settlement, or that there is a registered common at Wilmington. It is difficult to avoid the conclusion that ESCC made the decision to object without anyone visiting Wilmington or doing any research into the village's history and character.

Eastbourne Borough Council

8.10 Eastbourne Borough Council is not the planning authority for Long Man Parish; its boundary with Wealden District is some 5 miles east of Wilmington. It thus does not appear to have any local knowledge; its objection seems to be based wholly on a desk-based examination of Wealden District Council's statutory Local Plan (1998) and 2005 non-statutory Local Plan and of Ordnance Survey map notations.

8.11 In Eastbourne Borough Council's written objection, it admits that Wilmington has no development boundary and that 'development boundaries are not the same as settlement boundaries'. It then reproduces (at its page 9) the Wealden Local Plan (1998) Inset Map 60. This shows the Conservation Area boundary, but no settlement boundary. Nevertheless this is called 'this settlement boundary' in the text below. On page 10, it reproduces the Inset Map 65 from the 2005 non-statutory Local Plan, but this again only shows the boundary of the Conservation Area.

8.12 In neither the adopted Local Plan nor the non-statutory Local Plan does Wealden District Council show, or ever suggest, that there is a 'settlement boundary' for Wilmington. The small inset map shown on page 11 of Eastbourne Borough Council's objection only denotes the location of the Inset Plan on the overall Proposals Map. And the edges of an Inset Map are merely the outer edge of an area chosen for enlargement, not a boundary of any kind.

8.13 Eastbourne Borough Council's conclusion, at page 11, is that 'the inspector's recommendation is based principally upon an assumption that the settlement boundary of the village of Wilmington was not defined in any development plan or other document, which is patently incorrect...' It is the Borough Council's belief that there is a settlement boundary defined for the village of Wilmington which is patently incorrect. The Inspector's recommendation is soundly based.

8.14 Eastbourne Borough Council have also relied on a Cartoplus map (see reference at p10-11). That the name 'Wilmington Green' appears on certain maps does not mean it is a settlement. The Council does not appear to know that the name applies to the common.

All the local authorities

8.15 All the local authorities have as their main (or real) objection the impedance that inclusion of all of Wilmington in the National Park would cause to their future (not existing) development plans and to the improvements to the A27 that they would like to see. These are not criteria relevant to the setting of the National Park boundary. There is no land allocated for development in any statutory Local Plan in the area of addition 11. (Land can be excluded if there are allocations in a Local Plan for uses which conflict with National Park purposes.) And there is no formal road proposal being made within recommended Addition 11. The Highways Agency cannot say whether there will ever be one, and cannot give any timescale for such a scheme.

8.16 The local authorities' objections see the designation process the wrong way round. The National Park's boundaries should be fixed on the basis of the published criteria. It is then for the local authorities to develop policies and proposals that take the National Park boundary as a constraint.

8.17 If there was a basis in their existing adopted Plans for opposing recommended Addition 11, it would be different. But the Addition would not be in conflict with any policy in the development plan for the area. This is, since September 2007, primarily the 'saved' Policies of the adopted (1998) Wealden Local Plan, and RPG9 (the statutory Regional Spatial Strategy for the South East). Neither Wealden District Council nor ESCC list any statutory policies with which the inclusion of Addition 11 in the National Park would conflict.

Other objectors

8.18 East Sussex Economic Partnership have submitted a statement to the Inquiry. Its objection does not address the criteria for inclusion of settlements in the National Park, and is concerned solely with economic development aspirations for the Eastbourne-Hailsham area. The 'Partnership' plans that it describes are not part of any statutory development plan and are at discussion stage. There are no proposals for development within recommended Addition 11.

8.19 Nigel Waterston MP (ref 1982) has objected because he does not think the line of the A27 should be included in the boundaries of the National Park. He wishes to see a dual carriageway along the A27 between Lewes and Polegate. He overlooks two facts:

- Part of the A27, between Glynde and Lewes, is included within the National Park boundary and this has not prevented on-line improvements being made between Southerham and Beddingham roundabouts (nearly complete as of February 2008).
- The Secretary of State for Transport has no proposals for a dual carriageway between Lewes and Polegate, and the current improvements have been to single carriageway standard.

8.20 Mr Waterston is the MP for Eastbourne which is some miles to the east of Wilmington. He has no constituency responsibility for Long Man Parish and has not consulted the Parish Council.

9. Comments on the Highways Agency's response

9.1 None of the objectors are responsible for decision-making about the A27, which is a trunk road. They are thus lobbyists for its dualling or re-routeing through the recommended additional land (and thus for road-building on common land).

9.2 The Highways Agency, the highway authority for the A27, has not objected (see ref 1711, letter of 20 September 2007). It accepts that Wilmington is one village – it notes that the boundary recommended would mean that ‘the whole of the village of Wilmington’ would be within the National Park. It does not offer any details of any road proposals, nor does it contend that road improvements will be undertaken within any specific time period. (The timescale put forward by the objectors in their written objections is taken from a SEERA prioritisation list, which does not commit the Secretary of State for Transport.)

9.3 The Agency only states that it ‘would be concerned’ about Addition 11. In practice the improvements that it is making on the A27 are on-line safety works. Such works – including the junction improvement carried out at the access to Charleston Farmhouse, west of Selmeston – would not be impeded by National Park status. Ordinary on-line road improvements (eg junction layout changes) are undertaken using permitted development rights. They can be undertaken by highway authorities within National Parks, and not infrequently are.

9.4 It should also be noted that the Highways Agency is undertaking a more major on-line improvement of the A27 within the AONB and proposed National Park between Lewes and Glynde (now nearly completed). The current and proposed status did not prevent that work. It has ensured that the scheme was kept to single-carriageway standard and that prominent structures, notably the Beddingham bridge over the railway, have been built to a higher standard of finish than normal trunk road bridges receive.

9.5 It should also be kept in mind that the one new trunk road proposal at Wilmington that the Highways Agency protected from development in the past was almost entirely outside the area of Addition 11. See alignment withdrawn in 2003: Map (6). That route was located north of the railway and then generally north of the Monken Pyn-Milton Street footpath. The constraint of the commonland of Wilmington Green was evidently recognised at that time.

10. Pelham Homes – commercial interest and planning proposals

10.1 Pelham Homes have objected to Addition 11 and have submitted evidence to the Inquiry. The status of this objector needs some explanation.

10.2 Pelham Homes (now apparently renamed Pelham Holdings Ltd on latest documents) appears to have options on land west and north of Polegate. This is marked on maps attached to the evidence of David Jarvis (ref 1503/1/1). It does not own any of the land identified, as far as is known locally; so its claim of ‘control’ is tenuous.

10.3 The land in which Pelham Holdings is interested in lies outside the proposed National Park and some distance to the east of Addition 11. Its evidence does not describe the development proposals it has made, although there is a reference to its ‘proposals to develop land around the town of Polegate’ at page 2 of the objection letter of 23 September 2007 sent to Defra by Jennifer Owen Associates (ref 1503, see page 2, attached to proof of Patrick Gurner, ref 1503/2/1).

10.4 What Pelham Holdings’ witnesses do not say is that Pelham Homes made planning applications in July 2006 to Wealden District Council for major development of the land marked on the maps (PEL series attached to David Jarvis’ proof). These applications were

- WD/2006/1415/MEA 1,000 houses west of Polegate and new ‘Folkington Link’ road for A27
- WD/2006/1416/MEA 2,200 houses west and north of Polegate and new ‘Folkington Link’ road for A27

10.5 The proposals in the 1,000-house application WD/2006/1415/MEA are attached as Appendix 6. The very extensive urban development applied for, next to and north of the National Park boundary, can be seen. The south-western part of both the proposed new housing and the proposed Folkington Link in that application were on land that Pelham Homes did not and do not control, being in the ownership of the Folkington Estate which objected to the applications.

10.6 A very large number of objections were made to the Pelham Homes applications. Objectors included the Countryside Agency and English Heritage (Appendix 7 and 8).

10.7 The applications were refused by Wealden District Council on a wide range of grounds. The refusal notice for the 1,000-house application WD/2006/1415/MEA is attached.

10.8 Despite these refusals of permission, Pelham Homes (Holdings) are understood to be preparing a new set of planning applications.

10.9 Any development west of Polegate would extend to the boundary of Long Man Parish, and would be a Departure from the adopted 1998 Wealden Local Plan. The non-statutory Wealden Plan of 2005, while it proposes a smaller development of some land west of Polegate, has no development plan status and was not subject to any independent testing through a public inquiry (the statutory Plan Review was withdrawn after First Deposit Draft in 2004). The Wealden Local Development Framework Core Strategy has reached Issues & Options stage and the Council has not reached submission stage of any of its intended LDF documents.

11. Response to Pelham Homes

11.1 The motives of Pelham Homes in objecting to Addition 11 are clear from the history of their attempts at obtaining permission for development. Their agent has not contacted Long Man Parish Council, or sought its views, before making objections to the proposals for the National Park boundary. The Parish Council has had to find out about Pelham Homes's objection by examining the volumes of objection letters put on deposit by Defra in Autumn 2007, and obtaining the Pelham Homes proofs from the Inquiry website.

11.2 Pelham Homes does not accept that Wilmington is a single settlement. In its objection letter of 23 September it relies solely on the Countryside Agency's statement to the original Inquiry to that effect.

11.3 In David Jarvis's evidence, it is asserted that Wilmington and Wilmington Green are separate settlements – section 6 and para 8.2. At para 6.5 Mr Jarvis states "*Wilmington and Wilmington Green are clearly very different settlements sharing few, if any, common features*". He compounds this at para 6.9: "*Where such 'settlements' are divided by a major route and have two distinct names and two distinct characters, why should they be conjoined under one title?*".

11.4 These statements show that Pelham Homes have reached a conclusion at complete variance with the evidence, now presented in Long Man Parish Council and by local people in their letters to the Inquiry. Pelham Homes

- have not understood, or researched, the character and history of Wilmington
- do not know that Wilmington Green is only the name of the common
- know nothing of the structure and form of Wilmington as a village
- have relied on maps and a visit to take photographs without consulting local residents

11.5 Pelham Homes also fail to address the tests for deciding on inclusion of settlements in the National Park. Their evidence does not examine the contribution that Wilmington as a whole will make to the character and purposes of the Park.

11.6 The remaining evidence of Pelham Homes addresses the SEERA aspirations for road improvements, and the Panel recommendations on the South East Plan.

11.7 The position on possible trunk road proposals is covered at section 9 above. The South East Plan is between Panel Report and Proposed Modifications stage, and the Panel's comments have not led to any changes to the Plan.

11.8 There are no proposals for development of any kind in any statutory development plan for the Addition 11 land.

12. Conclusion

12.1 The objections see the designation process the wrong way round. The National Park's boundaries should be fixed on the basis of the published criteria. It is then for the local authorities to develop policies and proposals that take the National Park boundary as a constraint.

12.2 The additional cultural heritage principle that the NERC Act has introduced since the original inquiry strengthens the case for the recommendation to include all of Wilmington in the National Park.

12.2 Addition 11 should be included in the designated area of the South Downs National Park.